

AGENDA

Meeting: **Cabinet**
Place: **The Kennet Room - County Hall, Trowbridge BA14 8JN**
Date: **Tuesday 10 October 2017**
Time: **9.30 am**

Please direct any enquiries on this Agenda to Will Oulton, of Democratic Services, County Hall, Trowbridge, direct line 01225 713935 or email william.oulton@wiltshire.gov.uk

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Membership:

| | |
|------------------------------------|------------------------------------------------------------------------------------------|
| Cllr Baroness Scott of Bybrook OBE | Leader of Council |
| Cllr John Thomson | Deputy Leader, and Cabinet Member for Communications, Communities, Leisure and Libraries |
| Cllr Chuck Berry | Cabinet Member for Economic Development and Housing |
| Cllr Richard Clewer | Cabinet Member for Corporate Services, Heritage, Arts and Tourism |
| Cllr Laura Mayes | Cabinet Member for Children, Education and Skills |
| Cllr Toby Sturgis | Cabinet Member for Spatial Planning, Development Management and Property |
| Cllr Bridget Wayman | Cabinet Member for Highways, Transport and Waste |
| Cllr Philip Whitehead | Cabinet Member for Finance, Procurement, ICT and Operational Assets |
| Cllr Jerry Wickham | Cabinet Member for Adult Social Care, Public Health and Public Protection |

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Part I

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

Key Decisions Matters defined as 'Key' Decisions and included in the Council's Forward Work Plan are shown as 

1 **Apologies**

2 **Minutes of the previous meeting** (*Pages 5 - 18*)

To confirm and sign the minutes of the Cabinet meeting held on 12 September 2017, previously circulated.

3 **Declarations of Interest**

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

4 **Leader's announcements**

5 **Public participation and Questions from Councillors**

The Council welcomes contributions from members of the public. This meeting is open to the public, who may ask a question or make a statement. Questions may also be asked by members of the Council. Written notice of questions or statements should be given to William Oulton of Democratic Services by 12.00 noon on Wednesday 4 October 2017. Anyone wishing to ask a question or make a statement should contact the officer named above.

6 **Proposed changes to the Councils Allocation Policy** (*Pages 19 - 82*)

 Report by Alistair Cunningham, Corporate Director.

7 **Wiltshire Core Strategy Review - Regulation 18 Consultation** (*Pages 83 - 262*)

 Report by Alistair Cunningham, Corporate Director.

8 **Military Civilian Integration (MCI) Partnership Update** (*Pages 263 - 278*)

Report by Alistair Cunningham, Corporate Director.

9 **Urgent Items**

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

Our vision is to create stronger and more resilient communities. Our priorities are: To protect those who are most vulnerable; to boost the local economy - creating and safeguarding jobs; and to support and empower communities to do more themselves.

CABINET

DRAFT MINUTES OF THE CABINET MEETING HELD ON 12 SEPTEMBER 2017 AT THE KENNET ROOM - COUNTY HALL, TROWBRIDGE BA14 8JN.

Present:

Cllr Baroness Scott of Bybrook OBE (Chairman), Cllr John Thomson (Vice Chairman), Cllr Richard Clewer, Cllr Toby Sturgis, Cllr Bridget Wayman, Cllr Philip Whitehead and Cllr Jerry Wickham

Also Present:

Cllr Clare Cape, Cllr Pauline Church, Cllr Christine Crisp, Cllr Jane Davies, Cllr Tony Deane, Cllr Stewart Dobson, Cllr Richard Gamble, Cllr Darren Henry, Cllr Alan Hill, Cllr Ruth Hopkinson, Cllr Atiquil Hoque, Cllr David Jenkins, Cllr Bob Jones MBE, Cllr Johnny Kidney, Cllr Gordon King, Cllr Edward Kirk, Cllr Jacqui Lay, Cllr Horace Prickett, Cllr Tom Rounds, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Ian Thorn, Cllr Tony Trotman, Cllr Philip Whalley, Cllr Stuart Wheeler, Cllr Roy While and Cllr Graham Wright

102 Apologies

Apologies were received from Cabinet Members Chuck Berry and Laura Mayes. Councillor Jon Hubbard, Chair of the Childrens' Select Committee also gave his apologies.

103 Minutes of the previous meeting

The minutes of the meeting held on 3 July 2017 were presented.

Resolved

To approve as a correct record and sign the minutes of the meeting held on 3 July 2017

104 Minutes - Capital Assets Committee

The minutes of the meeting held on 3 July 2017 were presented.

Resolved

To note the minutes of the meeting held on 3 July 2017

105 Declarations of Interest

There were no declarations of interest.

106 **Leader's announcements**

The Leader made the following announcements:

That the route for the £1.6 billion Stonehenge Tunnel, a key part of the 'South West expressway', had today been published by Transport Secretary Chris Grayling. It was noted that this 'expressway' would upgrade this key route and improve journey times for millions of people.

Furthermore that this major investment would support economic growth and tourism in an area where congestion and slow journeys have long had a negative impact on the economy. The tunnel at Stonehenge would remove the traffic blight on local communities such as Shrewton and reconnect the two halves of the 6,500 acre World Heritage Site which is currently split by the road.

The Leader welcomed the announcement of the Preferred Route, and stated that the council would continue to work with government and all its partners and local communities to deliver this major improvement scheme.

107 **Public participation and Questions from Councillors**

The Leader explained her approach to public participation and stated that she would take any representations under the item to which it related.

108 **Performance Management and Risk Outturn Report: Q1 2017/18**

Councillor Philip Whitehead presented the report which provided an update on the progress against the stated aims in the council's Business Plan. It also included measures and activities reported on the [Citizens' Dashboard](#) and other key measures, as well as the latest version of the council's strategic risk register. The report covered the period April to June 2017.

In presenting the report, Councillor Whitehead highlighted the areas of good performance and those that required some attention; he also explained the new approach to the classification of risk that it was hoped would enable better ownership of higher risk areas.

Councillor Whitehead expressed his significant concern as to the negative impact on the Wiltshire and Swindon arising from the unduly negative picture painted by the recent Channel 4 programme following police in the area.

Following a short debate, the meeting;

Resolved

To note updates and outturns

- 1. Against the measures and activities ascribed against the council's key outcomes; and**
- 2. To the strategic risk register.**

Reason for Decision:

The current performance framework compiles and monitors outturns in relation to the outcomes laid out in Wiltshire Council's Business Plan 2013-17. The framework is distilled from individual services' delivery plans. In doing so, it captures the main focus of activities of the council against each outcome. The strategic risk register captures and monitors significant risks facing the council: in relation to significant in-service risks facing individual areas, in managing its business across the authority generally and in assuring our preparedness should a national risk event occur.

109 **Revenue and Capital Budget Monitoring report**

Councillor Philip Whitehead presented the report which advised members of the revenue and capital budget monitoring position as at the end of period 4 (end of July 2017) for the financial year 2017/2018 with suggested actions as appropriate; informed Cabinet on the position of the 2017/2018 capital programme, as at Period 4 (31 July 2017), including highlighting budget changes. It was noted that the report was the first combined revenue and capital report.

Issues highlighted in the course of the presentation and discussion included: that a £4.4m overspend was currently predicted, but that this was lower than the predicted overspend of £10m at the same time last year which itself was addressed by management actions; whether it was possible to do more to financially plan for unpredicted events; and that sometimes decisions are made in year, for the right reasons, that have a negative impact on the budget previously planned for.

Following a short debate, it was;

Resolved

to note the outcome of the period 4 (end of July) budget monitoring and to approve all budget amendments outlined in the report.

To note the budget movements undertaken to the capital programme shown in appendices D and E and to also note the reprogramming of the capital £23.620 million between 2017/2018 and 2018/2019.

Reasons for Decision:

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

To inform Cabinet of the position of the 2017/2018 capital programme as at Period 4 (31 July 2017), including highlighting any budget changes

110 **Treasury Management Report Quarter 1**

Councillor Philip Whitehead presented the report which summarised the annual performance against the agreed Treasury Management Strategy.

In response to a question from Councillor Ian Thorn, Councillor Whitehead stated that he would be happy for future Treasury Management reports to be considered by the Financial Planning Task Group if they so wished.

Resolved

to note that the contents of this report are in line with the Treasury Management Strategy.

Reason for Decision:

To give members an opportunity to consider the performance of the Council in the period to the end of the quarter against the parameters set out in the approved Treasury Management Strategy for 2017/2018.

111 **Business Rates Discretionary Relief Scheme**

Councillor Philip Whitehead presented the report which sought agreement on proposals to amend the Business Rate Discretionary Relief Policy in order to award additional funding to those ratepayers who are facing an increase in their bills following revaluation with effect from April 2017.

Issues highlighted in the course of the presentation and discussion included: that the scheme had no impact on discretionary relief for village halls; how the scheme was designed so that chain establishments did not benefit; and the number of establishments that would be positively affected.

Following a short debate, the meeting;

Resolved

To agree changes to the discretionary rate reduction scheme set out at section 6 of this report, with effect from April 2017.

Reason for Decision:

On 8 March 2017 the Chancellor announced that new schemes of relief would be made available to those ratepayers facing large increases as a result of revaluation. He set out three schemes and how they would be funded over four years from 2017/18. The Chancellor stated that local government is best placed to determine how this fund should be targeted and administered to support those businesses that are in greatest need.

This report explains the three schemes, how they will integrate with the existing discretionary rate relief schemes and how the schemes are funded. The report goes onto explain the criteria for awarding the reliefs, the process to ensure the 'best-buy' for the customer and how those funds will be directed.

The Government's intention is that every billing authority in England will identify recipients of the new reliefs and be provided with a share of the £300 million to support their local businesses and will be administered through existing discretionary relief powers under section 47 of the Local Government Finance Act 1988. The proposal sets out the criteria and process by which new relief will be awarded.

112 **Impact of Adult Care Charging Policy**

Councillor Jerry Wickham presented the report which had been prepared to provide the Cabinet with an update on the implementation and impact of the Adult Care Charging Policy (the charging policy) which came into effect in August 2016, including the Council's response to the report commissioned from Healthwatch into the impact of the implementation of the Charging Policy. The report also provided a summary of the actual and projected financial impact of this new policy based on data collected between August 2016 and the beginning of July 2017.

Councillor Wickham also introduced Sandie Lewis from Healthwatch Wiltshire to provide further information on the work undertaken on the matter.

In presenting the report, Councillor Wickham highlighted the issues that were identified with the implementation of the policy, the changes made following its review, and stated that he had apologised the people who had been affected by the changes.

Issues highlighted in the course of the presentation and debate included: how the Health Select Committee had been involved in the matter; that the Council had been successful in helping clients maximise the benefits they were entitled to; and that the lessons learnt from the review of the implementation of the policy were being shared in other areas of the council's work.

Resolved

To note the implementation of the new Charging Policy; Healthwatch Wiltshire's review of the implementation; and the actions taken by the Council in respect of that review.

Reason for Decision:

This paper has been prepared for the Cabinet following the recommendation of the Health Select Committee.

113 **Integrated Urgent Care Procurement**

Councillor Jerry Wickham presented the report which provided an update on the joint procurement process between Wiltshire Council and Wiltshire CCG, in partnership with B&NES CCG and Swindon CCG for integrated urgent care services; and asked Cabinet to delegate the authority to award the contract.

Following a short debate, the meeting;

Resolved

- a) To note the update of the joint commissioning exercise with Wiltshire Council and Wiltshire CCG, in partnership with B&NES CCG and Swindon CCG, of urgent care services.**
- b) To delegate the authority, in relation to the services being commissioned by Wiltshire Council (as set out in paragraph 13 below):**
 - i. To approve the terms of the contract and all associated documents within the parameters set out in this report; and**
 - ii. To award and enter into the contract and all associated documents, to the Corporate Director for Adult Social Care in consultation with the Cabinet Member for or Health (including Public Health) and Adult Social Care.**

114 User Engagement with Adult Care

Councillor Jerry Wickham presented the report which informed the Cabinet of current contract and funding arrangements that the Council has with User Led Organisations and Healthwatch Wiltshire to engage with customers on adult care services; and sought the Cabinet's view of the options set out below to commission the statutory Healthwatch function and the non-statutory customer engagement functions provided by User Led Organisations (ULOs) and to agree an option.

In presenting the report, Councillor Wickham gave a summary of the position of the contracts, the views expressed by the ULOs, and stated that he wished the matter to be deferred to enable further constructive discussion with partners so that an approach could be agreed.

At the invitation of the Leader, Clare Evans MBE, Chair of the Wiltshire Centre for Independent Living, addressed the meeting and stated that: the valuable work of the ULOs had given the disabled communities the confidence to make their views known, and in doing so, worked with the council over a number of years to improve policy and practice. Furthermore, she stressed the ULOs commitment to working with the council recognising the need to address financial constraints.

Councillor Crisp, Chair of the Health Select Committee, gave an overview of the debate previously held on the matter, and stated that the Committee broadly welcomed the further opportunity given to the ULOs to discuss the matter with the council and its partners.

Resolved

- 1. To defer consideration of the item until the November 2017 meeting of Cabinet on the proviso that constructive dialogue takes place between commissioners in both Wiltshire Council and Wiltshire CCG together with the three User-Led Organisations (ULO); and**
- 2. That the current contract is extended until 1 June 2018 and the specification for the new arrangements are developed in readiness for a tender to be issued in late November 2017**

Reason for Decision

Commissioners recognise that there is scope to remove duplication and that are several activities currently funded in contracts that could be removed from future service specifications to achieve savings and provide a more focused service.

115 Freehold of asset to be sold

Councillor Toby Sturgis presented the report which asked Cabinet to declare that freehold interest of the 5 assets could be sold by the Council.

In response to representations from Councillor Stewart Dobson, Councillor Mervyn Hall – Mayor of Marlborough, and Ian Mellor – from the Marlborough Area Neighbourhood Plan Group, it was agreed that the decision to delegate authority to dispose of Site 2, St Peter's School, would be subject to officers working with the local community to develop guidance for potential developers of the site.

In response to a question from Councillor Ian Thorn, it was confirmed that none of the assets under consideration for disposal were on the Community Assets register, and that officers would circulate a briefing note to all Councillors to make them aware of the process and the list of asset already identified.

Resolved

- i) To confirm that the freehold interest of the 5 assets, as listed below, can be sold by the Council:**
 - a. Site 1 - Trowbridge – Land at The Halve**
 - b. Site 2 - Marlborough – St Peter's School**
 - c. Site 3 - Westbury – Part of Coulston Allotments**
 - d. Site 4 - Macklin Road, Salisbury – Land used as garden extension**

e. Site 5 - Devizes – Land at John Rennie Close

- ii) **To confirm the approach set out in paragraph 8 of the report.**
- iii) **To authorise the Associate Director for People and Business to dispose of freehold interest of the assets.**
- iv) **That the delegation to the Associate Director, as stated in iii), in relation to Site 2 - Malborough – St Peter’s School, is subject to the involvement of the community in the development of planning information for potential developers of the site.**

Reason for Decision:

To confirm the freehold interests of the assets can be sold in order to generate capital receipts in support of the Council’s capital programme.

116 Amendments to the Wiltshire Local Transport Plan (LTP) 2011-2026 – Car Parking Strategy

Councillor Bridget Wayman presented the report which asked Cabinet to consider and agree possible car parking charging options for inclusion in a subsequent public consultation exercise.

In presenting the report, Councillor Wayman highlighted: the history of parking charging in the area; how the revenue generated is used to support subsidies for rural bus routes; the opportunities to pilot technology to support staff and car park users; the plans for consultation, and how some the decision had already been made not to pursue some options such as charging for blue badges and levying charges in the evening.

Issues highlighted in the course of the presentation and discussion included: the concerns expressed by some councillors that the need for charging be balanced against the need to encourage visitors to towns to promote economic regeneration; whether schools would be willing to pay for some static cameras; how best to engage with the various communities and interest groups; and that the Cabinet had not taken a position on preferred options.

Following a short debate, the meeting;

Resolved

- (i) To note the technology and operational improvement proposals outlined in this report.**
- (ii) To confirm that all seven proposals for car parking charging options be included in a public consultation exercise.**

- (iii) To approve the suggested format for the public consultation exercise as set out in paragraphs 49 to 54.
- (iv) To agree that, subject to any responses received during the public consultation, Option 1 is implemented as soon as possible through a variation notice to the Traffic Regulation Orders and delegates authority to the Associate Director for Highways and Transport in consultation with the Cabinet Member for Highways, Transport and Waste to consider any suggestions from respondents for alternative ways in which the estimated income increase from the option could be met by other means, and, with the advice of legal and parking services, to negotiate and agree any resulting legal agreements.

Reason for Decision:

To seek comments and approval from cabinet to undertake consultation on proposed parking charging options to address the identified financial, technology and operational pressures faced by Parking Services.

117 **Wiltshire Local Development Scheme update**

Councillor Toby Sturgis presented the report which sought Cabinet's approval for a revised Local Development Scheme (LDS) for Wiltshire to ensure it is up to date and sets out the Council's priorities for development plan document preparation in Wiltshire over the period 2017 to 2020.

In presenting the report, Councillor Sturgis highlighted the changes that were being made, and the work that would be undertaken in line with the timetable. In moving the recommendation stated that he would like an additional resolution that reflected the requirement for Swindon to have established a five-year land supply as a prerequisite for any joint agreement.

Councillor Gamble in referring to the list of Neighbourhood Plans in the Local Development Scheme, expressed concern about the weight to be given to emerging neighbourhood plans in the preparation of the Local Plan that had not reached the Regulation 16 stage and the need for engagement with all neighbourhood plan groups, whatever stage they had reached. Councillor Sturgis stated that he did not support an extension of the list of Neighbourhood Plan Schemes to include those that were not further developed but that neighbourhood planning groups would be consulted on the preparation of the plans and their views taken into account.

In response to a question from Francis Morland, Councillor Sturgis stated that the issue of the publication of the SHMAA and FEMAA documents, considered in draft in part ii of the meeting, will be considered at the joint meeting of the two authorities on the 18 September at which time a publication date will be decided.

Resolved

- (i) To approves the Local Development Scheme as set out at Appendix 1.**
- (ii) To authorises the Associate Director for Economic Development and Planning, in consultation with the Cabinet Member for Spatial Planning, Development Management and Property, to make minor amendments to the Local Development Scheme in the interests of clarity and accuracy before publishing it on the Council’s website.**
- (iii) To delegates authority to the Associate Director for Economic Development and Planning, in consultation with the Associate Director for Finance and Cabinet Members for ‘Spatial Planning, Development Management and Property’ and ‘Finance’ to undertake subsequent reviews and updates to the LDS with any significant modifications being referred to Cabinet as appropriate.**
- (iv) To agree that a strategy for emergency stopping places for Gypsies and Travellers should be undertaken as part of delivering the approved Wiltshire Traveller Strategy.**
- (v) To reaffirm its commitment to joint working with Swindon Borough Council, however given the Council’s responsibilities to support the interests of Wiltshire’s communities, that Cabinet will need to be satisfied that plans are in place to maintain a deliverable 5 year housing land supply in both authority areas before approving the plans.**

118 Chippenham Station Hub update

The Leader presented the report which provided an update on project progress and the main considerations concerning the next phase of project development: The development of a Full Business Case (FBC) and submission of a planning application.

In presenting the report, the Leader highlighted the history of the project, the next steps including the risks and benefits of the project.

In response to representations made by Councillor Clare Cape, the Leader stated that whilst the project would be beneficial for Chippenham overall, she agreed that some issues arising from the works, such as parking and traffic, would need to be considered.

In response to a question from Councillor Ian Thorn, Alistair Cunningham – Corporate Director, confirmed that in accordance with normal guidance to developers, those responsible for delivering the project were in pre-application discussions with the planning authority.

Following a short debate, the meeting;

Resolved

- 1. To note the progress of the Chippenham Station Hub project.**
- 2. To note the identified risks involved with progressing the project.**
- 3. To approve the development and delivery of the Full Business Case and Planning Application using Department for Transport retained funding.**

Reason for Decision:

To ensure that Wiltshire Council maximizes the benefits and opportunities associated with the Growth Deal programme in terms of delivering key infrastructure projects and building Wiltshire's economy whilst managing the financial implications and associated risks to the organisation.

119 Urgent Items

There were no urgent items.

120 Exclusion of the Press and Public

Resolved

To agree that in accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting for the following items of business because it is likely that if members of the public were present there would disclosure to them of exempt information as defined in paragraph 3 of Part I of Schedule 12A to the Act and the public interest in withholding the information outweighs the public interest in disclosing the information to the public.

Reason for taking the items in private:

Paragraph 3 – information relating to the financial information or business affairs of any particular person (including the authority holding that information)

A representation was received as to why the item, Swindon and Wiltshire Strategic Housing Market Assessment (SHMAA) and Functional Economic Market Area Assessment (FEMAA), should not be held in private. The response is given in the minute of the relevant item below.

121 Chippenham Station Hub update (Part ii)

The information contained in the additional paper was noted.

122 Swindon and Wiltshire Strategic Housing Market Assessment (SHMAA) and Functional Economic Market Area Assessment (FEMAA)

Councillor Toby Sturgis presented the report which asked Cabinet: to consider the draft Strategic Housing Market Assessment and Functional Economic Market Area Assessment; and to agree to their publication as part of the evidence base to inform the review of the Wiltshire Core Strategy.

Prior to consideration of the item, and in a response to a representation from a member of the public, the council's Monitoring Officer confirmed: that the paper had been made exempt from publication due to the documents being in draft form; that this was done in the public interest and in the interest of Wiltshire Council and Swindon Borough Council; and that the full documentation should be published in October once it had been agreed with Swindon Borough Council.

Following a short debate, the meeting;

Resolved

- i) To approve the draft Swindon and Wiltshire Strategic Housing Market Assessment and Functional Economic Market Area Assessment for the purposes of evidence for the review of the Wiltshire Core Strategy.**
- ii) To publish the Swindon and Wiltshire Strategic Housing Market Assessment and Functional Economic Area Assessment on an agreed date with Swindon Borough Council, with a clear explanation of their status in the plan making process and planning system.**
- iii) To delegate authority to the Associate Director for Economic Development and Planning in consultation with the Cabinet Member for Spatial Planning, Development Management and Property and Swindon Borough Council to determine the agreed date for publication.**

Reason for Decision:

To ensure that the Council can make timely progress on the proposed review of the Wiltshire Core Strategy.

123 Housing Repairs Contract Extensions

Councillor Richard Clewer presented the report which sought to gain approval to extend four contracts for planned and responsive repairs services to council housing stock up to March 2020. This would enable sufficient time to fully review current services, agree a new model for service provision and implement the new proposals.

Following a short debate, the meeting;

Resolved

That approval be delegated to the Associate Director responsible for housing in consultation with the Cabinet Member for Economic Development and Housing to agree contract extensions up to March 2020 for the four contracts delivering the following services;

- Planned and cyclical maintenance**
- Planned and responsive gas works**
- Planned and responsive electrical works**
- Responsive repairs and voids works**

Reason for Decision:

The responsive repairs and planned maintenance services for council housing stock are currently under review. A proposal to reshape services was approved in principle by Cabinet in March 2017 subject to a further report to Cabinet to confirm the business case for the revised proposal.

The current contracts are due to end in March 2018. All four contracts were awarded with the option to extend. As more time is required to conclude the business case to reshape services and report back to Cabinet, it is proposed that the current contracts are all extended to enable sufficient time to fully consider the implications of the service change proposals.

(Duration of meeting: 9.30 am - 12.23 pm)

These decisions were published, earlier, on the 14 September 2017 and will come into force on 22 September 2017

The Officer who has produced these minutes is William Oulton of Democratic Services, direct line 01225 713935, e-mail william.oulton@wiltshire.gov.uk

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

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Wiltshire Council

Cabinet

10 October 2017

Subject: Proposed changes to the Councils Allocation Policy

Cabinet Member: Councillor Chuck Berry - Cabinet Member for Economic Development and Housing

Key Decision: Yes

Executive Summary

An identified priority last year was to both upgrade our existing IT system and review our social housing allocation policy and make recommended changes for improvement. This report provides an update on the IT upgrade as well as recommendations following a consultation to make amendments to our existing policy.

It is recommended the Cabinet approve recommendations 1 -11 and option 2 for recommendation 12, Option 1 for Recommendation 13 and note recommendation 14.

Proposal

To consider the recommendations to amend the council allocation policy and make a recommendation to Council to update the policy

Reason for Proposals

To make improvements to the allocation policy in line with recent recommendations following recent consultation as well as welfare reform and legislative changes to help make the system more effective and efficient.

Alistair Cunningham, Corporate Director

Wiltshire Council

Cabinet

10 October 2017

Subject: Proposed changes to the Councils Allocation Policy

Cabinet Member: Councillor Chuck Berry - Cabinet Member for Economic Development and Housing

Key Decision: Yes

Purpose of Report

1. To consider the recommended changes to the allocation policy and make a formal recommendation to cabinet for adoption, noting the progress in regard to the IT upgrade

Relevance to the Council's Business Plan

2. The council's allocation policy helps to deliver on the council's vision to create stronger and more resilient communities by ensuring we make best use of our social stock and allocate to local people. This will also help bring communities together to enable and support them to do more for themselves which is a key priority within the plan.

Background

3. The Homes4Wiltshire (H4W) policy was developed in partnership with Wiltshire Council and 32 other housing providers who have social housing stock in Wiltshire. The policy is used for letting and selling affordable housing and allows applicants to make informed choices about the type of accommodation that best meets their housing needs and aspirations. The policy meets the statutory requirements for the allocation of social housing and the recommendations include suggested amendments following consultation, legislative changes, welfare reform and customer feedback and learning from complaints received.
4. The recommended changes in this document have been discussed and agreed with providers in meetings throughout 2016 and the start of 2017 as well as a 9 week external formal consultation period from January 17 to April 17, which generated 157 snap responses and 12 responses after the consultation closed.

Main Considerations for the Council

5. When the new allocation system went live on 3rd February 2015 we had a total of 1184 on our housing register who were identified as having a housing need and at the end of Qtr 1 (30th June 2017) we had 2340 which is an increase of 97.6%.

5.1 Below is a breakdown of the register taken on 1st April 2015 as well as a more recent breakdown from 1st July 2017. It shows the number of applicants on the register by band; Band 1 and 2 are the highest need while the open market register is those applicants with no identified housing need.

| 1 st April 2015 | | 1 st July 2017 | |
|--------------------------------------------------------------------------------------------------|------|---------------------------|------|
| Band 1 | 129 | Band 1 | 172 |
| Band 2 | 7 | Band 2 | 8 |
| Band 3 | 564 | Band 3 | 812 |
| Band 4 | 484 | Band 4 | 721 |
| | 1184 | | 1713 |
| OMR* | 141 | OMR* | 627 |
| *OMR – Open Market Register. This is the register for client who have no identified housing need | | | |

5.2 Applicants on the open market register make up just over 27% of the register. This is an area that we have recently prioritised to increase numbers by working with local housing providers, developers and parish councils on a marketing campaign to try and increase demand in areas where new developments are taking place. We have now introduced a much simpler process to register on the open market register which requires less documentation to be provided by the applicant and significantly reduces the administration burden on the H4W staff.

Recommended Changes

5.3 In producing the recommended policy changes we have carried out a 9 week external consultation as well as consulting with housing managers and staff, the housing providers through the Homes4wiltshire partnership, other internal departments as well as considering the learning from a number of complaints and reviews we have dealt with since the revised policy was implemented

Below is a list of the 14 recommended changes

6.0 Recommendation One

6.1 An additional section has been included (Section 4.7) to clarify the situation for single applicants aged under 21 who due to the changes in Welfare Reform have no entitlement to housing costs, and although they can still join the register they will need to satisfy the landlord that they can pay the rent and meet their living costs as well as for those single and aged under 35 who are subjected to single room rent.

6.2 From the 1st April 2017 the government introduced through the Welfare Reform Act 2012 that most single applicants aged 18 – 21 years old who claim universal credit are no longer entitled to assistance with rent costs. The government has however introduced some exclusions which include, those who are claiming Personal Independence Payment or the care component of medium or high rate Disability Living Allowance, care leavers before the age of 18 and for those in temporary accommodation.

6.3 This recommendation has been supported by all Housing providers across Wiltshire and is something that they currently consider when doing shortlists for this age group.

7.0 Recommendation Two

7.1 Due to issues associated with the current definition and interpretation of what unacceptable behaviour is we have strengthened the wording in section 4.8 to make it easier for officers to apply and applicants to understand.

7.2 This recommendation has been supported by the Housing Providers, however one identified some minor issues with the wording and a response was provided as detailed in Appendix 2 p3.

8.0 Recommendation Three

8.1 We have also suggested a number of amendments in section 4.9 to strengthen the wording in regard to rent arrears and housing related debt to explain that even if applicants with rent arrears are able to join the register, some housing providers may still refuse them due to having rent arrears even when a 6 month repayment programme has been maintained.

8.2 Due to Universal Credit being paid in arrears of around 4-6 weeks, we will start to see an increase in the number of applicants who will have current rent arrears.

8.3 A recommendation from the Pause Pilot* operational and strategic group has been included in section 4.9.4 which confirms a reduction in the exclusion period from 6 months to 3 months for those who are successfully engaging with the Pause Pilot*

**Pause Pilot - Pause works with women who have experienced – or are at risk of – repeated pregnancies that result in children needing to be removed from their care. The programme gives women the chance to pause and take control over their lives, breaking a destructive cycle that causes both them and their children deep trauma.*

These amendments have been supported by our housing providers with some minor amendments to the wording of this section.

9.0 Recommendation Four

9.1 We have suggested some changes in regards to the references to fraud in section 4.11 to explain that the council takes it very seriously and appropriate action will be taken

This recommendation has again been fully supported

10.0 Recommendation Five

10.1 To assist further with the understanding of section 4.13.3 we have further defined within our exclusion group* the definition of someone who is homeless, those fleeing abuse and a person from the transient community.

**Exclusion Group - If an applicant meets any of the definitions defined within 4.13.3, a local connection to Wiltshire will not be required to qualify for the register and they will be considered as households in the 'local connection exclusion group'.*

10.2 An amendment has been recommended by the Armed Forces task and finish group for armed forces personal to remove the requirement to have left the army within 5 years and to apply the exclusion to anyone who has served in the armed forces and to also include separated or divorced spouse who is being asked to leave services family accommodation. This helps to further enhance our support for those who have served in the Armed Forces

10.3 As part of the recommendation from the Armed Forces task and finish group we have suggested that a minimum service time of at least three years should be included as well as an exclusion if the officer had been dishonourably discharged. We would also like to see that for those being considered after the 5 years they should be able to confirm a connection to Wiltshire as this is an additional benefit above the statutory requirement and should benefit those with a connection to this area.

10.4 The suggested re wording would be:

- a person who has left the Armed Forces within the last 5 years or
- any veteran who can demonstrate a connection to Wiltshire as well as serving a minimum of three years and who has not been dishonourably discharged,

11.0 Recommendation Six

11.1 We have amended the wording in Section 4c, 4.14 to help clarify the financial resource limit for all applicants to ensure that if they have the financial resources available to meet their housing need in the market place they will not be considered as having an identified housing need.

11.2 This recommendation has again been fully supported with some minor amendments being made to the wording

12.0 Recommendation Seven

12.1 To clarify in more detail and update the examples in regard to the definitions in S4.17 for deliberately worsening circumstances.

This was included as part of the consultation feedback

13.0 Recommendation Eight

13.1 We have clarified in S5.1 on how we will assess who a dependent child resides with as her/his main or principal home.

No issues or concerns were raised throughout the consultation on the revised wording

14.0 Recommendation Nine

14.1 Due to increasing number of applicants wanting to share a home to provide mutual support/minimise living costs we have expanded S6.1 of the policy to provide greater clarity for customers and staff

No issues or concerns were raised throughout the consultation on the revised wording

15.0 Recommendation Ten

15.1 In section 9.4 and 9.5 we have worked with housing providers to provide improved wording in regard to the development of local lettings and sensitive letting plans.

15.2 We have also included an additional section s10.1 for when direct lets can be used on occasions where it is unreasonable for an existing tenant to remain in her/his home because of harassment or violence and it would be considered a risk if they were to remain

This recommendation has again been fully supported with some minor amendments being made to the wording

16.0 Recommendation Eleven – Banding changes

16.1 To reinforce our commitment to Armed Forces personnel and to strengthen the use of Band 2 we would like to remove section 8.4 and 8.5 from the policy and insert an additional section in Band 2 to re confirm our priority to injured, sick or disabled serving or former armed forces personnel. The suggested wording for Band 2 is:-

16.2 In accordance with the legislation (section 166A(3) of the 1996 Act) as amended by Regulation 2, applicants who are confirmed as being someone from the reasonable preference category, have an urgent housing need and who meet one of the following criteria:

- a) a person serving in the regular forces who is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person's service, or
- b) a person who has recently ceased, or will cease to be entitled, to reside in accommodation provided by the Ministry of Defence following the death of the person's spouse or civil partner who was serving in the regular forces and whose death was attributable (wholly or partly) to that service, or
- c) a person serving or formerly serving in the reserve forces who is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person's service.

And Band 4 will read:-

16.3 In accordance with the legislation (section 166A(3) of the 1996 Act as amended by Regulation 2, applicants who are confirmed as being someone from the reasonable preference category, have an urgent housing need and who are a person formerly served in the regular forces.

16.4 This amendment has been strongly supported with 68% of those responding either strongly agree or agree with this amendment and only 9% in disagreement. This amendment again helps to further enhance our support for those who have served in the armed forces

16.5 Due to our corporate parenting responsibilities it has been recommended that we introduce care leavers into Band 1 to provide them priority for re housing once ready to leave the care system into independent accommodation. Band 1 for care leavers will read:-

Applicants leaving care in a planned way where planned housing options have not been successful. The applicant must have been assessed as ready to move into independent living accommodation by both Children's Services and the Housing Department

16.6 This amendment has been strongly supported internally with 76% of those responding to the consultation either strongly agreeing or agree with this amendment and only 6% in disagreement.

16.7 Due to recent corporate pressures on residential placements it was suggested that we included a corporate duty section within Band 1. These are for exceptional cases and the suggested wording is:-

Referrals from both Adult Care and Children's Services will be considered under this band where it is identified that a corporate duty exists and it is demonstrated that an allocation will prevent a residential placement or a placement outside the council's area.

17.0 Recommendation Twelve

Options for a proposal to make the system more efficient

17.1 A proposal is being considered to remove from the definition of what is defined as having a local connection to Wiltshire in S 4.13.2 reference to having close family who have continuously lived in the Council area for 5 years or longer as well as removing this from S 9.1.1 in the definition for a local connection to a parish or town as this has significant administration burdens and has caused a number of complications.

17.2 Although this wording received significant support during the last consultation we have experienced a number of issues since it was implemented. To be able to evidence if an applicant has a family member who has lived in a particular area for five years, the applicant will first need to evidence the relationship normally with both long and short birth certificates which when requested have cause a number of issues and complaints from applicants who don't have this evidence ready to hand.

Option One – Continue with current wording and operational procedure

17.3 The current process is extremely resource intensive and would require an additional member of staff in the Homes4wiltshire team to be able to manage the daily requirements to meet this recommendation. As well as confirming these connections at the point of application they need to be re-checked annually as family members move and family circumstances change. This is a significant administration burden that causes a number of complaints from customers.

Option Two – Retain current wording but discontinue with the authorisation process and just conduct random checks

17.4 The family local connection criteria is well liked by parish councils and rural provider's as it helps to build stronger communities with better support for families. To retain the wording but discontinue with the required checks would make the process very streamlined but would totally rely on the honesty of the applicant. We could audit this by doing some random checks which would require no additional resource but could lead to allocations being made to those who have confirmed they have a connection but in fact they do not and this could create different complaints and potential unfair allocations as additional priority would have been awarded.

Option Three – Remove the family connection criteria from the policy

17.5 By removing the family connection criteria altogether we would remove both the risk of incorrect allocations if no checks were being made and would remove the administration burden that this criteria has created.

17.6 The consultation feedback we received was very 50/50. We had 41% of responders confirming that this should remain in the policy and 40% agreeing it should be removed with 19% neither agree or disagree with this recommendation.

Our preferred recommendation would be Option 2.

Recommendation Thirteen

18.0 Rural Allocations of new build developments

18.1 During the consultation we had a number of concerns raised in regard to the allocations of new developments in rural villages. The current process for allocating any home is as follows -

Step 1 – Property is advertised to those in housing need from Bands 1 to 4, and bids from applicants with a connection to the parish / town are considered first

Step 2 – If we are not able to find someone with a local connection in Bands 1- 4 we then look at those applicants with a local connection to the surrounding parishes

Step 3 – We then open the criteria to those with a local connection to Wiltshire Council's area as a whole

Step 4 – Once all three steps above have been completed we will advertise to those in the Open Market Register (OMR) who have no identified housing need in the following cycle

18.2 The reason some providers have raised concerns about this is that in rural villages some families will have moved out of the area and found a private let in a nearby town or village due to no stock being available at the time they needed a home. When the new development comes forward the families who have moved out the village will have a local connection but will be unlikely to have a housing need and will be awarded OMR as the current accommodation they are in is likely to be suitable.

18.3 Example:- a woman and her family may have left a village to live in the town due to no suitable housing in the village where her parents still live. She is living in a private let that is affordable and suitable but would like to move back to the village. Under our policy she would be in OMR as she has no housing need but she would have a connection to the village and couldn't be considered until bids from Housing Register applicants had been exhausted which would include those from outside the area

18.4 Suggested amendments to this process are as follows:-

Option One – Retain the current allocation process as explained in Steps 1 -4 above

Option Two – On new build rural developments where the development is not to meet the need at the edge of a larger adjoining settlement (Local Services Centre's, Small and Large Villages as described in the core strategy) allocate 25% of the allocations to go to those in Band 1-4 and from the OMR who have a local connection to the village at stage 1 only. This will allow for those in the OMR to have a chance to bid at the first stage when we are looking at those with a local connection to the parish, but also allowing for a higher % to go to those in housing need.

Options Three – For all rural new developments where the development is not to meet the need at the edge of a larger adjoining settlement (Local Service Centre's, Small and Large Villages as described in the core strategy) allow for bids from Band 1-4 and OMR at stage 1 on all allocations. This would mean that we would consider those with a local connection to the village but who have no housing need in OMR on all new rural developments but does not disadvantage those from Bands 1-2 who fall into the local connection exclusion group e.g. armed forces, statutorily homeless and those fleeing domestic abuse

Option Four – As above but to include the allocations of all rural properties in (Local Service Centres, Small and Large Villages as described in the core strategy)

18.5 We have taken into consideration the feedback from the consultation and would recommend Option 1 and retain our current allocation process giving priority to those in housing need with a local connection to the area

19.0 Recommendation Fourteen

19.1 For the Head of Housing Operations and People to commence a consultation exercise on how Key Workers might be included in the allocation policy as a priority group and bring back a recommendation to Cabinet in February 2018 on the options.

20.0 IT Upgrade

20.1 We have been running on version 6.4 of our IT system since 2010 and have not made any annual upgrades. We had none of the latest features and the system was becoming very inefficient and was no longer being supported by Abritas so caused a number of issues for providers and our staff. For the past 6 months we have been working on a revised specification and programme to upgrade to 8.5 which also comes with annual free upgrades. Version 8.5 is now in place and running effectively.

20.2 As part of the new upgrade which went live on 1st June it introduced the ability to bid on mobile phones. This was in place of the telephone bidding line which was no longer being used by applicants. In the 4 bidding cycles since we went live with the new system we received a total of 3391 bids and 1689 of these were made from a mobile phone device rather than the main Homes4Wiltshire site. This is 49.8 % of bids in that period and is enabling a more accessible and digital service.

21.0 Overview and Scrutiny Engagement

21.1 Environment and Select committee considered this report and its recommendation during its meeting held on 19th September 2017. Full support was provided for recommendations 1 – 11 and option 2 was supported in recommendation 12 and Option 4 for recommendation 13.

22.0 Safeguarding Implications

22.1 As a corporate parent it has been recognised that the local authority has a duty to ensure that care leavers are able to access and secure suitable accommodation once they are ready to live independently and therefore the policy has been amended to reflect this.

23.0 Public Health Implications

23.1 This report has no known health implications

24.0 Procurement Implications

24.1 The amendments contained within this report have no procurement implications

25.0 Equalities Impact of the Proposal

25.1 An EIA was completed during the consultation and development of this policy. Once the recommendation have been finalised the EIA will be completed.

26.0 Environmental and Climate Change Considerations

26.1 There are no significant environmental or climate change implications associated with this proposal

27.0 Financial Implications

27.1 The only direct financial impact of the changes discussed in this report would be if Cabinet recommend, Option 1 in Recommendation Twelve. This option however is not recommended by Housing Officers for reasons set out in the report. If the policy were to remain as it is and option one agreed then additional staffing is likely and there is no proposals as to how the circa £28k (including on-costs) for this post would be funded and as such it is not supported as a viable option.

28.0 Legal Implications

28.1 The Homes4wiltshire policy is considered to be a lawful policy and in line with the governments allocation framework. The recommended changes contained within this report are still within the government framework and would continue to be a lawful policy.

29.0 Risks

29.1 The risks associated with amending or not the allocations policy is minimal. If the policy is not amended the following risks are likely to apply

- Continued complaints in regard to the complex and difficult administration of the family local connection criteria, which will need appointment of an additional staff member to manage effectively
- We would not be able to amend the criteria associated with the armed forces which has been agreed at a task and finish group which was set up to review and improve the offer to armed forces personnel
- Clarity would not be provided in the policy for under 35s following the changes to Welfare Reform which could cause some confusion.
- The definition of unacceptable behaviour would continue to be interpreted in different ways along with clarity in regard to the wording around rent arrears, fraud, financial resource limit and deliberately worsening circumstances.
- We would not be able to improve our responsibilities in housing in relation to being a corporate parent and providing care leavers with additional priority within the policy.
- Continued complaints in regard to the allocation of homes in rural locations to those who have a local connection to the area but due to the current policy they are not able to bid for these homes

30.0 Options Considered

30.1 The options considered have been detailed in the report

31.0 Conclusions

31.1 To consider the recommendations to amend the council allocation policy and make a recommendation to Council to approve and adopt recommendations 1 -11, option 2 for recommendation 12, option 1 for recommendation 13 and note recommendation 14.

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26th September 2017

Appendices

Appendix One – Recommended draft Allocation Policy 2017

Appendix Two – Proposed changes to the Allocations policy – consultation responses

Appendix Three – SNAP survey consultation results

Background Papers

None

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1.0 Introduction

1.1 There is **high** demand for **most types of** affordable rented homes in Wiltshire Council's area. The purpose of the Allocation **Policy** to set a framework for Wiltshire Council and its partners for the registration and assessment of applicants for affordable homes and describes how prioritisation will ensure that those in greatest housing need are offered affordable housing in Wiltshire Council's area. During the development of this scheme we have had regard to our Tenancy and Homelessness **Strategies and relevant legislation -**

- Housing Act 1996, Part 6 and 7
- Homelessness Act 2002
- Localism Act 2011
- Housing and Planning Act 2016
- Immigration Act 2014 (Right to Rent legislation)

2.0 Wiltshire Allocation Scheme aims

2.1 Wiltshire Council's allocation scheme aims to:

- Meet the Council's statutory duties in the allocation of **its own rented homes** and in making nominations to other affordable housing providers
- Create and maintain inclusive, balanced, and sustainable communities throughout Wiltshire Council's area whilst giving applicants as much choice and control as possible over where they live.
- Ensure that the scheme is transparent, fair and accountable
- Operate a customer focused scheme that is easy to understand and is accessible
- Ensure that available housing stock is allocated in a way that is responsive to the needs and demands of the community

3.0 Wiltshire's allocation scheme in brief

3.1 Wiltshire's allocation scheme is a Choice Based Lettings (CBL) scheme that covers the Wiltshire Council area. The scheme determines priorities and procedures for the allocation of affordable housing across Wiltshire Council's area, including:

- Eligibility and other qualifying criteria for registration
- Property size criteria
- How housing applicants' **housing need** will be assessed
- Banding structure that determines how housing applicants will be prioritised
- How homes will be allocated

3.2 The scheme allows all housing applicants a choice of accommodation along with the opportunity for them to express a preference about the type of accommodation they prefer.

3.3 Whilst all housing applications are assessed in the same way, and determine admission to the Housing Register, all housing providers have different criteria to let their homes, operating individual lettings policies. The council works with these providers with a view to achieving some consistency in the overall approach for the allocation of properties.

3.4 All housing vacancies from Wiltshire Council and other providers are advertised on a weekly basis. Any household registered with Homes4Wiltshire can 'choose' to apply for homes for which they qualify in terms of size, facilities, age criteria, design and need, a process known as "bidding".

3.5 Applicants must meet the criteria for the vacancy and bid for the property during the advertising period. A shortlist will be run at the end of the bidding period and selection of the successful short-listed applicant is based on the following, in strict order –

- her/his ability to meet the stated criteria for the advertised home
- connection to the parish where the advertised property is located or an adjacent parish
- band (reflecting their housing need) and
- finally the length of time they have been in that band

3.6 Elected council members cannot take part in the assessment and allocation process but this does not prevent them from seeking or providing information on behalf of their constituents or being involved in future policy development.

3.7 Wiltshire Council's allocation scheme considers applications from people in housing need only. Housing need is based upon current housing circumstances and any change of housing circumstances will affect housing applicants' entitlement to priority for re-housing. Where housing applicants are not in housing need, the council maintains a separate list known as the Open Market Register, allowing applicants to express an interest in Low Cost Home Ownership opportunities and in specialist accommodation for older people or disabled people.

4.0 Eligibility Criteria

4.1 Anyone can approach the council for housing advice and assistance. However, the amount of social housing in Wiltshire Council's area is limited, and the capacity of the social rented system to meet housing need will not support large volumes of applications from people without a connection to the area or a good reason to live here.

4.2 The eligibility criteria complies with sections 160ZA(2) and (4) of the Housing Act 1996. Most people subject to immigration control, and certain other people from abroad excluded by law or regulation, are not eligible for an allocation of accommodation.

For more information on this please see Appendix 1.

4.3 In some instances a person may be eligible despite being subject to immigration control. The council will disregard as members of the household those who are 'restricted', such as those who are:

- Not eligible
- Those who are subject to immigration control
- Those with no leave to enter or remain in the UK
- Those with leave but subject to a condition of no recourse to public funds

4.4 For households eligible to be re-housed only because of the housing need of the restricted person, the Council has a duty to arrange as far as practicable, an assured shorthold tenancy with a private landlord.

4.5 If the main applicant is eligible and not subject to immigration control, non-eligible dependent children and other dependent family members will be taken into account. Non-dependent adult children, live in carers and close relatives who form part of the household may be taken into account depending upon the circumstances.

Applicants who do not qualify

4.6 There are some applicants who will not qualify to join the register. They include:

| | | | |
|----|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|------------|
| 1. | Unacceptable behaviour | Applicants who have caused unacceptable behaviour serious enough to make them unsuitable as a prospective tenant | Section 4a |
| 2. | Connection to Wiltshire Council's area | Applicants who do not meet the criteria or connection to live in Wiltshire Council's area | Section 4b |
| 3. | Financial resource limit | Applicants who have assets or income above the financial resource limit | Section 4c |
| 4. | No identified housing need | Applicants who have no identified housing need | Section 4d |
| 5. | Housed within the last 12 months | Applicants who have been housed within the last 12 months | Section 4e |
| 6. | Those who have deliberately worsened their circumstances | Applicants who have deliberately worsened their circumstances | Section 4f |

4.7.1 Applicant's who are single and are aged 21 or under, may join the housing register. However, due to changes in the welfare system, they may not qualify for help with their housing costs and will need to satisfy housing providers they can pay their rent and meet their other living costs.

4.7.2 Applicants who are single and aged under 35 will be subject to the single room rent and will need to satisfy providers that they will be able to afford the tenancy in the long term.

4.7.2 Applicant's aged under 16 will not be able to join the register. Applicants aged 16 and 17 are required to have a responsible adult to hold the tenancy in trust until they reach the age of 18. The young person has to demonstrate s/he has the relevant skills to care for her/his home and maintain a tenancy. Registered providers may require the young person to have an adult to act as a guarantor. The guarantor is personally liable for any issues with the conduct of any tenancy granted, such as rent payments in the event of a tenant defaulting.

4a Unacceptable behaviour

4.8. If an applicant or a member of his/her household has been guilty of unacceptable behaviour within the previous 12 months which makes her/him unsuitable to be a tenant, s/he will not qualify to join the register unless there is professional evidence that the applicant has committed to change her/his and has support to do so. Unacceptable behaviour includes, but is not limited to –

- Recorded anti-social behaviour in the last 12 months where the applicant was issued with a formal warning, an acceptable behaviour contract or an order made under the anti social behaviour legislation
- Other behaviour in the last 12 months where the applicant or a member of his or her household has caused a nuisance or annoyance by which has affected neighbours or members of the local community in which s/he lives or has lived
- Incidents of domestic abuse, harassment on grounds of race, ethnicity, gender, age, disability, religion, gender identity or sexual orientation, any threats of and/or actual violence to people or damage to property or any activity potentially threatening the community will be considered unacceptable behaviour.
- Possession proceedings or other legal action taken or pending by a professional agency or landlord in direct consequence of anti-social behaviour will be taken to constitute evidence. Legal action includes, but is not limited to, formal action under the anti-social behaviour legislation and the service of notice on the ground of anti-social behaviour. Convictions, cautions and bind overs for offences likely to make someone unsuitable to be a tenant will be considered as evidence too.

Housing Related Debt

4.9 If an applicant or joint applicant has any housing related debt, including any damage recharges, rent arrears or possession costs, they will be excluded or suspended from the Housing Register or Open Market Register until they have maintained a repayment plan for 6 consecutive months and/or cleared the majority of the debt. If an applicant owes multiple debts to different landlords it is expected that they maintain repayment plans for them all. Applicants ought to note that, whilst they may fulfil these repayment criteria, this does not mean that a housing provider will necessarily offer accommodation. Each housing provider has its own Lettings Policy and approach to housing related debt.

4.9.1 If an applicant who had been maintaining a repayment plan stops paying in accordance with that repayment plan, s/he will be excluded from the register until they have maintained payments for a further 6 consecutive months. If the applicant is in the Band 1, s/he will be excluded from the register until they have maintained payments for 3 consecutive months rather than 6 consecutive months. The purpose of these more flexible arrangements is to reflect this group's acute housing need.

4.9.2 Any existing social housing tenant who is in rent arrears solely as a consequence of the spare room subsidy will not be excluded or suspended from the register for having rent arrears as long as they are contributing towards the shortfall

4.9.3 If it can be confirmed that the rent arrears have occurred through no fault of the applicant, s/he will not be excluded or suspended from the register, but housing providers may choose not offer to accommodation while the arrears are outstanding.

4.9.4 If an applicant has successfully been engaging in the Pause Pilot programme for a period of 3 months, is confirmed as ready to live independently by a professional person in the programme, and has shown positive engagement as well regular repayments towards any former housing debt, then she will not be excluded from joining the register. She will be excluded from the register until she has maintained payments for 3 consecutive months rather than 6 consecutive months. The purpose of these more flexible arrangements is to reflect this group's acute housing need.

Prison

4.10 An applicant presently serving prison sentences are not permitted to join the register until a confirmed discharge date has been provided and she or he is within 28 days of discharge. Any active applicant who is currently serving a prison sentence will be suspended from the register until a confirmed discharge date has been provided and s/he is within 28 days of discharge.

Fraud

4.11 Where housing applicants seek to secure social housing by making false statements or failing to divulge information about who they are, where they live, who lives with them and their housing and financial resources is fraud and a criminal offence. Wiltshire Council will proactively investigate any allegations of fraud where the evidence indicates that housing applicants have not been truthful in their applications. Investigations in partnership with the housing providers in the Wiltshire Council area may take place if evidence comes to light after a tenancy is granted that a tenancy has been obtained under false pretences. Other fraud, for example in the completion of a homelessness application form or a form for help with housing costs, illegal subletting or any fraud leading to an eviction that has already taken place, will be considered in the same way.

4.11.1 Following an investigation, if it is satisfied that there has been an intent to commit fraud to secure housing to which the applicant would not otherwise be entitled, Wiltshire Council may prosecute the housing applicant and/or, where a

tenancy has been granted, co-operate with the provider in seeking possession and evicting the tenant. In cases of housing applications, the person concerned will be excluded from the register for a period of 12 months from the date that it was proved. Any such decision can be appealed (see Section 11).

Refusal of a notification of nomination or offer of direct let

4.12 Any applicant who has unreasonably refused two properties following a notification of a proposed letting from a nomination or direct let by the council or a registered provider (either by telephone, email or letter) that is deemed suitable for the household will be suspended from the register for a period of 12 months from the date of the second suitable offer, unless the applicant is or lacks mental capacity, excluding Band 1 applicants – See 4.12.2.

4.12.1 Any applicant in Band 1 receives one offer of suitable accommodation. Any applicant in Band 1 who has unreasonably refused one offer of suitable accommodation following a notification of a proposed letting from a nomination or direct let by the council or a registered provider (either by telephone, email or letter) is suspended from the register for a period of 12 months from the date of the second suitable offer, unless the applicant lacks mental capacity. It is the council's decision in the particular case whether the offer of accommodation is suitable. These decisions carry a right of appeal.

4.12.2 Autobids are automatic bids placed on vacant properties that meet the needs of an applicant who is not able to place bids themselves. Any applicant placing bids automatically by use of the autobid feature of the computer system would not be excluded for refusing suitable properties, unless s/he is in Band 1.

4.12.3 Automatic bids will be placed for any applicant in Band 1 after 3 months in the band because the household is in acute housing need and will have restricted reasons for refusal relating to suitability – see 4.12.1.

4b Agreed connection to the Wiltshire Council area

4.13 If an applicant does not meet the connection criteria to live in the Wiltshire Council area they will not qualify to register.

4.13.1 An applicant's individual circumstances will be considered when deciding if they meet the connection requirement to live in the Wiltshire Council area, and will comply with any appropriate statutory guidance. This includes the statutory guidance regarding members of the Armed Forces and Reserve Forces.

4.13.2 A connection to live in the Wiltshire Council area is defined as any person:

- Who is currently resident in the Wiltshire Council area and has continuously lived in the Wiltshire Council area for the past two years; or
- Who is in permanent paid employment or has a fixed term contract for a minimum of one year in the Wiltshire Council area; or
- Who has an offer of paid employment for a minimum period of 12 months in the Wiltshire Council area; or

- Who is self-employed and works predominantly in the Wiltshire Council area; or
- With close family (grand-parents, parents, legal guardian, adult children or brothers and sisters) who have continuously lived in the Council area for 5 years or longer; or
- Who has a connection with the Wiltshire Council area through special circumstances, such as a need to receive specialist medical services, services in the area which are not provided elsewhere or support from a close family member, or
- Who is currently residing in the Wiltshire Council area and is placed in Band 1 for medical and welfare needs and does not meet any of the other connection criteria listed above.

Connection criteria exclusion group

4.13.3 If an applicant meets any of the definitions below, a connection to Wiltshire Council's area will not be required to qualify for the register, unless they are a veteran who left the army more than 5 years ago, and will be considered as households in the 'connection criteria exclusion group':

- A person who is homeless within the meaning of Part 7, Housing Act 1996 to whom Wiltshire Council has accepted a full re-housing duty under Section 193(2) or Section 195(2) of the act, or
- A person to whom the full re-housing duty is owed where s/he is a homeless applicant re-applying after a private rented sector offer under S195A(1) of the above Act, regardless of whether the applicant has a priority need and where
 - (a) the person makes a re-application for assistance within two years of accepting a private rented sector offer, and
 - (b) is eligible for assistance and has become homeless unintentionally or
- A person who was provided with accommodation in Wiltshire Council's area under section 95 of the Immigration and Asylum Act 1999, or
- A person who is serving in the Armed Forces, or
- A person who has left the Armed Forces within the last 5 years, or
- any veteran who can demonstrate a connection to Wiltshire as well as serving a minimum of three years and who has not been dishonourably discharged, or
- A bereaved spouse or civil partners of members of the Armed Forces leaving services family accommodation following the death of their spouse or partner, or
- A separated or divorced spouse who is being asked to leave services family accommodation in the Wiltshire area
- Serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service, or
- A person who is being accommodated through an official witness protection scheme authorised by the Home Office, or
- A person who has been confirmed as having suffered domestic abuse and who needs to move to the Wiltshire Council area or from one part of Wiltshire Council's area to another to ensure his/her safety or a person who has suffered any other violent assault or threat of violence making his/her home unreasonable to occupy under Part 7, Housing Act 1996, or

- A person from the transient community or a household leaving armed forces accommodation who does not have a connection to another Local Authority area which would confer upon her/him the right to join that Local Authority's Housing Register, or
- A person who has been accommodated outside the area by Wiltshire Council in exercising its statutory duty to accommodate, or
- A person with a connection to an adjoining parish that is outside of Wiltshire Council's area but whose housing need has been used to develop affordable housing within a parish in the Wiltshire Council area. These households will only be allowed to bid for properties within the parish identified to meet their housing need, or
- A person who has been verified as a rough sleeper, where there is proof of rough sleeping in the Wiltshire Council area, where the person has no connection with another Local Authority area as defined by S199 Housing Act 1996

4c Financial resource limit

4.14 This section is waived for those applicants who require extra care housing or supported housing as well as any applicant who has received a lump sum payment in respect of compensation for an injury or disability.

4.14.1 Applicants with sufficient financial resources available to meet their housing needs in the areas of the district in which they live will not qualify to join the register. Any income, savings and investments will be taken into account when calculating the financial resources available. Appendix X sets out how the principles are applied.

4.14.2 Consideration will be given to applicants who have deliberately or intentionally disposed of capital on a case by case basis.

4.14.3 Each individual housing provider will apply its own financial assessment under its own Lettings Policy in the course of a pre tenancy assessment. Providers may differ in these assessments when determining whether a particular allocation is affordable for a particular applicant.

4d People who have no housing need

4.15 Any applicant who has no identified housing need – i.e. any applicant who does not meet any of the banding criteria as specified within the scheme will not qualify to join the Housing Register. Those that do not qualify for registration may have the option to express an interest in other forms of housing – see section 10.0.

4e Housed within the last 12 months

4.16 Any applicant who has been housed by a housing provider within the last 12 months and has no material change in housing circumstances will not qualify to join the Housing Register or the Open Market Register.

4f Deliberately Worsening Circumstances

4.17 Where there is evidence that an applicant has deliberately worsened their circumstances in order to join the Housing Register or qualify for higher banding, the application will be suspended from the register for a period of 12 months.

4.17.1 Examples of the deliberate worsening of circumstances include (but are not limited to) are

- Selling a property within the last 12 months that is affordable and suitable for the applicant's needs in order to be able to join the housing register or qualify for higher bands on the register
- Moving from an assured/assured shorthold tenancy to insecure, overcrowded accommodation with family or friends within the last 12 months in order to qualify for higher band
- Moving family member(s), friend (s) and/or any other household into the current home, within the last 12 months where there is no need, including cases where this conflicts with agreements with any landlord

4.17.2 For an applicant to have deliberately worsened their circumstances where accommodation has been left, there must be evidence that it would have been reasonable for the applicant to have remained in that accommodation and that the accommodation would have continued to be available to her/him.

5.0 Dependent children

5.1 The decision by the council about whether a dependent child resides with an applicant is considered on the facts. A dependent child's residence is generally considered to be the home where s/he lives and is cared for by a parent or parents, a guardian or another person with whom the parties with parental responsibility or its legal equivalent have agreed that s/he may live. Facts about where the child sleeps, attends school and undertakes her/his studies may be considered were two parties state that a child lives with them.

Relevant evidence will include but it not limited to –

- Payment of Child Benefit to the applicant
- Confirmation of the child's residence from relevant professionals (social worker, health visitor, doctor, head teacher)

5.2 In the case of divorced or separated parents/guardians, if the child does not reside with the applicant as her/his main and principal residence on the facts in 5.1 above, the application cannot include the child. Where a child is co-resident with two parents, if the child is already adequately housed with one parent, s/he cannot be included on the housing application of the second parent.

6.0 Sharing a home to provide mutual support/minimise living costs

6.1 Joint applications from relatives, friends, carers or companions who are not partners, who have a established relationship (for example, who have lived with each other for 12 months or more or been associated for a long period) and would be providing mutual support will be considered where the applicants' aim is to create a

sustainable tenancy. NB It must be noted that most providers will not consider granting tenancies where people have lived together for less than 12 months.

6.1.1 Applications where a carer and/or an extended family member whose presence is to facilitate care or support are included and considered on a case by case basis. A carer or extended family member could be included on an application, up to a maximum of 4 household members, subject to the following conditions:

- The applicant and carer (or extended family member) would provide mutual support to create a sustainable tenancy and;
- The applicant (or extended family member) has a significant medical need or disability and/or;
- The applicant requires overnight care

6.2 This could apply when an applicant has a physical disability, learning disability or a mental health problem. We will request evidence that members of the household currently live or intend to live with the applicant. This can include (but is not limited to) a signed statement of fact, adequate evidence of residence or confirmation from social services.

7.0 Property Size Criteria

7.1 Applicants must meet the criteria for the size of property they are applying for in line with the guidelines below. This is to ensure full occupancy of properties and to reduce those under occupying properties, making the best use of the housing stock.

7.2 Our bedroom matrix has been developed in accordance with the size criteria set out in Housing Benefit Regulations 2006, and Universal Credit Regulations 2013, as amended determining the maximum rent rules for Housing Benefit and housing costs element of Universal Credit -

- One bedroom per couple or single person
- One bedroom for any other adult aged 16 or over regardless of sex
- One bedroom for two children aged under 16 years of same sex
- One bedroom for each child aged 10 to 15 years of different sex
- One bedroom per two children aged less than 10 years old regardless of sex
- An extra bedroom for an applicant who requires overnight care
- A foster child will be allocated his / her own bedroom regardless of age and sex
- Any disabled child who for medical reasons requires his / her own bedroom.

As the above regulations do not apply to those over pensionable age, those over pensionable age will be able to apply for either a 1 or 2 bedroom property.

The full bedroom matrix can be found in Appendix 2.

8.0 Allocation Framework

8.1 The banding structure sets out the preferences in allocating housing accommodation. It will prioritise all advertised properties to those with parish

connections to the parish in which properties are located (see Section 9.2), to the immediate surrounding area and in greatest housing need, unless the property is allocated as part of a local lettings plan, sensitive lettings plan, a single sensitive let or a letting on a rural exception site. There are four bands, Band 1, Band 2, Band 3 and Band 4, with a further Open Market Register group that will not form part of the Housing Register as this will be for households who would like to express an interest in a certain type of product such as low cost shared ownership or older persons' accommodation.

8.2 Households who qualify for Band 1 will hold the greatest preference, followed by Band 2, Band 3 then finally Band 4.

8.3 The Housing Act 1996 (as amended) requires local authorities to give 'reasonable preference' in their allocations schemes to people with high levels of assessed housing need who are defined as:

- a) People who are homeless within the meaning of Part 7 of the Housing Act 1996 (including those who are intentionally homeless and those not in priority need)
- b) People who are owed a duty by any housing authority under section 192(2), 193(2) or 195(2) of the 1996 Act (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any housing authority under s.192(3)
- c) People occupying in sanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
- d) People who need to move on medical or welfare grounds, including grounds relating to a disability, and
- e) People who need to move to a particular locality in the district of the housing authority, where failure to meet that need would cause hardship (to themselves or others)

BANDING STRUCTURE

8.6 The bands that are included within the policy and which determine a household's need is as follows:-

| Band | Eligible to Bid for all properties |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Band 1 (Emergency Need) | Statutory Requirement Move On Emergency Medical or Welfare need Care Leavers Corporate Responsibility |
| Band 2 (High Need) | Under Occupying and suffering financial hardship – transfers only Social Care Injured, sick or disabled serving or former Armed Forces personnel Move On Urgent medical and welfare need |
| Band 3 (Medium Need) | No Fixed Abode & Insecurity of tenure Temporary Accommodation Seriously overcrowded Medical and Welfare need Under Occupying in social housing Other Statutory requirements |
| Band 4 (Low Need) | Lacking or sharing facilities Overcrowded Armed Forces Intentionally homeless Sheltered or Extra Care |
| Open Market Register | Eligible to bid on selected properties |
| | Low Cost Home Ownership Home Buy Shared Ownership Market rented properties Older people accommodation Specialist accommodation for those with specific needs |

A more detailed description of bandings can be found at Appendix 3.

9.0 Allocation of housing under Part 6 of the Housing Act 1996

9.1 Parish Connection

9.1.1 Homes will be allocated to applicants with a connection to a town or parish or where an area has an adopted neighbourhood plan priority will be given to applicants with a connection to the designated neighbourhood area as defined within the neighbourhood plan. A parish connection will be based on the following criteria:-

- *A person who is resident in the parish, town or city and has been resident in the same parish, town or city for the past 12 months, or*
- A person who is in permanent paid employment or has a fixed term contract for a minimum of one year or an offer of paid employment for a contract for a minimum of one year or is self employed and works predominantly in the parish
- *A person with close family (grand-parents, parents, legal guardian, adult children or brothers and sisters) who have lived in the parish or town for 5 years or longer.*

However for extra care properties the connection criteria will be defined within the extra care procedure to ensure that those in rural locations are not unfairly disadvantaged as all extra care schemes are located in towns and large villages.

9.2 Property Matching

9.2.1 The majority of vacant homes will be matched to the person who has a connection to an adopted neighbourhood plan area or to the town or parish and is in the highest band with the longest effective date. The effective date is the applicant's date of application that will change following a suspension of the application or a change in band. No applicant from the connection exclusion criteria will be overlooked for not having a connection to a particular parish or town as s/he has no connection to anywhere in Wiltshire Council's area.

9.2.2 If no applicant can be found who has a connection to the parish, town or neighbourhood plan area, the second allocation will be to any household with a connection to a surrounding parish or town where the two parishes and towns have a common boundary with each other. If no connection can be found to the surrounding parishes then the property will be awarded to the applicant with the highest band and earliest date in her/his current band.

9.2.3 Where a property for which an allocation is proposed is owned and managed by a housing provider, it is known as a nomination. The provider will apply its own current Lettings Policy to the decision, in the particular case, about whether to accept the nomination. The Lettings Policies of providers may include particular restrictions upon capital and past behaviours which vary from the policy of the council. In any case where a housing applicant disagrees with the decision of a provider to refuse a nomination, s/he must contact the provider directly and use the provider's appeals and/or complaints procedure.

9.2.4 Allocations made to specialist supported accommodation or extra care will be allocated based on meeting the advertised support and/or care needs for the property rather than by connection to the parish or town. A shortlist will be provided

identifying all applicants who are eligible for the vacancy to a specialist panel to determine the most suitable applicant for the scheme based on the level of support needed and the balance of existing residents.

9.2.5 The property must be both affordable and suitable for the applicant's needs before an offer is made. This will be assessed by the landlord of the property. Appendix 4 sets out acceptable reasons for a registered provider to refuse to accept an applicant.

9.2.6 If a property is constructed to accessible standard or has major adaptations making it suitable for a person with a physical disability and/or visual impairment, it will be matched to applicants with specific needs for the type of property advertised. Connections to parishes would not apply as the need for the adaptations in the property would override any connection to the area in which the property is located. Where an accessible or adapted property cannot be matched to an applicant with specific needs it will be allocated in accordance with the policy.

9.2.7 Extra care housing ¹properties will be matched to clients who have a specific care and support need rather than priority to a household with a connection to the area in which the scheme is located.

9.3 Planning agreements and former exception sites

9.3.1 In all cases, any vacant property will be advertised as per terms held within a planning agreement (any agreement made under Section 106 of the Town and Country Planning Act 1990 (as amended)) and/or planning conditions that apply to the site.

9.4 Local Lettings Plans

9.4.1 The Council or its partners may decide to let properties on a slightly different basis from normal in the interests of building strong and sustainable communities or to deal with particular local issues such as serious and repeated breaches of tenancy conditions in schemes and/or the serious and repeated anti-social behaviour of existing tenants which has caused the landlord, the local authority or the police to take formal action under the anti-social behaviour legislation.

This would apply for all new build properties on 1st let and in exceptional circumstances on future lets. The decision to apply a Local Lettings Plan will be jointly made by the landlord of the property and the Council. The allocation of housing accommodation will be made in accordance with local lettings policy. Local Lettings Plans may not include limiting the letting of units outside the terms described in 9.1 and 9.2 above.

9.5 Sensitive Lets

9.5.1 A 'sensitive let' may need to occur where, for reasons related to the behaviour of a former tenant who has been evicted, or serious and repeated breaches of

¹ Definition to be confirmed

tenancy conditions in schemes and/or serious and repeated anti social behaviour of existing tenants, there is a departure from the routine property matching process. For a property to be a sensitive let the housing provider must provide Wiltshire Council with proof that:

- the previous tenant was evicted or an eviction process had started because of anti social behaviour, had been guilty of criminal acts at the dwelling or in the area (this would include allowing the property to be used for selling or using controlled substances), abandonment where there had been anti-social behaviour or serious nuisance;
- the previous tenant was the victim of serious and long-term anti-social behaviour or other criminal acts; or housing officers or police had used all powers within housing, criminal and anti-social behaviour law to resolve the issues.
- The nature and location of the accommodation requires a sensitive let to ensure the scheme meets the ongoing needs of the residents e.g. a general needs property within a scheme for older people

10.0 Allocation of housing outside Part 6 of the Housing Act 1996

Part 6 of the Housing Act 1996 does not apply to the allocation of the following properties:

10.1 Direct lets made by housing providers

10.1.1 Subject to terms set out in the relevant stock transfer and nomination agreements, a small number of vacant properties will be directly allocated to an applicant rather than being advertised through the allocation system, including from the council's own stock. This may happen in the following situations:

- If a property is needed to house someone on a temporary basis
- In the case of a specially adapted property built for a specific person
- Decants, these are properties that need to be vacated for a specific purpose
- Where it is unreasonable for an existing tenant to remain in her/his home because of violence or a threat of violence which it is probable will be carried out, or serious harassment such that the tenant could not be expected to remain in the property (including harassment in relation to any protected characteristic under the Equality Act 2010), or the tenant's life is at risk if s/he remains in the property because of the risk to her/his health
- Where a homeless applicant has failed to bid or accept a property and needs to move from temporary accommodation
- Allocations of Supported Housing (vacancies are not advertised for bidding)
- A property has a layout that would allow adaptations to make the property suitable for a particular disabled person and their family, such provision to be made in complex and exceptional cases

- Emergency planning i.e. emergency accommodation due to a force of nature such as fire or flood.
- Properties required in support of a national government scheme such as the Syrian Refuge programme or anything similar where the Local Authority has agreed to assist
- Hard to let properties, where the properties have been advertised through the system but there have been no suitable bids
- Other reasons which are detailed in the registered providers own lettings' policies

10.2 Gypsy and Traveller Site allocations

10.2. Applicants for Gypsy and Traveller sites are not required to register through this allocation scheme. All enquiries for permanent pitches should be directed to the Council's Traveller Liaison Team who will issue an application form which will be assessed in accordance with the gypsy and traveller permanent site allocations scheme.

10.3 On acceptance to the register, applicants are required to notify the Council of any change in circumstances and ensure that up to date contact details are available to officer. The register will be reviewed every 6 months to ensure that applicants wish to remain on the list.

10.3 Low Cost Home Ownership / Shared Ownership / Home buy

10.3.1 Low Cost Home Ownership properties will be advertised for those who have expressed an interest in purchasing a share in a property. Applicants will be prioritised according to parish connection, banding then length of time on the register. For all cases affordability will be a key consideration. NB Applicants to note that most of the Low Cost Home Ownership properties advertised by the council are Discounted Market Units and a small number of shared ownership units. Applicants interested in Low Cost Home Ownership may find more properties advertised by Help to Buy South, the government's local Help to Buy Agent, and by individual local providers on their own websites.

10.4 Transfers

10.4.1 A transfer applicant is a secure tenant of Wiltshire Council or an assured tenant of a housing provider, resident in the Wiltshire Council area, who has requested a move to alternative accommodation within the area. Some allocations to existing social tenants do not fall within Part 6 of the Housing Act 1996 and so do not come under the usual allocation scheme. For Part 6 to apply to an allocation, special conditions must be met. These will be where:

- The allocation involves a transfer
- The transfer is made at the tenant's request and
- The housing authority is satisfied that the tenant has reasonable preference for an allocation

Additionally, transfers initiated by a housing provider for management purposes do not fall within Part 6.

10.4.2 Transfers will be banded according to this allocation scheme. If a transfer applicant does not meet any of the banding criteria they can express an interest for alternative accommodation and will become part of the Open Market Register group. These applicants will then only be able to bid for properties allocated for transfers or any other property advertised for the Open Market Register group.

11.0 Reviews and Appeals

An applicant has the right to request a review of decisions on the following:

11.1 S/he considers that s/he has not been awarded the correct banding or on any decision made about the facts of their case which has been, or is likely to be, taken into account in considering whether to make an allocation to them (s.166A(9)(b)).

Any review requests must be in writing and within 21 days of receiving notice of the banding status. Any necessary evidence or information must be supplied at this stage to substantiate the case that the council has made the wrong decision under the Allocation Policy based on the facts. Reviews of bandings will be undertaken initially by an appropriate officer of the council uninvolved in the original decision. If the applicant is still unhappy with the outcome, a further review will be carried out by a more senior officer. Customers who are unable to put their appeals in writing can arrange a meeting where the appeal will be heard and any supporting evidence can be considered.

11.2 Not having their application included on the register due to being ineligible for an allocation of accommodation under s160ZA (2) or (4) or is not a qualifying person under S160ZA (7).

In these cases a senior officer from the council who has not been involved in the original decision will carry out the review. As in 11.1 any review request will need to be made in writing and within 21 days of receiving notification. If the customer is unable to put their review request in writing they can request a meeting for their review to be heard and any supporting evidence to be provided.

If a customer is unhappy with a partner landlord decision to refuse her/him for an advertised property, s/he will be required to follow the landlord's appeal/complaints procedure.

APPENDIX ONE

Those not eligible to join the register

There are some households who will not be eligible to join the register. They include:

- People from abroad who are subject to immigration control as defined in s.13(2) of the Asylum and Immigration Act 1996

- People who are not habitually resident in the Common Travel Area, subject to certain exceptions as defined in Section 3.14 of the Allocation of Accommodation Guidance for Local Housing Authorities in England (2012)
- People whose only right to reside in the UK is derived from his status as a jobseeker. For this purpose, 'jobseeker' has the same meaning as for the purpose of regulation 6 (1) (a) of the Immigration (European Economic Area) Regulations 2006 (SI 2006/1003) *
- People whose only right to reside in the UK is an initial right to reside for a period not exceeding three months under Regulation 13 of the EEA Regulations above
- People whose only right to reside in the Common Travel Area is a right equivalent to one of the rights mentioned above highlighted * and which is derived from EU Treaty rights.
- People who have rights of residence in the UK as a result of regulation 15A(1) and (4A) of the Immigration (European Economic Area) (Amendment) (No 2) Regulations 2012 (the EEA Amendment Regulations)
- People who have a right derived from Article 20 of the Treaty on the Functioning of the European Union, in a case where rights of residence arise because a British citizen would otherwise be deprived of the genuine enjoyment of the substance of their rights as a European Union citizen

APPENDIX TWO

Bedroom size criteria

Below confirms the size of property a household can bid for, however on occasion an opportunity may apply when a household could under occupy, but this will be specified on any advert and would form part of a lettings plan.

| Household make-up | Bedroom Size | Bed spaces |
|--------------------------------------------------------------------------------------|--------------|------------|
| Single person | 1 | 1 |
| Couple | 1 | 2 |
| Couple or single and expecting a child within next 14 weeks | 2 | 3 |
| Two people not in a relationship but being accommodated together | 2 | 3 |
| Parent or Couple with 1 Child | 2 | 3 |
| Parent or Couple with 2 Children (both under 10yrs, regardless of gender) | 2 | 4 |
| Parent or Couple with 2 Children (both under 16yrs and same gender) | 2 | 4 |
| Parent or Couple with 2 Children (one of which over 10yrs but of a different gender) | 3 | 4 |
| Parent or Couple with 3 Children (all under | 3 | 5 |

| | | |
|----------------------------------------------------------------------------------------------------------------------|---|---|
| 16yrs) | | |
| Parent or Couple with 3 Children (one of which is over 16yrs and the other 2 are of different gender and over 10yrs) | 4 | 5 |
| Parent or Couple with 4 Children (all under 10yrs) | 3 | 6 |
| Parent or Couple with 4 Children (one of which is over 16yrs and the other 3 are of different gender and over 10yrs) | 4 | 6 |
| Parent or Couple with 5 Children | 4 | 7 |
| Parent or Couple with 6 or more Children | 4 | 8 |

An additional bedroom will be allocated to:-

- applicants who receive overnight care from carers who do not reside with them but are required to stay overnight for at least one night a week, where the applicants are in receipt of the relevant care or daily living components of Disability Living Allowance, Personal Independent Payment or any other benefit providing for care needs and would be entitled to another bedroom under the rules for help with housing costs.
- a disabled child where that child would normally share a bedroom under the rules above but will disturb the sleep of another child if obliged to share or another child with whom s/he would otherwise have to share will be at risk from the disabled child
- a disabled adult member of the household if an Occupational Therapist's report confirms that the care and/or recovery of the adult would be compromised by a failure to provide a separate bedroom and based on the 'bedroom matrix' she would not otherwise be allocated their own room. **NB** Any decision to admit anyone to the register on these grounds is subject to an affordability assessment at the point of allocation in light of the rules for help with housing costs
- to enable Children's Services to meet its S22G duty under the Children Act 1989 any approved prospective foster carer or adopter should be allocated the required bedroom size as recommended by Children's Services to ensure the family are allocated the correct size property to enable the family to foster a child or can continue to do so
- Those over pensionable age with a 1 bed need will be excluded from this criteria and will be eligible to bid for 1 or 2 bed properties.

However there may be restrictions on the amount of Housing Benefit or help with housing costs such applicants are eligible for. In these circumstances

Homes4Wiltshire will award the additional bedroom/s but individual landlords may apply a test of affordability before making an offer of accommodation.

APPENDIX THREE

Band 1

Band 1 is for households who need to be housed in emergency. This includes households for whom there is a specific statutory requirement of an immediate nature or for whom there is a serious risk to health, safety or wellbeing in the present living situation which cannot be resolved by other means.

Statutory Requirement

A household who is owed a duty by Wiltshire Council under the Housing Act 1996 Part 7 ss 193(2) or 195(2). These are households who have been accepted as statutorily homeless. A household which has been assessed as being statutorily overcrowded or is lacking more than 3 bedrooms (the bedroom matrix will be applied to assess overcrowding). A household to which the authority has a statutory duty to provide care which requires accommodation in which that care may be provided and an allocation will prevent a residential or out of area placement.

Emergency Medical or Welfare need

An applicant's health or social care needs either –

- cannot be met in the current accommodation to the extent that clinicians advise it will make the condition life threatening or will result in a life changing injury or condition
- where the applicant or a member of the applicant's household is terminally ill, cannot be met in the present housing conditions with dignity and respect
- cannot be met because the applicant's household has no accommodation to which s/he can safely return (patients ready for discharge from hospital and applicants in short stay rehabilitative care environments)

Care Leavers

Applicants leaving care in a planned way where planned housing options have not been successful. The applicant must have been assessed as ready to move into independent living accommodation by both the Children's Services and the Housing Department

Corporate Duty

Referrals from Adult Social Care and Children's Services will be considered under this band where it is identified that a corporate duty exists under social care legislation and it is demonstrated that an allocation will prevent a residential placement or a placement outside the council's area.

Band 2

Under-Occupying and suffering financial hardship

The applicant is a current social housing tenant of working age who is under-occupying by two or more bedrooms and who is suffering or would suffer financial hardship if s/he remained in her/his existing home.

Social Care

For an applicant to be able to provide or receive support in suitable accommodation. This would include foster carers, those approved to adopt, or those being assessed for approval to foster or adopt, who need to move to a larger home in order to accommodate a looked after child or a child who was previously looked after by a local authority. It would also include special guardians, holders of a residence order and family and friends carers who are not foster carers but who have taken on the care of a child because the parents are unable to provide care.

Injured, sick or disabled serving or former Armed Forces personnel

In accordance with the legislation (section 166A(3) of the 1996 Act) as amended by Regulation 2, applicants who are confirmed as being someone from the reasonable preference category, have an urgent housing need and who meet one of the following criteria:

- a) a person serving in the regular forces who is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person's service, or
- b) a person who has recently ceased, or will cease to be entitled, to reside in accommodation provided by the Ministry of Defence following the death of the person's spouse or civil partner who was serving in the regular forces and whose death was attributable (wholly or partly) to that service, or
- c) a person serving or formerly serving in the reserve forces who is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person's service.

Move on from supported accommodation

This applies to applicants in shared or supported accommodation where there is a move on protocol in place with the council. The applicant must have been assessed as ready to move into independent living accommodation by both the support provider and a housing officer of the council.

Urgent medical or welfare need

An applicant's or household member's functional ability or psychological state is severely compromised and the applicant cannot care for her-/himself in the home, where -

- that home cannot reasonably be adapted for her/his needs to maximise independence and the disabled person could be more independent in a more accessible home
- chronic or episodic ill health directly caused or exacerbated by the living conditions at home has required repeated clinical or care intervention in the past six months which in the opinion of clinicians could have been avoided had the applicant been adequately housed

- repeated admissions to hospital in the last 6 months (non-life threatening) are attributed to the current living conditions by clinicians

and a move to alternative accommodation would either ensure that the applicant can be properly cared for or will help improve their condition.

Band 3

No fixed accommodation & Insecurity of Tenure

These are applicants who have been confirmed as homeless with no fixed accommodation or threatened with homelessness by the council's Housing Options service. Applicants assessed as being insecure in their accommodation will generally be under a 2 month or 93 day notice period to vacate their accommodation.

Temporary Accommodation

Those applicants currently residing in temporary accommodation under part 7 of the 1996 Act and are awaiting a homeless decision

Seriously Overcrowded

Applicants living in overcrowded accommodation (in need of at least two additional bedrooms), the size criteria set out in Housing Benefit Regulations 2006, and Universal Credit Regulations 2013, as amended will be applied to assess overcrowding

Under Occupying in Social Housing

Applicants who are currently in social housing and under occupying by 1 bedroom under the size criteria set out in Housing Benefit Regulations 2006, and Universal Credit Regulations 2013, as amended and willing to move into a smaller home

Medical and Welfare grounds

Applicants who are suffering from serious harassment, violence, or threat of violence at their current property, providing evidence exists to substantiate their claim.

An applicant's physical safety and functional ability are compromised by the current living conditions and re-housing would prevent a future deterioration in functional ability or psychological state and promote independence and/or recovery. Relevant where the current home cannot be adjusted or adapted to meet these needs or where the housing conditions significantly contribute to social isolation (including an episode of illness requiring intervention of mental health or other clinical professionals during the past six months) or there is evidence that the immediate housing environment is causing the applicant emotional distress which cannot be relieved by standard clinical/therapeutic interventions.

Other Statutory duties

Any applicant who is owed a full housing duty by any housing authority under section 192(2), 193(2) or 195(2) of the 1996 Act or who are occupying accommodation secured by any housing authority under s.192(3)

Band 4

Band 4 would include households with a low need for accommodation.

Lacking facilities

Any households who is lacking either a bathroom, kitchen or inside WC.

Sharing facilities

Applicants who are sharing facilities and who have no security of tenure in their current accommodation.

Overcrowded

Applicants living in overcrowded accommodation (in need of one additional bedroom).

Armed Forces

Applicants from the Armed Forces currently stationed in the Wiltshire Council area, due to be discharged within the next 12 months, or, in accordance with the legislation (section 166A(3) of the 1996 Act as amended by Regulation 2, applicants who are confirmed as being someone from the reasonable preference category, have an urgent housing need and who are a person formerly served in the regular forces

Intentionally homeless

Any households who has been found intentionally homeless by Wiltshire Council's housing option team.

Sheltered Accommodation and Extra Care Housing

Those aged 60 or over that require sheltered accommodation or have an identified support need that would be best met in supported accommodation. May include younger people (eg 50 and over) with similar needs

Those aged 55 or over who require the support or care that would best be met in an Extra Care Housing scheme

APPENDIX FOUR

Acceptable reasons for a registered provider to refuse to offer a property to an applicant

Registered providers may refuse to accept an applicant nominated by Wiltshire Council. This can occur when even an applicant has been nominated for a property.

The circumstances when this could apply are, but not limited to:

- An applicant has bid for another property and accepted that property
- An application appears to be false or misleading and further investigation is required

- An applicant has evidenced support needs and does not have support **appropriate to those needs** in place
- An applicant has displayed threatening, violent or otherwise unreasonable behaviour, such as towards a member of staff or neighbouring tenant in the last 12 months
- Where there is evidence that an applicant might endanger the health, safety or well being of a community because of a history of violent or abusive behaviour against particular individuals in the area.
- Where an applicant is unable to provide evidence of access to sufficient funds to enable them to pay the rent and **meet their essential living costs** at the particular property.
- An applicant is unsuitable for the property because of a recent tenancy management issue at the property.
- An applicant has bid for a property that does not meet her/his immediate needs, eg an adapted property where the applicant does not need the adaptations provided or their needs that cannot be met without making considerable, unreasonable or inappropriate adaptations to the property.
- Where support or adaptations are provided which are not needed by the applicant or members of their household
- The property is subject to a local authority S106 Agreement and the applicant does not meet the required criteria
- The provider is unable to make contact with the applicant either by phone, email or letter over a period of 3 working days
- An applicant has pets which are not permitted in the property, in line with the provider's pet policy.
- An applicant is under 18 years of age and has failed to provide an appropriate guarantor or trustee
- The reference obtained from a previous landlord is not satisfactory
- Where a property has become unavailable since the advertisement was placed.

A registered provider will comply with the Equality Act 2010 and evidence their reason for refusing an applicant for a property

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Homes4Wiltshire

Proposed changes to Allocation Policy: consultation responses

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| General points | | | |
| Aster Group Lyn Dowsett | A request was made for a brief summary of what the Pause pilot programme was about in regard to 4.9.4 of the policy | Pause works with women who have experienced – or are at risk of – repeated pregnancies that result in children needing to be removed from their care. The programme gives women the chance to pause and take control over their lives, breaking a destructive cycle that causes both them and their children deep trauma, as well as costing the taxpayer hundreds of millions of pounds. JMW had previously confirmed this to all providers | Yes |
| GreenSquare Jane Gilbert | Requests made that – We include reference to the relevant parts of the Immigration Act 2014 for the Right to Rent | JMW confirmed this would be fine. | Yes |
| GreenSquare Jane Gilbert | Various suggestions made that – <ul style="list-style-type: none"> • Simpler language be used to aid understanding avoid turning laypeople off • In various places (eg 4.7.1, 4.7.2), the impact of the changes to the welfare benefit system need to be more clearly set out • In various places (eg 4.9 and 9.4.1), simplifying sentence structures to aid understanding | In some cases, suggested changes accepted, in others not (for clarity's sake eg the use of the term classes of people). 4.7.2, 4.9 and 9.4.1 to be re-drafted. JMW also drafting Accessible version for ultimate publication. | Yes |
| GreenSquare Jane Gilbert | Considers that the treatment of those who refuse two offers in a 12 month period is too harsh (4.12.1) and suggests suspending for 6 months and reviewing banding at re-admission to the register so it is possible that they can still bid but do not have the same priority | Under consideration. Could be complicated to administer if we review banding in addition to re-admitting after 6 months | |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
|--------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Banding structure overall | | | |
| GreenSquare Jane Gilbert | Importantly, given that there are so few people currently in Band 2, why not merge band 1 and 2 as this would make the administration from your perspective much easier? | Whilst we appreciate the sentiment, this would run against the concept of differentiating between emergency and urgent cases, which the revisions to Bands 1 and 2 are intended to achieve. | Pending |
| Deliberately Worsening circumstances / Sharing a home | | | |
| Aster Group Lyn Dowsett | In regard to 4.17.1 Deliberately worsening circumstances - appears to contradict 'sharing a home for mutual support? Needs some clarity? How will this be determined? | Not a contradiction as 4.5 relates to lodgers and non relatives rather than friends and 6.1 specifically to people sharing rather than the commercial relationship implied by lodgers. To be clarified in document at 4.5 and 6.1 | Pending |
| GreenSquare Jane Gilbert | Partial contradiction between 4.5 and 6.1 in relation to non related household members and who these can be | As above | Pending |
| Elwood Housing | Joint applicants who are not related or in a relationship will be able to join the list in, order to meet housing costs. This is a welcome innovation and should support our share housing pilot and of course is designed to alleviate the effects of welfare reform. | Agreed | Pending |
| Anti Social Behaviour | | | |
| GreenSquare Jane Gilbert | Suggests that 4.8.1 be expanded to include the same categories of behaviour as 4.8 In 9.5.1, need to include - Where there are existing residents with particular vulnerabilities. | Agreed Not agreed. This concept is ill-defined. However, can amend wording here. | Pending |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
|-----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| <p>Selwood Housing Kerri Hargreaves (personal)</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 59</p> | <p>12 months is not sufficient to demonstrate a change in behaviour or ability to sustain a tenancy. Most RP lettings policies rely on 24 months. Each case considered individually.</p> <p>Behaviour considered ASB should include criminal behaviour which would cause harassment, alarm or distress in a <u>residential area</u>.</p> <p>ASB and criminal behaviour should extend to any residential area the perpetrator has caused when they visited not just where they live.</p> | <p>Wiltshire Council believes that 12 months is enough time to monitor improved behaviour, to ensure a commitment to change and that support is in place to achieve that. However it is appreciated that some providers may wish to state 24 months but for someone in extreme housing need this seems a very long time.</p> <p>We have to provide evidence that the applicant has been in a breach of his or her tenancy. As a housing provider would not take action against a tenant who has caused harassment or criminal behaviour say in another town, we would also not be able to apply an exclusion as it would be subjected to a challenge.</p> <p>One of our bullets in this section includes:- any threats of and/or actual violence to people or damage to property or any activity potentially threatening the community will be considered unacceptable behaviour.</p> | <p>Pending</p> |
| Local Lettings plans & Allocations of New Build properties | | | |
| <p>Selwood Housing Kerri Hargreaves (personal)</p> | <p>Needs to make clear that Local Letting Plans may include a proportion of lettings for applicants who are economically active</p> <p>Minimum household occupancy may be applied to manage densities</p> | <p>A local lettings plan needs to be considered on an individual basis and when allocating new build we would not normally wish to advertise to those economically active as we would rather assess who is allocated as the development proceeds to ensure a balanced community is created. Those economically active may bid without the restriction being in place. This would be the same with minimum occupancy unless it is being advertised in line with the house bedroom size so 2 3 person house as second bedroom is only large enough for 1 child.</p> | <p>Pending</p> |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Selwood Housing | It appears that the council may have relaxed its strict criteria on local lettings plans on first lets for new builds, although these will need to be jointly agreed. This may help us to balance out communities better. | Agreed | Pending |
| Aster Group Lyn Dowsett | All existing customers who are applying for transfer rarely get considered for new build stock as a result of LA 100% noms rights as part of the S.106 agreements. As LA no longer contributing a great deal financially to these schemes we would like to request a similar arrangement to that in Swindon Council region and allocate 1/3 rd to Band 1, 1/3 rd transfers and 1/3 rd other applicants. | This would need to be considered outside of the Allocation Policy as this would be a revision of the nomination agreement linked to the development of new homes. Referred to Strategic Housing team | Pending |
| Greensquare Gene Gilbert | 9.5.1 Need to include. Where there are existing residents with particular vulnerabilities. | The council finds this too vague and would use a more specific working. It wishes to ensure sustainable communities and agreements can be made for limited timeframes in particular cases and will revise accordingly. | Pending |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
|-----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| <p>Selwood Housing Kerri Hargreaves (personal)</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 61</p> | <p>Band 1 Applicants should be ready to move at the point of bidding This is particularly important for applicants with complex needs and should be in the form of an up to date needs assessment and support plan and if appropriate risk assessment. This clarifies the expectation on Social Care when they are wanting their customers to be considered by RP's for independent living from care homes or hospital. Band 2 and 3 The policy needs to make it clear for the category of housing need 'medical or welfare' that a move to alternative accommodation will improve the condition and that the current housing is a significant factor in the current problem.</p> | <p>Noted and agreed. This will be requested when appropriate</p> <p>Noted and wording has been amended accordingly</p> | <p>Pending</p> |
| <p>Aster Group Lyn Dowsett</p> | <p>Could selected properties suitable for OMR bidders include Difficult to let property?</p> | <p>Yes, difficult to let properties can be advertised for those in the OMR group.</p> | <p>Yes</p> |
| <p>Melksham TC</p> | <p>Strongly agree that applicants with an urgent medical need be placed in Band 2 and those with an emergency medical need be placed in Band 1.</p> | <p>This has been agreed and will be recommended to Cabinet for approval</p> | <p>Pending</p> |
| <p>Homeless Veterans Task Group</p> | <p>BAND 2 to include Injured, sick or disabled serving or former Armed Forces personnel, in accordance with the legislation (section 166A(3) of the 1996 Act)</p> | <p>Agreed and will be recommended to Cabinet</p> | <p>Pending</p> |
| <p>Melksham TC</p> | <p>Strongly agree that injured current or former service personnel and their families who cannot meet their own housing need ought to be prioritised in Band 2.</p> | <p>As above</p> | <p>Pending</p> |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
|--------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Greensquare Jane Gilbert | Move on applicants should be considered the same way as care leavers and given the same priority. Importantly, given that there are so few people currently in Band 2, then why not merge band 1 and 2 as this would make the administration from your perspective much easier. | We have made recommendations to amend Band 2 which will increase the volume of applicant's in this band. Band 1 should be for those in the highest need for accommodation and therefore those who require move on will remain in Band 2. | Pending |
| Greensquare Jane Gilbert | In case of emergency medical or welfare need, suggests that the category Cannot be met in the current accommodation to include reference not only to a threat to life but a life changing injury or condition | Agreed | Pending |
| Melksham TC | Strongly agree that care leavers' housing applications ought to be prioritised for re-housing in Band 2. | Agreed | Pending |
| Housing Debt / Rent Arrears / Financial Resource Limit | | | |
| Selwood Housing Kerri Hargreaves (personal) | The policy should quantify what 'cleared the majority of the debt' is as a guide e.g. 70% or maintained repayment plan to be eligible to join the register. | Agreed and the recommendation to Cabinet will clarify this point | Pending |
| Selwood Housing | The policy allows people with arrears that have been accrued as a result of the spare room subsidy to register. We would prefer it if the policy was amended to say "and is contributing to their shortfall". | This has been agreed and will be recommended to Cabinet for approval | Pending |
| Selwood Housing | All those considered to have adequate financial resources will not be allowed onto the register unless they have an extra care need. This further restricts the list and the council has not yet set out what the threshold is. Please can you advise? | This is an operational rather than a policy matter because the approach is determined by housing market conditions at any given time | Yes |
| GreenSquare Jane Gilbert | Would like more information about the application of the Financial Resource Limit | As above | Yes |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
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| <p>Broad Chalke CLT</p> | <p>Item 9.4.1 of the Council's Allocation Plan i.e. "The Council or its partners may decide to let properties on a slightly different basis from normal in the interests of building strong and sustainable communities". Housing Needs Surveys in rural communities invariably reveal people living in private rented accommodation and striving to meet unaffordable rents in order to be housed locally. By 'unaffordable' we mean 'in excess of 35% of their gross income'. Occasionally, such people are deemed to have no housing need by their local Council and are therefore ineligible to apply for affordable homes, even though they meet the local connection criteria for an exception site scheme. Community Land Trusts such as Broad Chalke have encountered this issue before, notably in Christow, a village on Dartmoor in the Teignbridge District. In order to manage its Housing Register, Teignbridge had removed the lowest band, thus preventing anyone in private rented accommodation from gaining access to an affordable home. Christow CLT – supported by specialist advisers the Wessex CLT Project - worked with Teignbridge to develop a Pilot Allocations Plan whereby people in such 'economic need' for housing would be passported onto the Housing Register. We would suggest that the Council might consider three options for a Rural Pilot in Broad Chalke, being the most advanced CLT-led project in the county:</p> <ol style="list-style-type: none"> 1. A pilot approach along the lines of that developed for Christow CLT in Teignbridge, Devon. Like Wiltshire, Teignbridge had removed the lower category of its Housing Register. 2. A 50:50 approach to nominations so that, if Option 1. is not possible, at least 50% of lettings could be drawn from an independent register kept by the CLT and its | <p>The council will review its thresholds for housing need on the grounds of the proposed returns to parishes to care for (and support, if no care is required) relatives who have care or support needs. This is consistent with present practice, but will require the applicants concerned to have relatives in these parishes.</p> <p>NB Housing applicants with work in a particular parish have a connection anyway; however, if work is peripatetic, and the applicant is home based, travelling to perform work in other parishes, s/he can choose a single parish where work is performed and that will be a parish connection</p> | |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|--------------------------------|
| Under 21s | | | |
| Selwood Housing | We are pleased to see that the council will still allow this group to register but makes it clear that provider's policies may prevent them from renting a home given the changes to benefit rules. This passes the risk (although small) of a public law challenge to the provider rather than the council. Similar provisions are made for the under 35s | | |
| Local connection to a Town, Parish or Village | | | |
| Homeless Veterans Task Group Page 64 | To recommend the local connection criteria exclusion group 4.13.3 A person who has left the Armed Forces, or (Removal of the 5 year restriction) A separated or divorced spouse who is being asked to leave services family accommodation in the Wiltshire area | Amendment agreed and will be recommended for approval at Cabinet | |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
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| <p>Mike Ash, Bishopstone Parish Council</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 65</p> | <p>It seems to me that the revised policy will make it less likely that vacant homes will be allocated to anybody with a local connection and, as a result, makes it less likely that communities will be prepared to welcome affordable housing development.</p> <p>Leaving aside all the special cases, like retired service personnel etc, the main criterion remains having a local connection. However, as I understand it that is now defined at either already living in the parish (under a bush?) or working in the parish. What has been deleted is the close family connection qualification - i.e. having grand-parents, parents, adult children or brothers and sisters who live or have lived in the parish. So your family may have lived in the village for centuries but that will give you no priority. You may be a carer for elderly relatives but that will give you no priority. It seems to me that this makes it much more likely that priority will be given to people from outside the parish (because there will be fewer in it who will qualify), which, in turn will make communities far less willing to accept new affordable housing development.</p> | | |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
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| Seend Parish Council | <p>Seend Parish are unclear on the reason for the change in regard to the exclusion of close family members as a reason for obtaining a local connection and we would like clarification on why this has been proposed.</p> <p>In Seend Parish we endorse family values and the support that members of their extended family living close by can give to our residents. We feel that these family links enhance community cohesion for the benefit of the parish as well as the families concerned. In writing the neighbourhood plan we would like to include recognition of the importance of family values and family support. The removal of this criterion from the Housing Allocations Policy is of concern as these criteria, if approved, would have to be adhered to in future housing policies in Seend's Neighbourhood plan.</p> | | |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
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| <p style="text-align: center;">Page 67</p> <p>Selwood Housing</p> | <p>We are particularly concerned with the removal of the family connection criteria. This means the only way to claim local connection is if you already currently live or work in the area. This further restricts the list, prevents children from moving home or parents from moving close to their offspring. This measure may have a significant impact on the numbers on the register and is of concern.</p> <p>The measure will seriously penalise rural development. The family connection and the ability of families to return to villages is a key reason why villages are supportive of development. Without the family link the local connection to villages will become meaningless. Most families can't live in them due to the lack of existing affordable homes and villages aren't exactly sources of major employment. This proposal is at best ill thought out.</p> <p>The policy attempts to address the recruitment issues suffered by key services that can't recruit to lower paid jobs. Those with contracts or offers of jobs that are over 12 months can apply. However this may not address the problems faced by people on zero hours contracts and I understand a number of key services offer this kind of contract.</p> | | |
| <p>Melksham TC</p> | <p>Strongly disagree that applicants themselves need to have lived in the Wiltshire Council area for more than 2 years should the government change the rules, on grounds that sometimes people have a need to move.</p> <p>Strongly disagree that family connections to Wiltshire Council's area ought no longer count, on grounds that family is important to "settlement".</p> | <p>The requirement in regard to a connection to the Wiltshire Council area 2 year residency is currently in place and is not being amended or replaced. It is a statutory requirement to have the 2 year rule which the government are considering extending.</p> | |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Melksham without PC | We are concerned over the removal of the clause in point 4.13.2, the criteria that allowed a connection with the Wiltshire Council area through family, as this would prevent those attending higher education facilities from returning, especially as there is no university in Wiltshire. | | |
| Richard Kitson | I am particularly concerned that the proposed changes to the local criteria are a retrograde step and should be reconsidered. The proposed removal of the “close family” reference in Q3 will, for example, limit the opportunity for people who are forced to move away because of high housing capital or rental costs to return and in effect penalises those who seek to try to improve their circumstances albeit on a short term basis. In addition removing this criteria tends to work against the principle, that I thought the Council had endorsed, of building sustainable communities able to contribute to the rural economy, provide support and positively contribute to village life. Finally rewriting the criteria will not change the underlying need, merely hide this fact from the official figures | | |
| Cricklade Town Council | One important change that will affect residents of Cricklade was the local connection policy for relatives which allows applicants from anywhere in the country to join the Wiltshire Housing Allocations scheme if they have a close family member who has lived in the Wiltshire schemes area for 5 + years, this will be deleted. This change will be implemented alongside a requirement that a local connection is established by permanently residing in the Wiltshire Area for two years, which would replace the current requirement. | The requirement in regard to a connection to the Wiltshire Council area in regard to the 2 year residency is currently in place and is not being amended or replaced. | |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Greensquare Jane Gilbert | Include consideration for a person who grew up in the parish, town or city and was forced to move away within the past 5 years because affordable housing was not previously available in that area. This will help allocations to new housing developments in rural areas previously unable to afford accommodation in that locality. | This would be very difficult to administer and evidence this additional criteria therefore we would not be looking to implement this suggestion | |
| Mary Jarvis Broughton Gifford Parish Council | Broughton Gifford Parish Council wish to protest at the removal of the requirement to have a local family connection. This is just one of the criteria, but we feel as a Council, it is most important, especially in villages where housing is mostly out of the reach of offspring from families, due to high prices. If they lose their local right, then traditional communities in villages will disappear and with them the history and identity of a place. They will become just dormitory places to sleep for work. Some commuters clearly do not wish to be involved in village life. | | |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|--------------------------------|
| <p>Broad Chalke CLT</p> | <p>Item 9.4.1 of the Council's Allocation Plan i.e. "The Council or its partners may decide to let properties on a slightly different basis from normal in the interests of building strong and sustainable communities". Housing Needs Surveys in rural communities invariably reveal people living in private rented accommodation and striving to meet unaffordable rents in order to be housed locally. By 'unaffordable' we mean 'in excess of 35% of their gross income'. Occasionally, such people are deemed to have no housing need by their local Council and are therefore ineligible to apply for affordable homes, even though they meet the local connection criteria for an exception site scheme. Community Land Trusts such as Broad Chalke have encountered this issue before, notably in Christow, a village on Dartmoor in the Teignbridge District. In order to manage its Housing Register, Teignbridge had removed the lowest band, thus preventing anyone in private rented accommodation from gaining access to an affordable home. Christow CLT – supported by specialist advisers the Wessex CLT Project - worked with Teignbridge to develop a Pilot Allocations Plan whereby people in such 'economic need' for housing would be passported onto the Housing Register. As discussed with Janet and Helen, we would suggest that the Council might consider three options for a Rural Pilot in Broad Chalke, being the most advanced CLT-led project in the county:</p> <ol style="list-style-type: none"> 1. A pilot approach along the lines of that developed for Christow CLT in Teignbridge, Devon. <p>Like Wiltshire, Teignbridge had removed the lower category of its Housing Register.</p> <ol style="list-style-type: none"> 2. A 50:50 approach to nominations so that, if Option 1. is not possible, at least 50% of lettings could be drawn from an independent register kept by the CLT and its | | |

| Organisation & or name | Responses | Proposed Response | Response provided to consultee |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Move On | | | |
| GreenSquare Jane Gilbert | Thinks Move On applicants should be considered the same way as care leavers and given the same priority. | | |
| Appendices | | | |
| GreenSquare Jane Gilbert | Appendix 4. Provider refusals: where an applicant is under 18 years of age and has failed to provide an appropriate guarantor, this be amended to say guarantor and trustee | Agreed | |
| GreenSquare Jane Gilbert | Request to reference provider grounds from its lettings policy eg an applicant owes a debt to the housing provider, an applicant was previously evicted by the housing provider and a housing provider identifies that a household member has been involved in illegal acts or ASB within the past 2 years. | Partly agreed. Amend to include the wording "... evidence their reason for refusing an applicant for a property under its <i>adopted lettings policy</i> " | |

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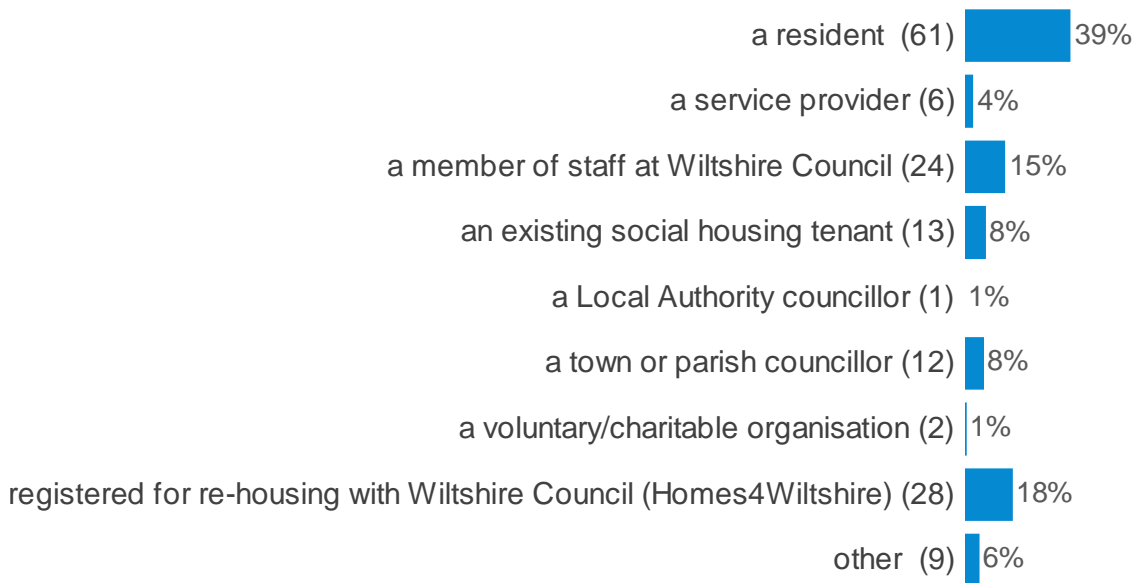
Views on new Housing Allocations Policies

Views on new Housing Allocations Policies

This report was generated on 13/03/17. Overall 157 respondents completed this questionnaire. The report has been filtered to show the responses for 'All Respondents'.

The following charts are restricted to the top 12 codes. Lists are restricted to the most recent 100 rows.

Please tick the box that best describes you. I am responding to this questionnaire as:



(If other please specify)

- _____ Wilts resident
- _____ Parish Clerk
- _____ Private rented sector
- _____ Parent carer
- _____ Clerk to Parish Council
- _____ Sofa surfing
- _____ Wiltshire resident responding on behalf of elderly relative wanting to move into the area as i'm NOK
- _____ Prospective Councillor

If you are responding on the behalf of a service provider, please give the name of the provider below: ()

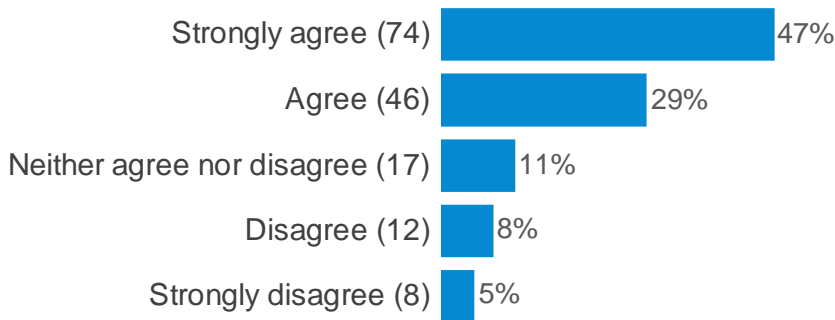
- _____ GreenSquare
- _____ Rethink
- _____ Breakthrough Trowbridge Day centre.
- _____ A2dominion Housing Group

Views on new Housing Allocations Policies

If you are responding on the behalf of an organisation, please give the name of the organisation below: ()

Alabare
Golden lane housing

Do you agree that the connection criteria requiring the applicants themselves to have lived in the Wiltshire Council area for 2 years should remain as it is unless amended by the government?



(If you disagree why is this?)

- Someone's need does not necessarily depend on where they have lived recently.
- The 'local homes for local people' feels antiquated. Take on the board the Localism Act gives powers to do this, but I don't think this needs to be applied to the nth degree.
- I think if people have had t move from an area to receive supported housing 2 years is too long to have to stay.If they are ready to move on.
- surely people who have lived in an area all their lives should have more chance of becoming a resident than someone who moved in to the area two years ago irrespective of disability or age
- May cause issues with work
- Victims of domestic violence may have fled from another area to Wiltshire.
- Under some circumstances there are times when people are forced to move out of the area that means they should be able to be housed .
- Read this several times and cannot understand thought it was 5 years not 2
- This could debar potential residents from living close to relatives who may wish to care for them, e.g., the elderly
- too vague
- Better things to spend money on
- Dependent people, such as older or disabled people often need to move to be closer to carers, and vice versa. Enabling family caring reduces the burden on WC services rather than increases them.
- If past connection to the area could be taken into account then i agree. My mother moved to Wiltshire in the 1970s and i was born in Marlborough. Over the last 42 years my mother has worked in Salisbury as a nurse, sheltered housing officer, Devizes as a nurse but this dosen't count and i'm NOK!
- If applicants' families have moved to Wiltshire within more than two year's ago then the applicants should be allowed to live near their relatives in Wiltshire.
- It should be longer 3 years

Views on new Housing Allocations Policies

(If you disagree why is this?)

It is often difficult for someone to provide the documents that are currently required to confirm local connection. There are other more important tasks for Council staff to carry out than checking and rechecking if the appropriate documents have been produced.

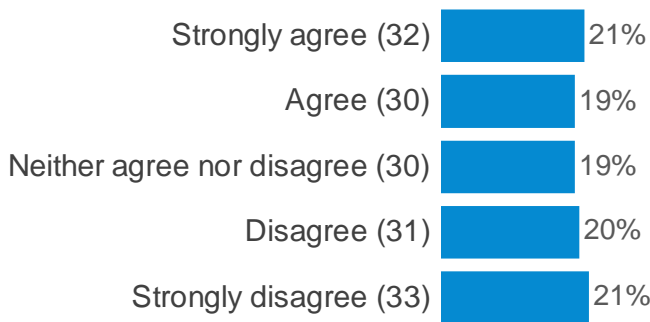
there should be a longer standing connection

The applicants may have family in the area which should be taken into account for allocation.

Wiltshire's policy states the connection must be for the past 2 years which effectively bars Offenders in prison for this period even if they have previously lived in Wilts all their lives. If there is an intention to deal with Offenders under some other provision this is not clearly stated.

It seems reasonable for people to be able to return to rejoin their families.

Do you agree that we should remove the following connection criteria – applicants who have close family (grand-parents, parents, legal guardian, adult children or brothers and sisters) who have continuously lived in the Council's area for 5 years or longer? NB Please note that this does not affect those who need to move to or within Wiltshire Council’s area to give or receive support which cannot be provided by other means.



(If you disagree why is this?)

it will limit down options for applicants homeless.

Wilts need to be more efficient. To recruit additional staff to adminster this policy would be a waste of tax payers money. There needs to be some flexibility within this policy and this is an ideal place to do this.

If someone has been born and bred in the area then they should always be put before others who have moved into an area in their adults years , again irrespective of disability or age

I need to be in Wilton with my family as I have mental health problems how would I get to where I need if I don't have any connection

Family support is valuable in some family members well being.

This can devide family's and cause lots of upset and distrssinhb

Keeping families together means applicants with children would have access to childcare so they could work

people need to live near their family conne ctions for well being and also for family support

Someone may have had to move out of the area for work, then want to return.

Family matters and if care of the elderly is important then close family units are important

provision of family care

Parents that need to be closed to there Adult Children need this Local Connection.

Views on new Housing Allocations Policies

(If you disagree why is this?)

Because we feel it is vital that close family stay near to support older family members and may not have suitable resources to live independently.

Whould there be any merit in terms of staff rescourses to reduce the time period?

Same reasons as above

The local connection allows committees to grow and thrive

Because people need to access private renting if they wish to move to an area as the first option people who do want to stay local to family have their chances reduced if anyone can move to area . This is especially important in rural areas

Family connections and close proximity are the backbone of the english way of life,to put somebody in an area where they do not know anyone is potentially terrifying

Familiar support networks are essential for physical/emotional wellbeing including mental health and may, for example, offer support for those wanting to get back to work, particularly for single parents. Close family connections should be encouraged and may help reduce costs to other services?

To help families local to area

Do we live in the 21st century with the same mind set as the 19th century with a poor law ??

There has to be a criteria. It was the one that allowed me to come back to the area and support and care for my Mum. the competetion for housing was tougn enough 7 years ago. Remocing ti would just open it up to anyone and be more open to fraud.

For rural areas it is very important that young adults can live near their families and are not pushed out of communities due to a lack of housing.

i thank the connection criteria should remain so that local families have the oppportunity of living in sustainable communities that extended family will give them. I

it is reasonable

Families need to be near

Should keep family links going, family can give support when needed

see above

Houses for local people

I think that sometimes you may nerd help from close family

Priority should be given to those who have connections with the area over people who have none at all or who have never lived locally

You need a benchmark.

this is no distinction for criteria in your policy for general housing and older people's requirements so by keeping this in you exclude my mother from moving nearer to me as NOK because we have moved back to the area and under 5 years so you need to rethink this

family nearby can help with additional support

Drop the residence criteria from 5 years to 2 years.

So local people can stay near family and lively hood

In rural areas priority must be given to those with a local connection

This is y I want to live here

Priority should be given to housing local people.

Applicants who have strong family ties in Wiltshire should have priority consideration

It is a support network.

It is the individual person who wishes to live in Wiltshire. Where his family lives should not be relevant.

Views on new Housing Allocations Policies

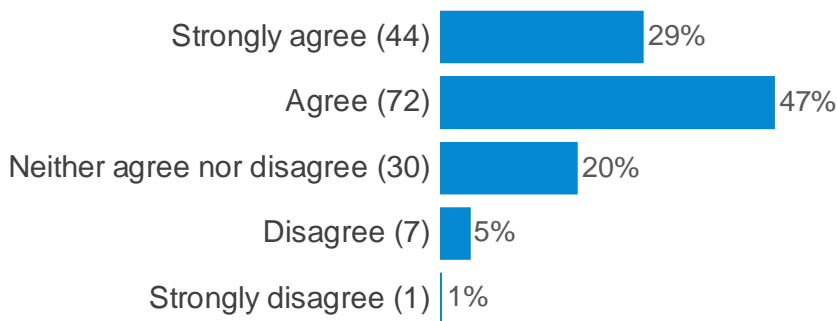
(If you disagree why is this?)

Familial connection creates community, allows family support and recognises the importance of belonging to a locality.

This is the single most important criteria for connection. Applicants can simply be asked to specify which family member has been resident and in the vast majority of cases, this can be verified through electoral roll or other easy research.

Family members should be supported to be able to live closer to each other

Do you agree that due to the Council’s corporate parenting responsibility towards care leavers we should include additional criteria in Band 1, to ensure that they are provided with additional priority for re- housing?



(If you disagree why is this?)

We should work with people in care to support them into independent living- our aspirations for our young people should be more than getting them on the Housing list.

not sure what you mean--extra points for ex-military personnel or for those providing care for them

The system is not currently fair

I think this could be included under the social care criteria in band 2

Do not understand the question

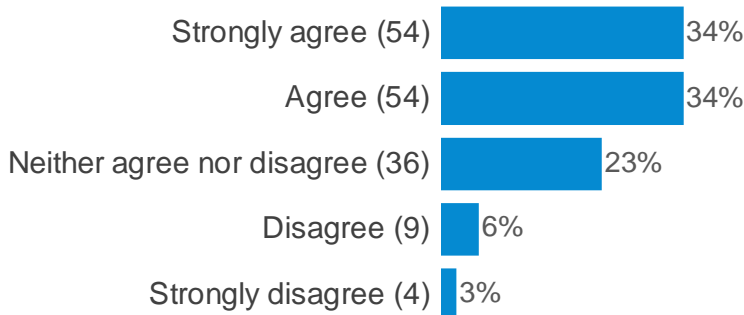
Those eligible should be treated the same

They should be looked at individually and given the same priority as someone needing to move out of their parental home.

because those that are in serverley over crowded properties get passed over for better accommodation.

Views on new Housing Allocations Policies

Do you agree that we should include additional criteria for injured current or former service personnel and their families who cannot meet their own housing need in Band 2 to reinforce our commitment to the Armed Forces?



(If you disagree why is this?)

All people with disabilities should be able to access the support they need. I don't think priorities based on how people become disabled are fair.

The MOD should look after its personnel who have served their country and the housing should be better than that which the local authority provides

Army houses are being built faster than social housing

For service that has been cut short due to serious/life changing injury, potentially? However it should be down to the MOD to provide or highly subsidise their housing needs.

With the numbers of military personnel moving into Wiltshire as part of army rebasing, I am concerned that their needs would be prioritised over those with a stronger local connection.

I believe that the forces should do their best to provide their ex military housing

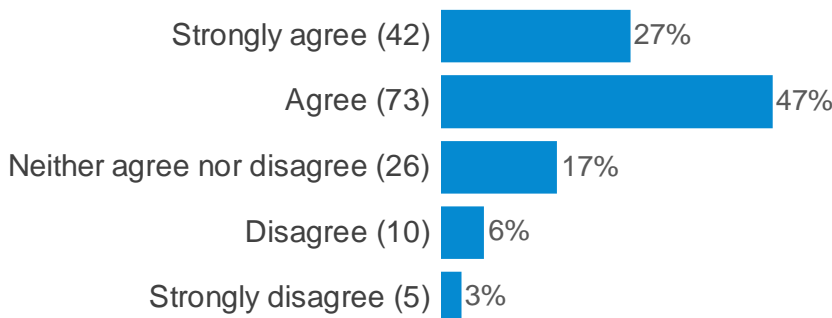
Central Government should provide housing for former service personnel.

I feel the military should bear this burden not local residents

The government and local govt should be investing in affordable rented accommodation to meet demand

Injured yes. Former no. Having left the forces they should be treated like any other person. If they have a genuine homeless need, they would already be a priority.

Do you agree that applicants with an urgent medical need to move should be awarded Band 2 status and those whose medical need is an emergency remain in Band 1?



Views on new Housing Allocations Policies

(If you disagree why is this?)

This is creating more layers and more grey areas.

Depending on how or who decides between urgent and emergency

I think if you have a medical need you should all be treated the same maybe in there own banding

Banding should relate to individuals needs. Talking to them might be the way to find out their needs

Some people are moving to Wiltshire to get NHS medical care that other CCGs do not fund.

unclear again-please show link to bands and their criteria and explain more precisely what medical c

It should remain as Band 1

emergency and urgent medical needs should both be Band 1 priority

How do you determine whether someones medical need is urgent or emergency.....its relative?

Any urgent medical need should be band 1 it's urgent for a reason!

if this is introduced, we must have very clear guidelines for all medical bandings, due to appeals

However, this is related to your own interpretatio, as my daughter has a medical need to be rehoused

GPs should be given an option to request help for those with emergency medical need.

Urgent cases can be as important as emergency therefore should have as high priority

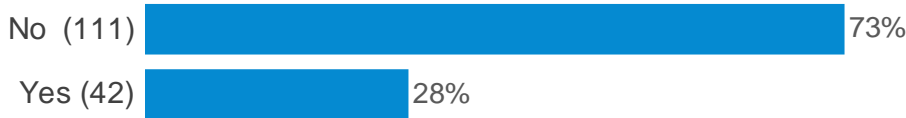
There should be no need, the housing stock should be there

Without knowing the real difference it makes no difference.

Insufficient space to explain reasons.

How is it judged as to what is an emergency & what is not? Who makes the judgement?

Are there any other groups that are not already covered in the Policy that should be awarded additional preference? ()



If you said yes which groups?

Greater priority for the working poor, who aren't really catered for in this policy.

Special needs

The rules for persons who suffer anxiety, agrophobia with long term Dr's evidence and types of medication and how long on them, someone trying to use this to que jump the against genuine ppl who have been on Medstead and under Dr's for years

Those who are assessed as being in accommodation that is unaffordable to them, should have the option to go on the Housing Register under Hardship band 3

Mentally ill who need support from family and the community

Better help for people with mental health

The elderly should be treated with care and respect.

If the bread winner of a family with a wife and two children works in a village is born in a village and his or her children go to school in that same village but the family has insufficient income or capital to buy a house then they should automatically qualify for the first available council house

Victims of domestic violence

Views on new Housing Allocations Policies

If you said yes which groups?

people who have maintained property and not defaulted at all on rents should be given priority, also the right to view a property when downsizing without being penalised if they do not accept the offer as often the new property will not accomodate hard earned fittings.

Older people with health issues ie, people well into their 60's who will no longer be able to afford private rental as their work needs to be cut down ie lower wages

Learning disability groups. They are happy to share generally so doesnt take up seperate property

People who have a housing need. Full stop given more help with the costs of moving is removals and a cash deposit generally be helped more

Local families

Parents of children with additional needs and families with multiple areas of concern

Diabetic teenagers

Families Young children living above 1st floor

Medical disabilities, for safety for a child's' welfare

Learning disability/autism

Those who are slightly disabled due to previous physical injury and who have local connections but have to live at home because there is no housing.

Moving for school or work

People who live in mouldy flats which greensqaure has admitted. It is rising damp.

Current residents who live in properties that are no longer suitable for their medical needs, e.g., mobility or downstairs bathroom & bedroom

Those who are getting illnesses due to age and jobs who still have to work but find it diffecult to live in thier present homes

families that are classed as homeless with a home should not be seen as not in need ie adults and 2 or more children sharing 1 bedroom are currently placed in band 4 with people who have 1 child but they have a higher need.

Domestic abuse victims and prison leavers and additional vulnerable needs such as mental health

Mental health

Young working people who can contribute to the local economy

Carers moving into houses with people who need care should have priority

Single mothers. (Myself) who are already in accommodation yet the rent exceeds the housing benefit. I know 4 people in Wiltshire. My parents and my sister and husband. Yet I'm at the bottom group for affordable housing and I'm being forced to bid on properties 40+ miles away. I feel isolated.

Working Homeless professionals

your policy does not include in their own right older people for retirement housing, you include them in the general housing criteria which i think is wrong as they have their own needs

Unless covered elsewhere, people with learning difficulties etc.

medical and emergency staff who have worked in Wiltshire for a period of five years or more

I need reminding of the groups that are included.

Single adults living in supported housing who need to move on before 2 years when their funding for supported housing will end. When able to move on in the hope being able to maintain an independent tenancy, the shortage of available housing is very distressing for them.

the over crowded family's should be put into separate category i.e crowded and severely crowded, family's with teenagers and younger siblings of opposite sex share the same room,

members of the armed forces who make the application more than five years after discharge

Low income families with no chance of affording a larger private rented property

Views on new Housing Allocations Policies

Do you have any other comments to make about the revised Allocations Policy?**If you said yes what would you like to comment on?**

lettings of bungalow that are genral need properties need to age limited. Rent arrear payment plans need to be proportionate. If someone has been evicted with high level arrears £1500 plus paying 6 month worth of minimal payment is not sufficient, it should be half the debt before they are entitled

Local Cllrs need to look outside of Wiltshire. This is too inward focussed - lose some of the local connection rigidness which may be preventing new homes from being built. Think about the longer term and future generations.

The only people who should be prioritised on allocations listing should be Ex Armed Forces wounded or not / Elderley with more than a single connetion to the area / Disabled with more than a single connection to the area / and Young Adults leaving the Care System /

It is good to see that the LC criteria has not been increased to 4 years as this will have a detrimental impact on Housing Options and homelessness.

Local families who have lived in a town,village etc over 100 years should always take priority.

I feel that it may be worth considering affording Band 1 Priority where there would be additional financila costs to the council in terms of expenditure on care provision or adaptatons to their home should they remain where they currently reside.

I have been in band 3 for almost a year I get to number 2 most weeks in the area I need but I never get an offer this I think is unfair that if you get this close to the top more than once or twice you should've been next in line instead of others coming before .

I think the band for over crowding should be moved up as this is a very hard situation to be in especially in my case where I have 3 children sharing not a big room ages 2 6 15 this has a big impact on my daughters learning

yes should b e encouraged to remain close to support and give general well being and pensioners cannot afford to maintain a car to trvel to meet up with their family.

you need to explain everything more clearly and precisely when conducting a survey. This is too wordy and loses meaning/significance.

Employ more staff. Cut the salaries of the Heads of Service.

if reviewing a need to move consider all paperworks given in, ours was dismissed tho asked for by a Wiltshire council worker, due to gemma's back we do need to get out of the 2nd floor flat and be moved to westbury where we can get family support with our daughter.

re OMR-seems to be same as old Bronze banding, each appl should be looked at to see if they can afford OMR or apply for hard to let etc - no point in them being on OMR if no income

I want you to read use on the bedroom use

Why is it that my sister is in a 2 bedroom property with 3 children one Who is 14 and suffers with type 1 diabetic and need her own space has been told she will never get moved. The whole housing system is a joke

if there are areas in england and Wales who are looking for affordable homes and who are not working May they be allowed to be rehomed in other counties other than their original county

You have mentioned banding 1 and 2 for medical reasons, however you do not adhere to this, as my daughter is in very need of your definition and you still put her in Banding 3, as you preseve her needs to not be of great concern and everyday 24/7 we have to keep an adult with her for fear of injury.

Views on new Housing Allocations Policies

If you said yes what would you like to comment on?

Adults with learning disability and autism have had their needs ignored and the needs of families supporting them. Vulnerable but ignored group.

There needs to be a robust allocation system. So much could be done to release homes by taking a robust system. Also needs under usage, absent tenants, anti social behaviour that continually breaks their tenancy. Leading to health issues and more requests for a move

I don't see why houses people are not considered. They will be freeing up a property so should be able to be listed and await moving

Greensquare should look into its current tenets and get them out of mouldy flats residents should NOT have to live in the extremely mouldy flats in dogridge. I am with greensquare and have lived in this extremely mouldy flat for nearly 5 years you should be moving us out to sort the rising damp.

As someone who has given up their own home to care for their elderly parent people like me should be better taken into consideration on housing when that parent dies

It says that siblings of different sex between 10 and 15 years only need 1 bedroom? How can you expect a 15 year old boy to share with his 13 year old sister. I find that very very unfair.

The policy needs simplifying, it is far too complicated to see where you stand with the policy, being a member of the public needing to use the service

I understand that EU policy dictates many of the 'group' included, this will presumably change following Brexit if you wish. I feel that the policy to give local people precedence is essential.

People with mental health needs often do not appear as an emergency however their chronic conditions often warrant priority banding

Consider the fact some people at the bottom of the pile have feelings. I'm bidding on places I wouldn't want to live by choice miles away from anyone I know, I'm bidding because I'm desperate and not one property has appeared close to my town. Yet 100 of houses are being built.

Single working men need priority as well

i just think that you should take into consideration with regard to the elderly a different criteria for them wanting to retire back to the area especially if people have had a previous connection and if their next of kin lives already in the area. It is wrong to include them under general housing.

Why are you housing young families and single men with full time employment in bungalows built for the elderly.

Quite clearly, additional staff are required in the North area where the highest number of social housing tenants wish and need to live. It would also seem that staff without Officer expertise are the main point of contact.

With the cessation of Housing Benefit for young people it is likely to result in more homeless young people living on the streets. There needs to be recognition of this and plans made at county level to cope with that scenario.

I think that many residents are not aware of the proposal to remove familial links from the policy. This was highlighted as a significant part of the policy when it was first introduced. I think the proposed change should be much more widely publicised and consulted on.

Disable Families (Adult & Children) with medical problems should be awarded band 2 not band 3. I was awarded band 3 which is unfair because I am mentally & physically disabled and my two children are also disabled. Also I am getting harassed in my area. Also I am suffering from lung cancer.

It's a good document overall

Please re-evaluate the maximum occupancy policy i.e. Two children with a 4 year or over age gap regardless of gender a child should NOT be classed as "half " a person

Wiltshire Council

Cabinet

10 October 2017

Subject: Wiltshire Local Plan Review - Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 Consultation on the Scope of the Plan

Cabinet Member: Councillor Toby Sturgis - Spatial Planning, Development Management and Property

Key Decision: Yes

Executive Summary

Cabinet at its meeting on 12 September 2017 approved the Wiltshire Local Development Scheme 2017 (LDS). Included in the updated LDS is a timetable for the review of the Wiltshire Core Strategy, covering the plan period 2016 to 2036, to be recast as the Wiltshire Local Plan. It was recognised in the report that one of the next steps would be to consider further, in collaboration with Swindon Borough Council, the scope and content of the proposed Wiltshire Local Plan Review Regulation 18 consultation programmed for the autumn 2017 and the approach to the Joint Spatial Framework. The scope of the Plan is set out in the LDS.

At the meeting in reaffirming the Council's commitment to joint working with Swindon it was recognised that given the Council's responsibilities to support the interest of Wiltshire's communities that Cabinet would need to be satisfied that appropriate plans are in place to maintain deliverable five year housing land supply in both areas before approving plans. This will become relevant in later stages of plan making when policy proposals start to emerge.

This report sets out the proposed content for the initial consultation on the Wiltshire Local Plan Review and consultation arrangements. This includes two documents. Firstly, an issues paper inviting views on the methodology, scope and objectives for the Joint Spatial Framework and its relationship with the Local Plan reviews; as well as strategic issues to be considered in preparing the Joint Spatial Framework. Secondly, a position statement to inform the Wiltshire Local Plan Review, which carries forward the work undertaken on the previously proposed partial review of the core strategy which focused on assessing the need for further development management policies through a review of the remaining saved district local plan policies and national policy.

Maintaining an up-to-date development plan in accordance with the National Planning Policy Framework, in cooperation with Swindon Borough Council, will support plan led growth across the county safeguarding the authority from speculative and unplanned development which does not support sustainable

and resilient communities. The consultation will involve Wiltshire's community and other stakeholders in the early stages of plan making.

Proposals

That Cabinet:

- (i) Approves the documents set out at Appendices 1 and 2 for the purposes of consultation on the scope and content of the Wiltshire Local Plan Review, subject to amendment in (ii);**
- (ii) Authorises the Associate Director for Economic Development and Planning in consultation with the Cabinet Member for Spatial Planning, Development Management and Property to: make any necessary changes to the consultation documents before they are finalised for publication and agree any changes to Appendix 1 with Swindon Borough Council; and make arrangements for, and undertake statutory consultation for a 6 week period starting during the week commencing 6 November 2017 concurrently with Swindon Borough Council.**

Reason for Proposals

To ensure that progress continues to be made on maintaining an up-to-date development plan for Wiltshire in line with the Council's Local development Scheme and statutory requirements.

Alistair Cunningham, Corporate Director

Wiltshire Council

Cabinet

10 October 2017

Subject: Wiltshire Local Plan Review - Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 Consultation on the Scope of the Plan

Cabinet Member: Councillor Toby Sturgis - Spatial Planning, Development Management and Property

Key Decision: Yes

Purpose of Report

1. To seek approval for the initial consultation on the Wiltshire Local Plan Review and the development of the non-statutory Joint Spatial Framework being prepared jointly with Swindon Borough Council in accordance with the Wiltshire Local Development Scheme 2017 and legislation.

Relevance to the Council's Business Plan

2. The Business Plan 2017-2027 'Forward Thinking' seeks to create strong communities in Wiltshire. One of the four priorities, 'Growing the Economy', recognises the importance of job creation and improving housing supply to enable people to live and work locally. Delivering development where it is needed forms one of the Goals of the Business Plan. The timely review of the Wiltshire Local Plan to ensure planning policies on the release of land for development to support sustainable growth and resilient communities contributes to this Goal.

Background

3. Cabinet at its meeting on 12 September 2017 approved revisions to the Wiltshire Local Development Scheme. Included in the updated LDS is a timetable for the review of the Wiltshire Core Strategy over the plan period 2016 to 2036 to be recast as the Wiltshire Local Plan. It was recognised in the report that one of the next steps would be to consider further, in collaboration with Swindon Borough Council, the scope and content of the proposed Wiltshire Local Plan Regulation 18 consultation programmed for the autumn 2017.
4. The Wiltshire Core Strategy was adopted in January 2015 and provides a positive and flexible overarching planning policy framework to guide development across the period to 2026. It is required to be consistent with

national planning policy contained in the National Planning Policy Framework and the supporting Planning Practice Guidance.

5. Advice in the NPPF states that local plans should be “*drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date*” (paragraph 157). The adopted Wiltshire Core Strategy has a time horizon of 2026 which is 9 years hence, less than the preference expressed in the NPPF. It is, therefore appropriate to begin a review of the plan as identified in the 2017 LDS.
6. Historically, the Local Development Scheme envisaged a partial review of the Wiltshire Core Strategy. The purpose of that review was to assess the need for further detailed development management policies to ensure consistency of approach across the county and in effect remove the remaining saved district local plan policies. It would also allow for any gaps in policy to be addressed in order to improve conformity with national planning policy. There was a particular commitment to update retail and town centre policies. Consultation on the scope of that plan and evidence to inform the partial review of policies was undertaken April to May 2015. In line with the 2017 Local Development Scheme, this work should be absorbed into the review and roll forward the development policies to 2036.
7. The proposed scope for the Wiltshire Local Plan Review included in the LDS 2017 was reported to Cabinet on 12 September and combined the intentions of the former Wiltshire Core Strategy partial review and Gypsy and Traveller Development Plan Document.
8. The LDS 2017 also included the development of a non-statutory Joint Spatial Framework with Swindon Borough Council to give strategic direction to the broad scale and location of development and supporting infrastructure across Wiltshire and Swindon informed by a shared evidence base. The current evidence base to inform that work includes the Strategic Housing Market Assessment (SHMA) and Functional Economic Market Area Assessment (FEMAA) as reported to Cabinet on 12 September 2017. The Joint Spatial Framework will provide the strategic context and evidence to inform the individual local plans prepared by Wiltshire and Swindon.
9. At Cabinet on 12 September, in reaffirming the Council’s commitment to joint working with Swindon it was also resolved that given the Council’s responsibilities to support the interest of Wiltshire’s communities that Cabinet would need to be satisfied that appropriate plans are in place to maintain deliverable five year housing land supply in both areas before approving plans.

Main Considerations for the Council

10. To ensure plans are prepared on a sound footing, local planning authorities are obliged to undertake consultation at the start of the process. This is a requirement under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

11. In the Regulation 18 consultation the authorities are required to state the subject of the plan that is proposed to be prepared and invite representations about what a local plan with that subject ought to contain. The consultation must be for a minimum of 6 weeks. It is an opportunity to seek comments on what the review should cover and any other matters that would help the authority develop their plan.
12. As set out in the September Cabinet paper on the update to the LDS, the Regulation 18 consultation is also an opportunity to start to engage with the community and other interested parties on the development of the Joint Spatial Framework. As a consequence the Regulation 18 consultation on the Wiltshire Local Plan Review should run concurrently with that for the Swindon Local Plan Review. A similar paper is being considered by Swindon Borough Council's Cabinet on 18 October 2017.
13. As well as seeking comments on the proposed scope of the plan, the consultation should therefore also include:
 - (i) A discussion document on the strategic issues facing the combined area of Swindon and Wiltshire, as set out in **Appendix 1** (The Swindon and Wiltshire Joint Spatial Framework: Issues Paper) and summarised below;
 - (ii) A position statement in relation to the Wiltshire Local Plan Review, which includes information relating to the previously proposed partial review of the core strategy, as set out in **Appendix 2** and summarised below;
 - (iii) Awareness raising in relation to a call for sites; and
 - (iv) Wiltshire Local Plan Review Sustainability Scoping Report.

The Swindon and Wiltshire Joint Spatial Framework Issues Paper

14. This is a joint paper with Swindon Borough Council to invite comments on:
 - (i) The proposed methodology, scope and objectives of the Joint Spatial Framework and its relationship with the Local Plan reviews; and
 - (iii) Strategic issues in the proposed housing market areas, as well as Swindon, Chippenham, Salisbury, Trowbridge and Wiltshire's market towns (as defined in the Wiltshire Core Strategy).
15. The main findings of the Swindon and Wiltshire Housing Market Assessment (SHMA) and the Swindon and Wiltshire Functional Economic Area Assessment (FEMAA) have informed the Issues Paper. The paper also draws on published information such as the census, the Swindon Local Plan and Wiltshire Core Strategy and other relevant policy documents.

16. The purpose of the Joint Issues Paper is to explain the nature of joint working through the preparation of the Joint Spatial Framework clearly and transparently and to invite views early in the plan preparation process on relevant strategic issues that may influence plan making. The document contains a number of questions designed to so this.

Wiltshire Local Plan Policy Review Position Statement

17. In the spring of 2015 Wiltshire Council consulted on the scope of the then proposed Wiltshire Core Strategy Partial Review. The partial review was focused on assessing the need for further development management policies to ensure consistency of approach across the county. The intention was to in effect, remove the remaining saved district local plan policies. The partial review also included an analysis of potential gaps in policy to improve conformity with national planning policy, for example, an update of saved retail and town centre policies. The consultation was supported by:
- (i) A gap assessment of saved policies, March 2015;
 - (ii) A gap assessment on compliance with national policy, March 2015;
 - (iii) Wiltshire Core Strategy Retail Review, February 2015; and
 - (iv) Wiltshire Open Spaces Study, March 2015.

18. The Wiltshire Local Plan Policy Review Position Paper (**Appendix 2**) recaps on what happened as part of the earlier consultation and identifies the main outcomes of that consultation to give an indication of the policy areas which need to be considered as part of the current review. The consultation should provide the opportunity for additional comments to be made, given the time that has lapsed since they were first consulted on.

Call for Sites

19. Landowners and promoters of land for development have the opportunity at any time to put forward land for consideration in plan making. Opportunities are assessed through the strategic housing and employment land availability assessment, which is periodically published.
20. The Wiltshire Strategic Housing and Employment Land Availability Assessment 2017 will be published on the Council's website to coincide with the proposed consultation and will inform the assessment of strategy options included within the Joint Spatial Framework. However, it is possible that additional sites may come forward through the plan making process and these will need to be considered early on in the process, as such a call for site should also be undertaken to raise awareness of the opportunity to submit further sites.

Wiltshire Local Plan Review Sustainability Appraisal Scoping Report

21. Current legislation requires that all Development Plan Documents (i.e. Local Plans) are subject to a Sustainability Appraisal and a report on the findings of the Sustainability Appraisal must be published alongside the

plan. The Sustainability Appraisal performs a key role in providing a sound evidence base; it assesses the social, economic and environmental effects of plans, including reasonable alternatives, and ensures that sustainable development is treated in an integrated way in the plan preparation process.

22. The Wiltshire Local Plan Review will be subject to sustainability appraisal. Work is on-going to align the assessment criteria in relation to the Wiltshire Local Plan and Swindon Borough Local Plan to ensure consistency of approach across the combined plan area. It is proposed to consult on the Wiltshire Sustainability Appraisal Scoping Report alongside the Regulation 18 consultation.

Consultation Arrangements

23. Subject to Cabinet approval, preparations will be made to finalise and publish the consultation material to support the consultation for a period of six weeks in accordance with the Council's Statement of Community Involvement and statutory requirements. The consultation will start as soon as possible during the week commencing 6 November 2017 which will ensure the consultation period closes before the Christmas break. As part of the consultation process the following arrangements will be put in place (with similar arrangements made by Swindon Borough Council in relation to their area):
- (i) Early notification of the consultation period to Parish and Town Councils following Cabinet approval;
 - (ii) Letter or email to consultees on the spatial planning consultation database, providing notification of the consultation;
 - (iii) Online publication of all consultation documents on the Council's website including consultation portal;
 - (iv) Publication of advertisement in local newspapers to cover Wiltshire;
 - (v) An item about the consultation in the Parish/Town Council Newsletter;
 - (vi) Publication of a press release on 'Our Community Matters' websites;
 - (vii) Notification of the consultation to be distributed through Community Area Board networks and via Chairman's announcements at Board meetings leading up to and during the consultation period as necessary;
 - (viii) Documents being made available for viewing at the Council's main office hubs (Chippenham, Devizes, Salisbury and Trowbridge) and at Wiltshire Council libraries; and

- (ix) Creation of a joint web page (hosted on the Wiltshire Council website) to provide information on joint working and the Joint Spatial Framework, and links to the appropriate pages of each authority's local plan review website. Any material relating to joint working will be approved by the Cabinet Member for Spatial Planning, Development Management and Property and Swindon Borough Council's Cabinet Member for Strategic Planning and Sustainability.
24. It is also proposed to hold specific events for representatives of parish and town councils, as representatives of their communities, on the new HMA basis. This could be extended to Steering Groups involved in neighbourhood planning as well as Wiltshire Councillors. These would be in the form of an evening meetings for invited participants (starting at 6.30pm), in particular, to explain:
- (i) the conclusions of the SHMA and FEMAA;
 - (ii) the purpose of the consultation on the scope and content of the plan(s);
 - (iii) the approach to joint working with Swindon Borough Council and role of the Joint Spatial Framework; and
 - (iv) relationship with neighbourhood planning.
25. It is proposed that four events are held in Wiltshire, one in Chippenham (Chippenham HMA), Salisbury (Salisbury HMA), Royal Wootton Bassett (Swindon HMA) and Trowbridge (Trowbridge HMA). A fifth event would also be held within Swindon Borough led by their Council officers. The timings and details should be agreed with Swindon Borough Council to ensure a coordinated approach to the events. It will be important for Officers from each authority to be able to attend both events relating to the Swindon HMA. It is also proposed that a developers forum is held during the consultation period.

Next Steps

26. Once the consultation has closed all responses will be considered in order to determine whether any changes to the proposed scope of the Wiltshire Local Plan Review are required. Furthermore, the responses to the questions embedded in the Joint Issues Paper will be assessed to inform the preparation of both the Joint Spatial Framework and each authority's local plan review.
27. The outcome of the consultation following consideration of responses will be reported back to Cabinet as part of the material to support the proposed consultation on a draft Joint Spatial Framework and draft options for the Wiltshire Local Plan Review. The Local Development Scheme anticipates that this will be in the summer 2018 and winter 2018/19 respectively. Following these consultations the Local Development Scheme anticipates pre-submission consultation on the draft

Overview and Scrutiny Engagement

28. There has been no overview and scrutiny engagement at this stage.
29. The proposed approach to joint working and the proposed scope of the Regulation 18 consultations has been discussed with members within the Swindon and Wiltshire Joint Working Group, a forum for informal discussion established to facilitate joint working.

Safeguarding Implications

30. There are no safeguarding implications arising from the proposal

Public Health Implications

31. Planning for sustainable development to meet the employment, housing and infrastructure needs of communities helps foster their wellbeing. Well planned development, including appropriate infrastructure, supports health and well-being of local communities, for example through the provision of green infrastructure and infrastructure to encourage walking and cycling as means of travel. Maintaining up-to-date policy for Wiltshire supports the timely delivery of social infrastructure to improve the resilience of our communities.

Procurement Implications

32. The Regulation 18 consultation is the first step in the plan making process and, of itself, has no direct procurement implications. However, the development of the Swindon and Wiltshire Joint Spatial Framework and Wiltshire Local Plan Review will have procurement implications in order to gather appropriate evidence to support the plan making process. For example, officers have procured further information on the provision of employment land across the county in the form of a Wiltshire Employment Land and Workspace Strategy. Where such procurement implications do arise these requirements will be undertaken in accordance with Council Procurement and Contracting Regulations, and in consultation with the Strategic Procurement Hub.

Equalities Impact of the Proposal

33. The purpose of maintaining up to date planning policies in Wiltshire is to make sure growth and development in the County is positively managed.

The public consultation processes and community involvement embedded in plan preparation in accordance with the Wiltshire Statement of Community Involvement ensures that everyone has an opportunity to inform the review of the local plan.

34. In line with Regulations, when plans are submitted to the Secretary of State for examination they must be accompanied by an Equality Impact Assessment.

Environmental and Climate Change Considerations

35. The Wiltshire Local Plan relates to the development and use of land and will have implications for the physical, economic and social environment of Wiltshire. Sustainability Appraisal, incorporating Strategic Environmental Assessment and Habitats Regulations Assessment, will be undertaken as part of both the local plan review and the Swindon and Wiltshire Joint Spatial Framework to ensure that negative environmental impacts are avoided, and policies and proposals deliver development in a sustainable manner (see the Programme of Work attached as an appendix to the Swindon and Wiltshire Joint Spatial Framework Issues Paper, at **Appendix 1.**)
36. The process of plan making incorporating Sustainability Appraisal will take into consideration both the current position and predicted future considerations in relation to the local environment, for example, in relation to climate change and flood risk and in relation to future traffic growth.

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

37. It is important that Wiltshire continues to maintain up-to-date policy to ensure that plan-led growth, that best meets the needs of Wiltshire, can be delivered. Failing to do so would increase the risk that growth would occur piecemeal, delivered by developers rather than as planned. The government's housing White Paper 'Fixing the broken housing market' (February 2017) and more recently published 'Planning for the right homes in the right places: consultation proposals' by Department for Communities and Local Government (DCLG) on 14 September 2017 set out the clear expectation that plans should be reviewed every 5 years.
38. The National Planning Policy Framework sets out the 'presumption in favour of sustainable development' and states that where plans are out of date, silent or indeterminate, then permission should be granted. In addition, it requires a five year land supply to be maintained and sufficient housing land to be identified. Beginning work now on the review and roll forward of housing and employment requirements in Wiltshire to 2036 should ensure the supply of housing is maintained beyond 2026, reducing the risk of non-plan led development in the longer term. Proposals for the Councils' respective Local Plan housing requirements and how housing land supply can be maintained to deliver these will need to be considered at later stages of the plan making progress.

39. The former district Local Plans were only originally intended to be in place until 2011 but many policies have in effect been rolled forward until they are replaced by consistent policy across Wiltshire. The Wiltshire Local Plan Review will complete the review of all saved policies and ensure consistency of planning policy across Wiltshire. The review will also enable local plan policies to be reviewed in the light of more recent government guidance removing the risk of inconsistency and confusion.

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

40. The draft Wiltshire Housing Site Allocations Plan has recently been published for consultation. It includes housing proposals to deliver the housing requirements established through the adopted Wiltshire Core Strategy. Identifying new land for development is always controversial and there has been considerable reaction to the publication of this document.
41. The proposed Regulation 18 consultation is the first step towards reviewing and rolling forward the Wiltshire Core Strategy housing and employment land requirements to 2036. The risks associated with the recent publication of the draft Wiltshire Housing Site Allocations Plan closely followed by the Regulation 18 consultation for the Wiltshire Local Plan Review include:
- (i) Public concerns about the amount of additional land for development needed in addition to that included in the draft Wiltshire Housing Site Allocations Plan and its impact on local communities; and
 - (ii) Confusion over the role and function of the two separate documents (Joint Spatial Framework and Wiltshire Local Plan Review) and the respective programmes of consultation which may lead to reputational risks to the Council from members of the public who are concerned about the approach to planning in the county.
42. These risks will be managed through clear and timely communications both within and outside the organisation to explain the process of plan making. This will include the specific events for representatives of town and parish councils proposed as part of the consultation process.
43. In addition, following the publication of the Swindon and Wiltshire Strategic Housing Market Area Assessment and Swindon and Wiltshire Functional Economic Area Assessment developers may seek to suggest that the evidence should be used in decision making to justify their proposals. This risk is being managed through publishing information about the status of the two documents as part of the Wiltshire Local Plan Review to help embed the document into the plan making process. It will need to be made clear that the assessments will remain under review in the light of the government's proposed reforms to the planning system.

Housing White Paper and review of National Planning Policy Framework

44. The proposed consultation and programme for the Wiltshire Local Plan Review is being prepared in accordance with current legislation and national policy. In February 2017 the government published its housing White Paper 'Fixing our broken housing market'. The White Paper announced the government's intention to consult on a new standard methodology for calculating objectively assessed housing need and proposals to improve how authorities work together to meet housing and other requirements across boundaries. The 'Planning for the right homes in the right places: consultation proposals' recently published by DCLG seek comments on the proposed methodology and transitional arrangements, as well as a policy on Statements of Common Ground. The consultation document also clarifies that government intends to publish revised updated National Planning Policy Framework Spring 2018.
45. There is a risk that the new methodology and resulting need, when finalised, may not accord with the SHMA and that other changes through the review of the National Planning Policy Framework may introduce new requirements on plan making or change the approach to plan making that will need to be taken into account. Officers will keep the position under review and carefully consider the Council's response to the consultation in collaboration with Swindon Borough Council.

Financial Implications

46. The existing 2017/2018 budget for the Economic Development and Planning Service will meet financial implications of carrying out the Regulation 18 consultation on the Wiltshire Local Plan Review. New evidence will be required to support the evolving plan and the Swindon and Wiltshire Joint Spatial Framework in the later part of 2017/18 and in the financial years 2018/19 to 2019/20.
47. As reported to the September Cabinet meeting, this will involve commissioning of work from external sources due to the technical expertise required or internal resourcing, for example, traffic modelling. Economies of scales suggest some additional evidence could be jointly commissioned with Swindon Borough Council, but this will be decided on a project by project basis. Other evidence may be prepared using 'in-house' resources of the Councils, for example, the Strategic Housing and Employment Land Availability Assessment. Initial estimates suggest a rolling budget of £500,000 per year may be required.
48. Adoption of the Wiltshire Local Plan will help bring forward new sites for housing, thereby enabling the Council to benefit from revenue and capital associated with the delivery of new homes including contributing to the Council's Council Tax base.

Legal Implications

49. In accordance with the Planning and Compulsory Purchase Act 2004 (as amended), the Council has a statutory duty to prepare planning policy, which has been reinforced through the National Planning Policy Framework and the Localism Act 2011. The proposals in relation to Regulation 18 Town and Country Planning (Local Planning) (England) Regulations 2012 consultation have been prepared consistent with legislation.
50. As illustrated by the government's housing White Paper and more recently in the 'Planning for the right homes in the right places: consultation proposals', changes to legislation and the National Planning Policy Framework are being proposed as part of the government's planning reforms. Currently, it is not clear what the full implications will be for the review of the Wiltshire Local Plan as proposals are still the subject of consultation but officers will monitor any changes in legislation or national planning policy as part of the plan making process.
51. Publishing the regulation 18 consultation in the autumn 2017 is in accordance with the Council's recently approved Local Development Scheme 2017.
52. The Council has a statutory duty to engage with local communities and other stakeholders bodies at this stage in the process in accordance with its Statement of Community Involvement. Furthermore, Section 110 of the Localism Act 2011 introduces a 'Duty to Cooperate' in relation to planning for sustainable development (as a new section 33A into the Planning and Compulsory Purchase Act 2004). This requires Wiltshire Council to engage constructively, actively and on an on-going basis to maximise planning on strategic cross boundary issues. Such engagement will be embedded in the plan making process for both Swindon and Wiltshire.
53. The Council's obligations under the 'duty to cooperate' have informed the proposal for joint working with Swindon Borough Council. As identified above, the housing White Paper and recent consultation proposals by DCLG place greater emphasis on the duty to cooperate across boundaries and the need for wider strategic thinking. The preparation of a Joint Spatial Framework responds to the direction set by the White Paper as reinforced in the recent proposals..
54. Once adopted, the Wiltshire Local Plan will form part of the statutory development plan for the area and be used as such for the purpose of determining relevant planning applications across Wiltshire.

Options Considered

55. The options open to the Council are limited as Wiltshire Council is required to maintain up-to-date planning policies within the county. The options considered by officers have related to the best way to achieve that. For example the options for joint working with Swindon Borough Council in relation to the duty to cooperate were set out in the September

12 Cabinet report. The programme of work to pursue independent local plan reviews supported by a non-statutory joint spatial framework were considered to present the most appropriate balance in order to: fulfil the authorities' duty to cooperate; maintain a 5 year housing land supply as required by national policy; avoid confusion in relation to delivery timescales; and avoid 'consultation fatigue' and disengagement by the public.

Conclusion

56. The proposed format of the Regulation 18 consultation on the scope and content of the Wiltshire Local Plan Review will provide a robust basis for the review and roll forward of development proposals in the county. The consultation documents seek to raise awareness and seek views on the strategic issues facing the area which should inform plan making and influence the future pattern of development across Wiltshire. Additionally they establish the basis for joint working with Swindon Borough Council. The review is timely in order to maintain up-to-date planning policies in Wiltshire and guard against speculative, unplanned development.

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02 October 2017

Appendices

Appendix 1: Draft Swindon and Wiltshire Joint Spatial Framework Issues Paper

Part 1 - Swindon and Wiltshire Joint Spatial Framework Issues Paper
Part 2 - Chippenham Housing Market Area
Part 3 - Salisbury Housing Market Area
Part 4 - Swindon Housing Market Area
Part 5 - Trowbridge Housing Market Area

Appendix 2: Draft Wiltshire Local Plan Review Position Statement (Sept 2017)

Background Papers None

APPENDIX 1 (Part 1)

SWINDON AND WILTSHIRE JOINT SPATIAL FRAMEWORK: ISSUES PAPER

1. INTRODUCTION

Help shape the future of your area

Swindon Borough and Wiltshire Councils have a duty to plan for the new homes, jobs and infrastructure needed to support the growing communities of each area while protecting the local environment and quality of life.

Local plans set out a vision and framework for the future development of an area; meeting needs and realising opportunities in relation to housing, the economy, community facilities and infrastructure. They are also the means to protect the environment, adapt to climate change and secure good design. By law, they are the basis upon which decisions are reached for individual development proposals that require planning permission.

Two separate local plans, one for Wiltshire and one for Swindon Borough, plan to 2026. Swindon Borough and Wiltshire Councils are now working together to review their respective local plans and extend the period to which their plans relate to 2036.

We would like your views on the issues and opportunities within Swindon Borough and Wiltshire that will help shape future growth in the area. The section on 'How to comment' at the beginning of this document explains how to submit your views.

Within this document are also a number of questions to help you respond to the consultation.

Why are we reviewing our Local Plans?

Having up to date Local Plans in place promotes sustainable development and ensures each Council can shape growth to serve the wider public interest.

National planning policy in the form of the National Planning Policy Framework (NPPF) states that local plans should be '*drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date*' (paragraph 157). The adopted Local Plans' time horizons of 2026 are only 9 years away, less than the preference expressed in the NPPF.

The NPPF also states that "*Most Local Plans are likely to require updating in whole or in part at least every 5 years. Reviews should be proportionate to the issues in hand*"¹.

¹ Planning Practice Guidance Paragraph: 008 Reference ID: 12-008-20140306

It is, therefore, time to begin reviewing the current plans to maintain up to date planning policy and look ahead to 2036.

Joint Working between Swindon Borough Council and Wiltshire Council

Local planning authorities are legally required to co-operate with each other over issues that transcend administrative boundaries. A range of different issues cross over the boundaries of Swindon Borough, Wiltshire and other Councils and the appropriate means to deal with them varies accordingly. Several issues will benefit from direct co-operation between Swindon Borough Council and Wiltshire Council.

How should the two Councils work together?

Different approaches to working together are being used by councils in England and a number of options have been considered. For example, some councils have cooperated informally, while others have opted to prepare joint documents, either in the form of one combined local plan or by preparing a framework which would be followed by individual local plans.

Swindon Borough Council and Wiltshire Council have agreed to prepare and publish a non-statutory **Joint Spatial Framework** for Swindon Borough and Wiltshire. It will inform their respective Local Plan reviews by providing a clear strategic context across the wider area.

The preparation of a Joint Spatial Framework enables effective input from the community and stakeholders on strategic issues within each authority area and those that cross administrative borders. Its scope and process would be less legalistic than the preparation of a statutory Joint Plan and would enable the Plan reviews to proceed more quickly and efficiently.

Each Local Plan will have different scopes for their review. Some topics may need to be revisited in the Swindon Borough Local Plan but not in the Wiltshire Core Strategy, and vice versa. The detail for each Local Plan is contained in separate consultation papers prepared by each Council, as follows:

- Wiltshire Local Plan Review Position Statement
- Swindon Borough Council Local Plan Review Issues and Options Paper

This paper is relevant to both Local Plans, as it addresses specifically those issues that need to be addressed jointly and specifically the role of a Joint Spatial Framework.

What is the timetable for the Local Plan Reviews?

To facilitate joint working Wiltshire Council and Swindon Borough Council have aligned their plan review timetables, this is set out in Table 1, below.

The timetables for the review of the Local Plans are set out in the Councils' respective Local Development Schemes. Swindon Borough Council and Wiltshire Council have both recently updated their Local Development Schemes to align their Plan review timetables to facilitate joint working across the wider areas. The Local Development Schemes are available on the respective Councils' web sites.

2. THE JOINT SPATIAL FRAMEWORK

What is the Swindon and Wiltshire Joint Spatial Framework?

The Joint Spatial Framework will not be a statutory planning document², so it will not be examined by a government appointed planning inspector, nor will it become part of either Councils' formal Development Plan; and therefore will not be used in the determination of planning applications. However, the Joint Spatial Framework will be as a result of joint working, and be based on a joint evidence base. It will be formally agreed by both Councils as a basis for coordinating their respective Local Plan reviews.

Scope of the Joint Spatial Framework

The Joint Spatial Framework will guide the overall strategy and distribution of development across the wider area of the two Councils, but decisions over detailed site allocations will be made through the Councils' individual Local Plan reviews. Similarly, policies to guide the determination of planning applications will be set out in the Local Plan reviews, not in the Joint Spatial Framework.

The proposed scope of the Joint Spatial Framework is set out below.

Consultation Question 1:

Do you agree with the proposed scope of the Swindon and Wiltshire Joint Spatial Framework as set out below? If not please explain why.

Proposed Scope of the Swindon and Wiltshire Joint Spatial Framework

- i. The Joint Spatial Framework would set out in broad terms the quantum and spatial distribution of new jobs, homes and infrastructure in Swindon and Wiltshire in the period 2016-2036.
- ii. The Joint Spatial Framework would be non-statutory and would not therefore be a development plan document or subject to examination in

² In respect of the provisions contained within the Planning and Compulsory Purchase Act 2004 (as amended).

- public in its own right. However, it would be tested through the examination of the respective local plans. The Local Development Scheme timelines will be aligned to allow for the conjoined examination of the cross boundary matters between both Councils arising from the Joint Spatial Framework.
- iii. The Framework would cover all of Wiltshire and Swindon but would include separate sections for each Housing Market Area (HMA). There are best fit Functional Economic Market Area (FEMA) definitions with the HMAs that will allow the alignment of jobs and workers at the HMA level to form the basis for plan making.
 - iv. The section of the Framework which concerns the Swindon HMA and the 'Swindon/M4 corridor' FEMA will be based on evidence prepared through joint working by Swindon Borough Council and Wiltshire Council.
 - v. Those sections of the Framework covering the other Wiltshire HMAs (the Chippenham, Salisbury and Trowbridge HMAs) and 'A350/West Wiltshire towns' and 'Salisbury/Amesbury/A303' FEMAs will be led by Wiltshire Council with joint working undertaken only in relation to cross-boundary implications with the Swindon HMA and/or 'Swindon/M4 corridor' FEMA.
 - vi. A consultation strategy will be prepared for the Joint Spatial Framework in line with the Councils' respective Statements of Community Involvement (SCI). Joint public consultation will be held to develop the Joint Spatial Framework. This consultation will not be part of the formal Local Plan review process, which will need to be undertaken separately by each respective planning authority in relation to their plans, but will be programmed to inform and be aligned with the Local Plan review process. The Framework will also be informed by consultations on the local plan reviews.
 - vii. The final Joint Spatial Framework would be agreed by both authorities to inform the Local Plan reviews and support the Regulation 19 pre-submission consultations.
 - viii. The Framework would broadly set out the overall scale and distribution by authority and HMA of housing growth in the plan period.
 - ix. Through an iterative process the broad spatial distribution of housing development is agreed through the Framework to meet the identified needs, as appropriate, across the respective HMAs. This will include the identification of broad locations where growth will take place. However it will not identify specific sites as this will be a matter for the individual local plans to address.

- x. The Framework will identify the overall scale and distribution of planned employment land by FEMA and authority.
- xi. The Framework will identify strategic employment locations but not individual sites.
- xii. The Framework will identify the infrastructure needed to support the level of growth, in particular transport infrastructure.

What are the objectives of the Swindon and Wiltshire Joint Spatial Framework?

We have identified five objectives for the Joint Spatial Framework that will guide further work in its preparation. In particular, the objectives will be used to compare alternative development strategy options and so choose a preferred approach.

The objectives take account of the proposed scope and purpose of the Joint Spatial Framework. For example, detailed design objectives are not included because they are more applicable to the Local Plan reviews. The objectives therefore focus on much broader aspects that also involve resolving cross-boundary issues.

The objectives derive from those contained within the adopted Swindon Borough Local Plan and Wiltshire Core Strategy, and reflect national planning principles.

Consultation Question 2:

Do you agree with the proposed objectives for the Swindon and Wiltshire Joint Spatial Framework as set out below? If not, please describe how they should be changed?

Proposed Joint Spatial Framework Objectives

Objective 1 - Housing

Enable each housing market area to meet the needs for housing by a distribution that supports the role and function of settlements and takes into account their functional relationships.

Objective 2 - Economy

Facilitate local and inward investment by meeting land requirements for existing and emerging businesses in each functional economic market area; supporting the roles of town centres, business clusters and the regeneration of Swindon's central area and other priority areas for regeneration elsewhere.

Objective 3 - Resilient communities

Ensure that new development supports resilient communities with the necessary infrastructure, facilities and services. Manage patterns of growth to make the most effective use of existing and enhanced infrastructure.

Objective 4 - Environment

Make the most effective use of land, avoid increased risks from flooding and respect and enhance the environmental quality of Swindon and Wiltshire, specifically nationally designated landscapes, heritage and biodiversity assets, air quality and the best agricultural land.

Objective 5 - Accessibility and transport

New development should maximise opportunities for public transport use and active travel methods, be focussed at locations which would not exacerbate net out-commuting nor cause unacceptable pressures on existing transport infrastructure and make the best use of existing and planned transport investment.

What is the relationship of the Joint Spatial Framework to the Local Plan Reviews?

Preparation of the Joint Spatial Framework will be carried out alongside the reviews of the respective Local Plans. Consultation feedback on the Local Plan reviews and on-going discussions with adjacent Councils will inform and shape the Joint Spatial Framework. The timetable for the production of the Joint Spatial Framework in relation to the Local Plans reviews is set out below.

Table 1: Aligned Local Plan Review and Joint Spatial Framework Timetable

| | | Local Plan Review | Links | Joint Spatial Framework |
|------|----|--------------------------------------------------------------|--------------|----------------------------------------|
| 2017 | Q1 | Plan Preparation & Evidence Gathering | □ | Preparation & Evidence Gathering |
| | Q2 | | | |
| | Q3 | | | |
| | Q4 | Issues & Options Consultation (Regulation 18) | | Scoping & Methodology Consultation |
| 2018 | Q1 | Plan Preparation & Evidence Gathering | □ | Draft Framework Preparation |
| | Q2 | | □ | Draft Framework Consultation Commences |
| | Q3 | | □ | Final Framework Preparation |
| | Q4 | Preferred Options Consultation (Regulation 18) | | |
| 2019 | Q1 | Submission Draft Plan Preparation | □ | Completion of Framework |
| | Q2 | Submission Draft Plan Consultation (Regulation 19) Commences | | |
| | Q3 | Final Submission Plan Preparation | | |
| | Q4 | | | |
| 2020 | Q1 | Submission (Regulation 22) | □ | |
| | Q2 | Examination Process | | |
| | Q3 | | | |
| | Q4 | Inspector's Report | | |
| 2021 | Q1 | Adoption | | |

3. AN EVIDENCE BASED APPROACH

What new evidence is required to support the Swindon and Wiltshire Joint Spatial Framework?

The Councils' Local Plan reviews need to be prepared on the basis of appropriate and proportionate evidence. The Local Plan policies and proposals, once submitted to the Secretary of State, will be examined by an independent Inspector and the evidence behind the plan tested. Further evidence will need to be gathered to support this process. The extent and scope of the evidence needed will be determined as part of the plan making process.

The NPPF specifically requires that each Local Plan is based on an objective assessment of need in order to help gauge future levels of housing and employment growth.

Consequently, the Councils' have jointly prepared two evidence base reports:

- The Swindon and Wiltshire Strategic Housing Market Area Assessment 2017 (SHMA)
- The Swindon and Wiltshire Functional Economic Area Assessment 2017 (FEMAA)

Both documents have been prepared to support this consultation on the scope of the Local Plan reviews and are available on the Councils' websites. These documents provide current evidence of the need for new homes and jobs in Swindon and Wiltshire from 2016 up to 2036. It is important to stress they do not represent the policy of the two Councils and that this evidence will be tested through the plan making process. They will also be kept under review during the plan making process to ensure that the Joint Spatial Framework is based on the most up to date household projections and reflects government planning policy that is currently under review (see below).

What is the need for new homes up to 2036?

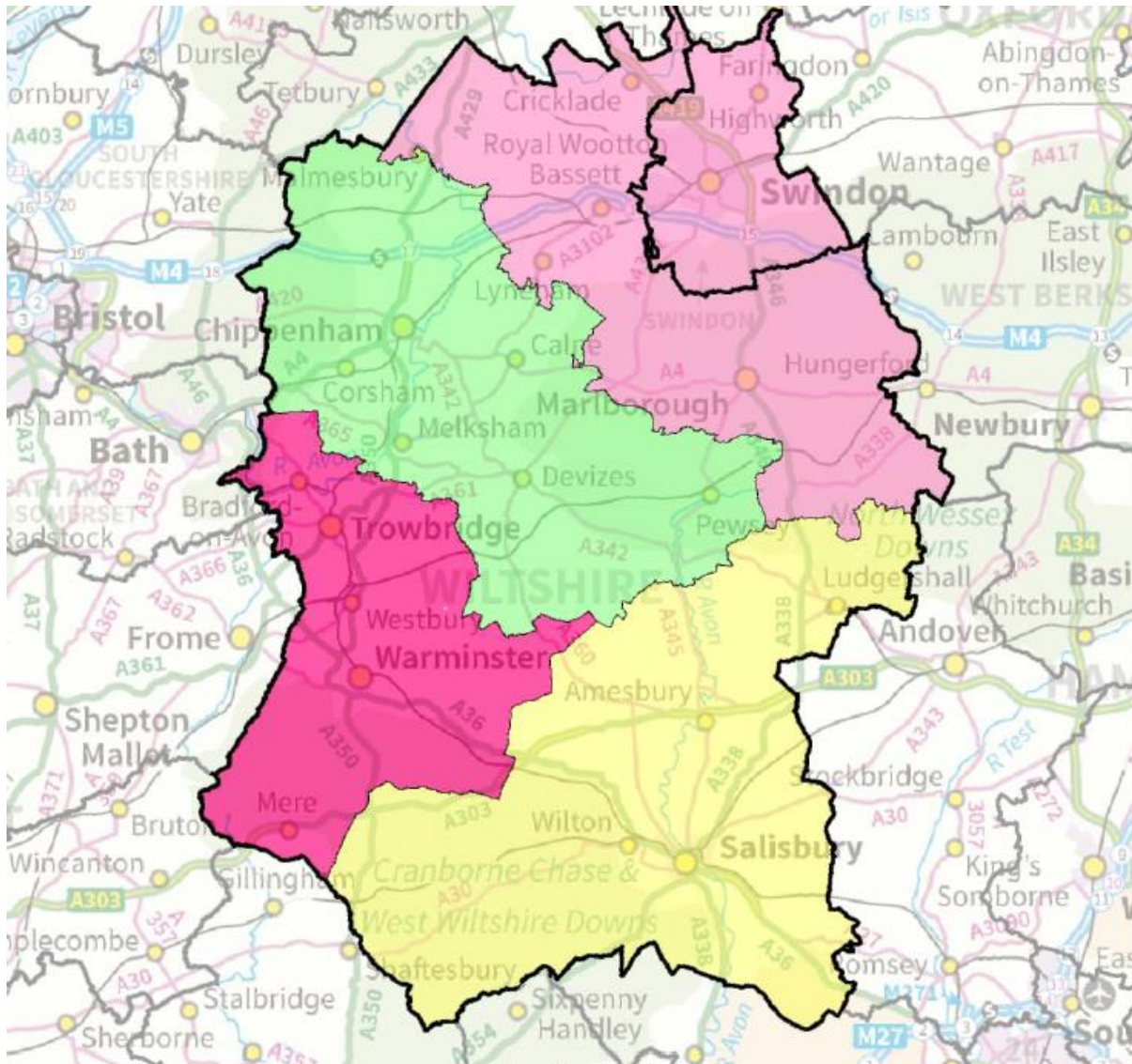
The SHMA indicates that Wiltshire and Swindon Borough should plan for a need for 3,650 new homes per year between 2016 and 2036. The current local plans, looking to 2026, plan for a combined requirement for 3,567 homes. The overall rate of growth anticipated in the SHMAA is broadly unchanged.

Out of the total needs, a number of homes are already accounted for because land already has planning permission or is allocated in current or emerging plans (together referred to as 'commitments') or homes have been built. At 1 April 2017, this is approximately 46,000 homes. This suggests that land to accommodate a

further 27,000 new homes would be needed to meet the scale of needs suggested in the SHMA.³

The SHMA disaggregates its assessment of housing need to four housing market areas, which are illustrated on the map below.

Figure 1: Proposed Housing Market Areas



³ This figure does not take into account an assessment of windfall or new brownfield land opportunities for the delivery of homes within each authority. These assessments are part of the process of plan making.

In summary, the overall total is 73,000 dwellings for the period 2016-2036 to meet need as identified in the SHMA, with the need in each housing market area being:

- Swindon HMA: 29,000 dwellings (of which approximately 22,500 homes have been built or committed);
- Chippenham HMA: 22,250 dwellings (of which approximately 9,000 homes have been built or committed);
- Salisbury HMA: 8,250 dwellings (of which approximately 8,000 homes have been built or committed);
- Trowbridge HMA: 13,500 dwellings (of which approximately 6,500 homes have been built or committed).

The SHMA projects a minimum additional affordable housing need in Wiltshire and Swindon Borough as a whole of 17,253 households over the period 2016-2036. When this is added to current need, it leads to a requirement for 22,756 additional affordable dwellings for the period 2016-2036 (23,053 taking into account vacancy). The affordable housing need in Swindon Borough of 8,380 equates to 31% of total projected housing needs. In Wiltshire, the affordable housing need is projected to be 14,376, 36.9% of total projected housing need. Affordable housing need is not additional to the total housing need identified but is a component of that need.

The government in September 2017 issued for consultation⁴ a draft methodology on a standardised approach to assessing the objectively assessed need for housing as proposed in the Housing White Paper 'Fixing the broken housing market' (February 2017). The current proposals suggest that the standardised methodology will become the default objectively assessed need for Wiltshire and Swindon for the Local Plan Reviews. The Councils will review the figures as the standardised methodology is finalised and in the light of any more recent household projections. In order to make timely progress on the Local Plan reviews the Councils' have made available the 2017 SHMA to inform the process.

Consultation Question 3:

The Swindon and Wiltshire Strategic Housing Market Assessment (SHMA) presents technical evidence of the projected level of housing needs in the period 2016 to 2036. Do you have any comments on the findings of the SHMA?

How much additional employment land does the FEMA propose?

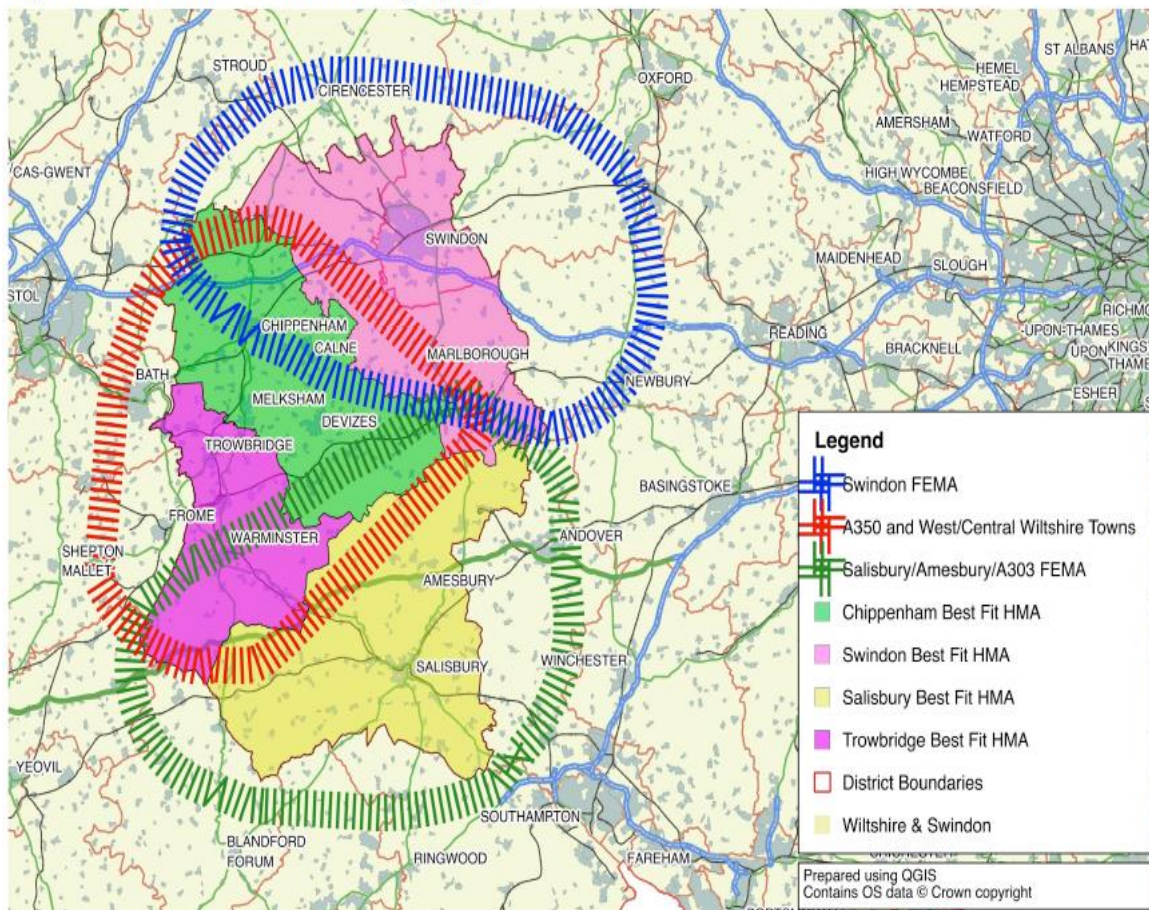
The Functional Economic Market Area Assessment provides an indication of the likely demand for land for industrial and office development between 2016 and 2036.

⁴ Department for Communities and Local Government, Planning for the right homes in the right places: consultation proposals', 14 September 2017

It does so by reference to overlapping 'best fit' functional economic market areas (FEMA). It identifies three such areas based around Swindon, the A350 and Salisbury - Swindon/M4 FEMA, A350 and West/Central Wiltshire Towns FEMA, and Salisbury/Amesbury/A303 FEMA.

Figure 2: Proposed Functional Economic Areas and Housing Market Areas

Figure 2.6 FEMA and HMA Geography



The headline figures for 2016-2036 employment growth and office and industrial floor space suggested requirements by FEMA as follows:

| FEMA | Number of jobs 2016-2036 | Additional Office (ha) 2016-2036⁵ | Additional Industrial (ha) 2016-2036 |
|--------------|-------------------------------------|-------------------------------------------------------------|-----------------------------------------------------|
| Swindon FEMA | 15,030 | 19.2 - 47.9ha | 87ha |
| A350 FEMA | 13,770 | 8.3 - 20.8ha | 83.1ha |

⁵ The requirement for office land is provided as a range to reflect the difference in plot ratios (i.e. the density of development on a site) between urban and greenfield sites. For example, more land would likely be needed for offices built on greenfield sites compared to those built in town centres.

| | | | |
|----------------|--------|--------------|--------|
| Salisbury FEMA | 11,430 | 6.3 - 15.6ha | 44.4ha |
|----------------|--------|--------------|--------|

As with the assessment of housing need, these conclusions will be tested through the preparation of the Joint Spatial Framework and Local Plans.

Consultation Question 4:

The Functional Economic Market Area Assessment (FEMAA) presents technical evidence of the projected level of need for employment land in the period 2016 to 2036. Do you have any comments on the findings of the FEMAA?

How will the SHMAA and FEMA results be tested through the Swindon and Wiltshire Joint Spatial Framework?

A proposed programme of work on the Joint Spatial Framework and each local plan review is attached at **Appendix 1** to this Paper. It is based on a number of steps which relate to the plan making process outlined in each council's Local Development Scheme.

The NPPF requires that each Local Plan meets the full objectively assessed need for housing in the housing market area as far as is consistent with the policies set out in the NPPF. The programme of work leading to a Joint Spatial Framework focuses on an assessment of alternative development strategies within each HMA and across the two Plan areas to consider how issues that cross HMA boundaries are addressed.

As part of this the role and function of settlements will be reviewed. Alternative development strategy scenarios may continue to promote the existing role of a settlement or suggest changes to the existing role. Unmet needs in one market area may need to be met by another. The alternative development strategy scenarios will be compared and tested using sustainability appraisal and by how well they perform against the Joint Strategic Framework objectives. A preferred strategy will be selected using this evidence that will then be developed into the final Joint Spatial Framework.

Consultation Question 5:

Do you consider that the methodology proposed in the programme of work to test the sustainability of delivering the scales of growth in each housing market area and each functional economic area is robust? If not, in your response please explain why.

4. SETTLEMENT AND HOUSING MARKET AREA PROFILES

The programme of work discussed above includes an assessment of Swindon, Chippenham, Salisbury, Trowbridge and Wiltshire's market towns to understand the strategic issues they face. This is a first step to understanding the opportunities and constraints to growth before considering how each place could develop sustainably; whether its role continues as currently planned or how it should change.

In combination, this better understanding of our main settlements can inform the assessment of whether and how the housing and employment needs in each market area can be met.

Published alongside this consultation Paper are four documents containing **Housing Market Area Profiles** that relate to the new proposed geographies contained within the SHMA and contain profiles of the main settlements in each area as set out below.

- Chippenham Housing Market Area - Chippenham, Calne, Corsham, Devizes, Malmesbury, Melksham
- Salisbury Housing Market Area - Salisbury, Amesbury, Tidworth and Ludgershall
- Swindon Housing Market Area - Swindon, Marlborough, Royal Wootton Bassett
- Trowbridge Housing Market Area - Trowbridge, Bradford on Avon, Warminster, Westbury

These profiles draw on existing published data sources such as the current role and function of each main settlement, as stated in the Councils current adopted Plans, the 2011 Census, the Councils own monitoring reports and other local area documents such as made and emerging neighbourhood plans.

Each profile identifies strategic issues at both a settlement and housing market area level.

What are considered to be the strategic issues in relation to the Chippenham Housing Market Area?

The Chippenham housing market area stretches from Wiltshire's borders with Cotswold District and South Gloucestershire in the north to the Vale of Pewsey in the south. It includes the principal settlement of Chippenham and market towns of Calne, Corsham, Devizes, Malmesbury and Melksham.

The Housing Market Area lies within the A350 and West/Central Wiltshire Towns FEMA. The northern part of the HMA also lies within the Swindon/M4 FEMA.

In summary, the strategic issues for the Chippenham housing market area at this stage are:

- The SHMA suggests an increase in housing needs. Do settlements in the HMA have the potential for economic development to support balanced growth? If not and it is then decided that not all the suggested housing need should be met in the HMA, where else should the remainder be met?
- Are some settlements much more constrained? Are some settlements more suited to growth than others? If so, which ones would be and why?
- Is there scope to bring about more re-use of brownfield sites to limit the loss of greenfield land? If so, how could this be realised?
- What would be the effect on commuting patterns of higher rates of house building? Looking to 2036, what should be the key investments in transport?

What are considered to the strategic issues in relation to the Salisbury Housing Market Area?

The Salisbury Housing Market Area comprises the south and east of Wiltshire and borders with Dorset and Test Valley Borough. It includes the principal settlement of Salisbury, and the market towns of Amesbury, Tidworth and Ludgershall.

The Salisbury HMA broadly aligns with the Salisbury/Amesbury/A303 FEMA.

In summary, the strategic issues for the Salisbury housing market area at this stage are:

- The SHMA suggests a modest decrease in housing needs in the Salisbury HMA, but the FEMAA states that a shortfall of labour could result. Could economic growth be hampered by insufficient housing over the plan period and should housing provision instead exceed assessed needs?
- A central proposal for Salisbury contained in the Core Strategy, and therefore for the HMA as a whole, is the redevelopment of Churchfields, should this proposal be reconsidered? How can this opportunity be realised?
- Important business clusters in the HMA are quite detached from main settlements. Environmental constraints in the HMA might also possibly restrict further significant expansion of these main settlements? Is there a need to re-think where and how growth takes place in the HMA?

What are considered to the strategic issues in relation to the Swindon Housing Market Area?

The Swindon Housing Market area stretches across the north east of Wiltshire and encompasses all of Swindon Borough. In addition to the large town of Swindon, it also includes the market towns of Marlborough and Royal Wootton Bassett.

The Swindon HMA broadly aligns with the Swindon/M4 Functional Economic Market Area. However, the south west of the HMA also overlaps with the A350 and West/Central Wiltshire Towns FEMA.

In summary, the strategic issues for the Swindon housing market area at this stage are:

- How much of the additional housing needs of the HMA could and should be planned for within and/or at the urban area of Swindon? How can this be balanced against the objectives of respecting the environmental quality of the area for existing communities and maintaining a diversity of uses needed to support a thriving economy? Is infrastructure a constraint to such growth?
- How can we deliver high quality employment land in the right locations to support existing businesses and take advantage of inward investment opportunities in the Functional Economic Market Area?
- What is the role of the market towns and other rural settlements within the Housing Market Area?

What are considered to the strategic issues in relation to the Trowbridge Housing Market Area?

The Trowbridge Housing Market Area encompasses the area around the principal settlement of Trowbridge and the market towns of Bradford on Avon, Westbury and Warminster.

The Housing Market Area lies within the A350 and West/Central Wiltshire Towns Functional Economic Market Area. The southern part of the HMA also lies within the Salisbury/Amesbury/A303 FEMA.

In summary, the strategic issues for the Trowbridge housing market area at this stage are:

- The SHMA suggest a modest increase in housing needs, but a surplus of workers compared to jobs within the area, should housing needs be met in the HMA? And if not where else?

- Should the extent of the green belt be reviewed to enable development needs to be met?
- What are the relationships (1) between settlements within the HMA and (2) with settlements outside; and how might transport infrastructure attract inward investment or influence commuting patterns?

Consultation Question 6:

The Housing Market Area profiles present the current Plan's vision for each settlement based on its role and function. Do you think this should change? Please tell us which settlement(s), and explain your answer.

For each settlement identified in the Housing Market Area Profiles there are also a number of key findings and issues identified. Do you think these are correct and how should the Councils respond to the questions raised? Please tell us which settlement(s), and explain your answer.

Consultation Question 7:

For each Housing Market Area, strategic issues are also identified. Do you think these are correct and how should the Councils respond to the questions raised? Please explain your answer by reference to a specific housing market area.

Consultation Question 8:

Are there any specific development constraints that you think should be taken into account in the preparation of the Joint Spatial Framework that have not been identified in the Housing Market Area Profiles? Please explain your answer by reference to a specific housing market area or settlement.

Consultation Question 9:

Are there any specific development opportunities that you think should be taken into account in the preparation of the Joint Spatial Framework that have not been identified in the Housing Market Area Profiles? Please explain your answer by reference to a specific housing market area or settlement.

Consultation Question 10:

Do you have any comments on the advantages or disadvantages of any of the following concepts for growth alone or in combination? Are there other options not considered. Please explain your answer by reference to a specific housing market area or settlement.

- Urban capacity (maximising the potential for growth within Chippenham, Salisbury, Swindon, Trowbridge and market towns in Wiltshire)
- Urban extension (focussing growth on extensions to Chippenham Salisbury, Swindon and Trowbridge and market towns in Wiltshire.
- Transport-based development (locating development where it will have the best access by a range of transport modes)
- More development at the larger, better served rural settlements
- New settlement(s) (the development of one or more new settlements within the area)

Consultation Question 11:

Do you have any further comments to make on the proposed Joint Spatial Framework or matters raised in this Paper?

Appendix 1: Programme of Work

1 Joint SHMA and FEMAA

- 1.1 Preparation of Strategic Housing Market Assessment and Functional Economic Market Area Assessment as evidence to inform the Swindon Borough and Wiltshire Local Plan reviews.

2 Revise Local Development Schemes

- 2.1 The Councils' respective Local Development Schemes have been updated to reflect the proposed approach to joint working and the timetables for preparation of the Swindon Borough and Wiltshire Local Plan reviews.

3 Strategy Review - Main Settlement Assessment

Objective: To identify strategic issues relating to individual settlements and Housing Market Areas and Functional Economic Market Areas

- 3.1 The National Planning Policy Framework requires that local planning authorities should set out the strategic priorities for their area and Local Plans should include strategic policies to deliver them. The starting point for review is therefore the current set of strategic policies in the existing plans.
- 3.2 The 'main settlements' of Chippenham, Salisbury, Swindon, Trowbridge and the designated Market Towns deliver a wide range of strategic priorities, as the principal locations for homes and jobs, the provision of retail, leisure and other commercial development, as well as transport, education, health, cultural and other infrastructure. They are therefore the primary focus for review.
- 3.3 Elsewhere the foremost priorities of the adopted Wiltshire Core Strategy and Swindon Local Plan are broadly to support rural communities by development geared towards meeting local needs or to constrain it in order to preserve the countryside and ensure a sustainable pattern of growth across the plan areas that minimises the need to travel by car.
- 3.4 Further evidence and choices later on in the plan preparation process may reconsider this approach depending upon what issues are identified and what the evidence suggests (See stage 5, step 1). For example, a specific rural settlement may take on a more important strategic role if evidence suggests this could be an element of a reasonable alternative development strategy.

- 3.5 Assessments will identify strategic issues affecting each main settlement both currently and looking to the future. Issues are considered to be strategic, for example, when there are circumstances that may prevent growing the economy to its full potential or hinder building strong communities. Limited land supply may be restricting economic growth. Environmental constraints may limit the amount of land capable of acceptable development. These are both instances of strategic issues. Strategic issues affecting the main settlements may affect the wider delivery of the strategic priorities for the area (as defined in the NPPF).
- 3.6 In Swindon, the review will involve the scope and success of regeneration at targeted areas in need of renewal and the implementation of the Swindon Central Area Action Plan. This will help understand the deliverable capacity of the urban area to accommodate growth.
- 3.7 Issues at main settlements may affect the HMA or FEMA's overall capacity to accommodate projected need. Strategic issues may also highlight relationships between main settlements as well as with other rural settlements.
- 3.8 This stage will comprise 4 steps that are summarised below.

Step 3a - Role and function review

- 3.9 Each settlement will be reviewed by comparing the changes envisaged by the current plan with what has taken place by undertaking:
- I. A quantitative assessment of the potential to deliver the current strategy
 - II. A qualitative assessment of current strategy
 - III. A review of other strategies that will affect each settlement's future

Step 3b - Infrastructure review

- 3.10 This step would identify committed infrastructure improvements, shortfalls that might constrain growth and known aspirations at each main settlement that could be addressed through the review of the Plan. It would also seek to identify any critical infrastructure items that would be essential to support future growth.

Step 3c - Review constraints

- 3.11 The purpose of this step is to identify possible environmental obstacles to the growth of main settlements. A constraints mapping exercise will not consider specific sites. It will gauge the potential extent of locations able to accommodate development.

Step 3d - Identification of strategic issues

- 3.12 The outcome of steps 3a to 3c for each main settlement provides a description of need and demand on one side and opportunities and constraints on the other. A comparison of the two provides a concise set of strategic issues for each main settlement and their prospects for growth. Some issues may also be shared between settlements or may affect the whole HMA or FEMA.
- 3.13 The results of this stage would be published in a short Issues Paper and will include a review of current Plan objectives to draft objectives for the Joint Spatial Framework. It may also outline possible broad approaches that the Joint Spatial Framework may explore as a means to stimulate public discussion.

4 Issues Consultation (Initial concurrent Regulation 18 consultations)

Objective: To raise awareness and seek views on the approach to Plan review

- 4.1 The proposed scope for the consultation is outlined in each authority's Local Development Scheme. The consultation would run for a minimum of 6 weeks in winter 2017 concurrently in each local authority area.
- 4.2 The consultation will:
- Seek comments on the proposed scope of the Local Plan reviews;
 - Invite comments on the proposed objectives and approach to developing the Joint Spatial Framework;
 - Invite comments on the strategic issues identified as a result of main settlement review;
 - Invite the submission of sites for consideration through a call for sites (this would only apply to additional sites not previously considered through the Swindon Borough SHELAA and Wiltshire SHLAA);
 - Raise awareness of the completed SHMA/FEMAA; and
 - Ask consultation questions to obtain opinions on broad spatial options.
- 4.3 The authorities will undertake consultation on their respective Sustainability Appraisal scoping reports as part of the Regulation 18 consultations.
- 4.4 A central part of the consultation would be the publication of an Issues Report produced from the preceding step. Comment would be invited on these issues and suggestions on how they should be addressed. The result of this stage would help identify where further evidence would be needed.

- 4.5 The outcome of consultation will be a refined set of strategic issues. Plan objectives will be reviewed. Detailed project briefs for further work on the Joint Spatial Framework and Local Plans will identify further evidence that needs to be gathered to address gaps identified in understanding and to help develop alternative development strategies.

5. Develop Alternative Development Strategies

Objective: To create a number of Alternative Development Strategies each capable of meeting Objectively Assessed Needs (OAN)

- 5.1 The aim of this stage will be to establish and assess the sustainability of different strategies for growth in each HMA. Different development strategies will contain indicative requirements for employment and housing land for each of the main settlements. They will also include estimates for growth in the rural area and an allowance for windfall. One or more alternative development strategies may also consider requirements at significant rural settlements (In Wiltshire defined as Local Service Centres and Large Villages, and in Swindon, Highworth and Wroughton and the larger villages within Swindon Borough).
- 5.2 Developing a set of alternative development strategies will draw on the SHMA and FEMAA (stage 1), responses to the Issues consultation (stage 4), and the main settlement assessment (stage 3).

Step 5a - Assess whether the OAN can be met in each HMA based on step 3 conclusions and, if necessary, estimate unmet need

- 5.3 This step determines the amount of additional housing and employment land that needs to be allocated in order to meet OAN for each HMA and FEMA
- 5.4 Based on evidence and assessments of step 3 it will be possible to judge
- an indication of the potential contribution each main settlement may make to meeting needs
 - the prospects of assessed needs being met within each respective HMA and FEMA
- 5.5 The scope of alternative development strategies may not be restricted to those involving the expansion of main settlements and could include:
- extending settlement analysis to consider whether specified significant rural settlements may appropriately accommodate growth greater than that geared to solely meeting local needs; apportioning unmet housing and employment needs to be in one or more adjoining HMAs or FEMA; or

- by the creation of a new community

Step 5b - Develop Alternative Development Strategies

- 5.6 This step develops alternative development strategies that can accommodate growth in each HMA. The output will be clear, justified alternative strategies for growth expressed to include requirements for housing and employment at each main settlement. These strategies will draw on the analysis and public consultation of previous stages. They will each address the strategic issues, refined by responses to the Issues Paper, and be informed by further evidence that will have been gathered. Alternative development strategies may also test different quanta of development for each HMA.
- 5.7 Directions for possible growth at main settlements will be considered using step 3c constraints mapping. The suitability of the areas involved could be considered in more detail in the preparation of local plan options (stage 8).
- 5.8 Specific significant rural settlements may also be considered as locations for growth alongside locations in and around main settlements if evidence suggests this course could be an effective means to address strategic issues and achieve a sustainable pattern of development. If appropriate, particular rural settlements would be considered in a similar manner to main settlements in stage 3⁶
- 5.9 An alternative development strategy that accommodates unmet housing and employment needs from an adjoining HMA will be guided by evidence of economic relationships and accessibility to where those needs arise.
- 5.10 This stage will generate a manageable set of alternatives that are a reasonable reflection of strategic choices for future patterns of growth in each Plan area.

Step 5c - Sustainability Appraisal

- 5.11 The strategy options identified in step 5b will be subject to comparative assessment against the sustainability themes set out in a draft sustainability appraisal framework (to be consulted on and agreed with the statutory consultation bodies the Environment Agency, Natural England and English Heritage) to identify the likely significant effects of each one. Assessment will identify the likely significant positive or adverse effects of the various spatial alternatives, and also the relative performance of each alternative against one another. The likely infrastructure requirements and mitigations measures needed to support each of the spatial options will be commented upon. The appraisal will recommend the alternative development strategies with the most sustainability benefits.

⁶ Steps 3.1- 3.3 could be carried out for specified significant rural settlements.

Step 5d - Policy Assessment

- 5.12 The strengths, weaknesses, opportunities and threats of each alternative development strategy will be assessed. This SWOT assessment will use the JSF objectives as its framework.

6 Selection of Preferred Strategy and Preparation of the Joint Spatial Framework

Objective: To identify a preferred strategy that delivers JSF objectives informed by Sustainability Appraisal.

- 6.1 Alternative development strategies will be compared on an equitable basis using the results of sustainability appraisal and SWOT assessment gathered in stage 5. Selection of a preferred strategy will have the goal of achieving the best overall balance of social, economic and environmental benefits.
- 6.2 Preparation of the draft JSF will articulate the preferred Alternative Development Strategy. The proposed scope of the Joint Spatial Framework was outlined in Section 2: Approach to Joint Working in the main report. In short, the draft Framework will identify a preferred broad approach to the development requirement and a strategy for growth in each HMA.

7 Draft Joint Spatial Framework consultation (Regulation 18 consultation)

Objective: To review and refine the content of the Joint Strategic Framework

- 7.1 The Joint Spatial Framework consultation would be run concurrently across Wiltshire and Swindon. It may use a shared consultation platform.
- 7.2 Responses to the consultation will assist in refining Local Plan options (step 8 below) as well as the main purpose of moving towards a final Joint Spatial Framework.

8 Local Plan Options

Objective: to identify and assess reasonable site options that could deliver the preferred development strategy approach as set out in the Joint Spatial Framework

Step 8a - Identify reasonable site options

- 8.1 This will be used to create a list of potentially reasonable site options for further assessment that are developable over the plan period. The register of Strategic Housing and Employment Land Availability Assessment (SHELAA) sites held by each council will be the starting pool of land from which site allocations will be selected. This stage will, however, also examine whether

there are additional site options and will include a review of existing employment allocations. The selection of site options will also be guided by the result of assessments of a settlement's potential for delivery carried out in stage 3.

Step 8b - Assessment of site options

- 8.2 Officer judgment will be used to assess the scale of housing and employment development that a site option can reasonably accommodate, drawing on SHELAA methodologies where applicable.
- 8.3 The purpose of step 8b is to augment SHELAA site analysis with more detailed information on the sustainability of site options. Sites will as necessary be subject to detailed assessments on such aspects as accessibility, landscape assessment and site viability. A proportionate approach will be taken, with the stages of assessment used as filters to refine and distinguish between reasonable site options. Not all sites will be subject to all stages of assessment. A template will be devised for the assessment. This will state the reasons for those sites rejected.

Step 8c - Sustainability Appraisal of Site Options

- 8.4 Detailed evidence gathered through site assessment will be used to inform a Sustainability Appraisal of reasonable site options. Draft decision aiding questions will be consulted on at Regulation 18 stage. Results will be presented through RAG (red, amber, green) analysis combined with qualitative discussions of the site options at each settlement.

Step 8.4 Selection of Preferred Sites

- 8.5 Informed by sustainability appraisal, site options will be selected to achieve the indicative housing and employment land requirements of each settlement referred to in the Joint Spatial Framework. Sites will be selected according to how well they address issues identified at the end of step 4 and achieve plan objectives. Together all the selected sites will be the preferred Local Plan options.

9 Consultation on Local Plan Options (Regulation 18)

Objective: To refine and review preferred Local Plan options

- 9.1 The consultations will be undertaken separately but concurrently by the two authorities. The consultation materials could take the form of consultation booklets outlining preferred options for site allocations (using site proformas), rather than the form of a draft plan, if necessary.

- 9.2 The final Joint Spatial Framework will confirm the strategic distribution of housing and employment growth which will be reflected in the Local Plan reviews.
- 9.3 Preferred sites will be reviewed and selections may be amended as a result of consultation.
- 9.4 At this stage each Local Plan may also include reviews undertaken of other topic areas such as green infrastructure strategy and town centre boundaries, where the approach of current Local Plans is in need of updating. Each Council will consult on such suggested changes to their existing plans.

10 Preparation and Sustainability Appraisal of Draft Local Plans

- 10.1 Draft Local Plans will be prepared in the light of consultations in stage 9. Separate Sustainability Appraisals will then be prepared to support the Swindon and Wiltshire Local Plan reviews. This will continue to use a shared Sustainability Appraisal Framework to ensure consistency across HMAs.
- 10.2 Each Sustainability Appraisal will recommend changes to the Plan based on addressing the in-combination effects of proposals and in order to ensure each Plan can achieve the most sustainability benefits.

11 Pre-submission consultation of Draft Local Plans (Regulation 19)

- 11.1 Each Plan is published for consultation prior to submission to the Secretary of State for independent examination.

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Appendix 1: Part 2

Chippenham Housing Market Area

**Individual Settlement and Housing Market Area
Profile**

DRAFT

Committee Draft

October 2017

Introduction

This document is one of four Housing Market Area Profiles which have been prepared to inform the Swindon and Wiltshire Joint Spatial Framework: Issues Paper. It provides an assessment of the main settlements in the Chippenham Housing Market Area and the strategic issues they face. This is a first step to understanding the opportunities and constraints of growth before considering how each place could develop sustainably; whether its role continues as currently planned or how it should change.

In combination with profiles for the Salisbury, Swindon and Trowbridge Housing Market Areas, this better understanding of our main settlements can inform the assessment of whether and how the housing and employment needs in each market area can be met.

The profiles contained in this document draw on existing published data sources such as the current understanding of the role and function of each main settlement, the 2011 Census, the Council's own monitoring reports and other local area documents such as neighbourhood plans.

Each profile presents a snapshot assessment of progress with the current strategy included in the Wiltshire Core Strategy, a picture of environmental constraints, the local community's vision (where there is neighbourhood plan) and the position from providers of underlying infrastructure (transport, water and education) which is essential to every settlement but which has the potential to also be a significant barrier to further growth.

The main findings for each settlement are summarised below followed by a set of issues specific to each settlement. These identify where the current development plan strategy may need to change. They are phrased as questions because the vital part of this stage in the Local Plan review is to invite community and stakeholder input on how the current strategy should change; what issues it should address and how future needs can be met by sustainable development.

Chippenham Housing Market Area

The Chippenham Housing Market Area extends from Malmesbury in the north to Devizes in the south and Pewsey in the east, with Chippenham town being the principal settlement within this Housing Market Area.



The 2017 SHMA forecasts objectively assessed need for housing (including the overall balance between market and affordable housing). The study identifies the need for housing in this market area over the period 2016-2036 to be 22,500 dwellings. This would represent a substantial increase on the WCS period 2006-2026.

The SHMA notes that demographic projections indicate a surplus of workers in the HMA.

Chippenham town falls into the A350 FEMA. However, given its proximity to the Swindon/M4 FEMA, its strategic location on the Bristol-London rail line and proximity to the M4, additional employment growth may be attributed to Chippenham over and above the forecasted requirements within the A350 FEMA set out below.

The 2017 FEMAA states that the A350 corridor Chippenham forms part of has a greater westward focus towards Bath and the West of England. It is a polycentric FEMA of market towns that is very much a corridor with interactions between adjacent settlements. There could also be increased pressure for out-commuting to Bristol/Bath if these areas achieve disproportionate economic success. The employment forecast for the A350/West Wilts FEMA shows job growth of 13,800 in total for 2016-36, with the main growth occurring in manufacturing, construction, business support services, and social care activity and associated services.

This equates to the following B use floor space requirements for 2016-36

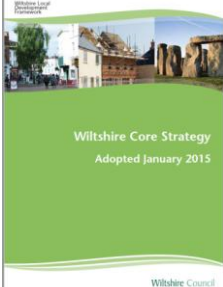
| Use class | Use | Floor space in m2 |
|-----------|----------------------------------------------------------|-------------------|
| B1a | Offices (other than financial and professional services) | 37,620 |
| B1b | Research and development | 32,950 |
| B1c | Industry that can be carried out in a residential area | 8,900 |
| B2 | General industry | 23,720 |
| B8 | Storage and distribution | 4,200 |

The FEMA more specifically forecasts growth in B1 and B8 uses but decline in the B2 general industrial sector although a floorspace requirement remains. The A350 FEMA requirement for 2016-36 is up to 21 ha of new land for office (B1) and 83 ha for industrial (B8). This means delivery of up to 1 ha and 4.2 ha per year respectively at the towns within this FEMA.

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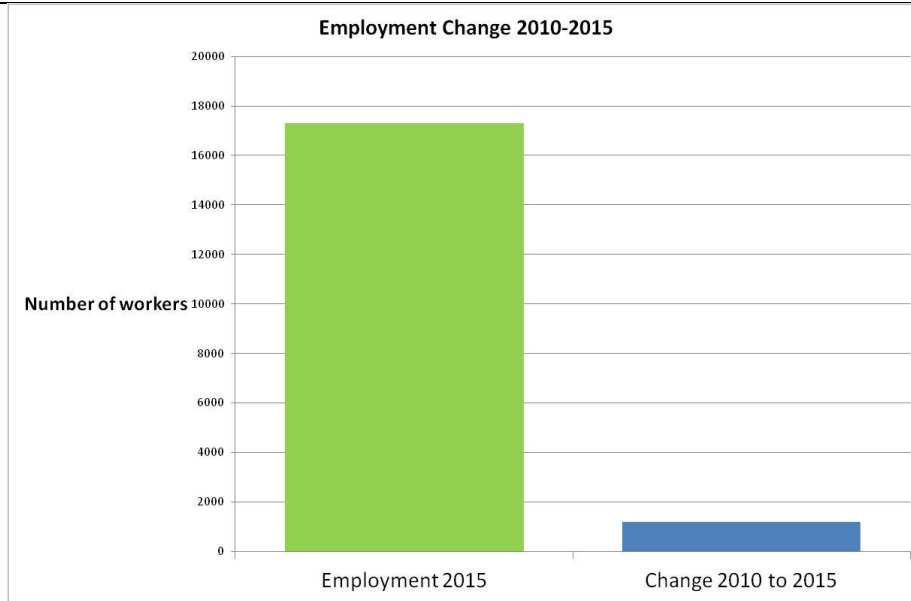
Chippenham

Chippenham is one of the largest towns in Wiltshire and has excellent transport links, being in close proximity to Junction 17 of the M4 and located on the main Bristol to London railway route. It is designated as a Principal Settlement in the WCS.

| | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p>Wiltshire Core Strategy Adopted January 2015</p> <p>Wiltshire Council</p> | <p>The Wiltshire Core Strategy Vision</p> <p><i>“Chippenham’s role as a strategic employment location will have been successful in retaining internationally renowned employers in the manufacturing and service sectors, including ICT, rail systems and logistics, and future development will have been employment led. Job growth will have taken place on existing sites within the urban area, as well as on sustainable edge of town sites.</i></p> <p><i>The town centre will have been improved, with an enhanced mix of retail, leisure and entertainment uses and greater integration with the River Avon, making Chippenham an attractive and popular centre. The River Avon will be a defining and connecting feature and its active riverfront combined with the historic centre, market, parks and open spaces will have provided a thriving artery and distinctive identity for the town.</i></p> <p><i>The self-sufficient status of the town will have been improved, although its excellent transport connectivity will continue to be an asset to the town, making it a popular location for employers. Housing development will have been highly sustainable and balanced, with early delivery of key infrastructure, and key services and facilities in the town will have been improved. Young people will choose to stay to live and work in the town because of the employment opportunities, access to housing and other available facilities.”</i></p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Economy

- Wavin Group – main UK site for a global manufacturer – significant factory investment and site expansion securing 500 jobs
- Siemens acquired Invensys Rail, securing around 800 AEM/rail consulting jobs and creating UK HQ for Rail Automation; redevelopment of Langley Park should help secure technology tenants e.g. semiconductor manufacturer IXYS
- Good Energy’s HQ office continues to expand with future requirement for a new purpose-built permanent HQ office for increased headcount
- Methuen Park and Bumpers Farm largely fully occupied and final plots now coming forward



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 50.7% | 47.1% | -3.6% |

Core Policy 10 identifies 26.5 ha of land for employment development on land adjoining the built up area in addition to what has already been provided or committed at April 2011. Land is allocated in the Chippenham Site Allocations Plan at SW Chippenham (18 ha) and at Rawlings Green (5 ha).

Since 2011, 1.1 ha of employment floorspace has been completed and currently, 7.1 ha of employment floorspace remain permitted but unimplemented. A planning application is pending for land at SW Chippenham.

The Swindon and Wiltshire LEP’s Strategic Economic Plan (SEP) states that Chippenham is situated on the convergence of two growth zones. Chippenham is included in both the Swindon-M4 Growth Zone and the A350 Growth Zone. This location offers the potential to extend growth into the area from both the east and west along the M4 corridor and recognise the development potential at Junction 17.

The A350 Growth Zone has recorded the highest growth in employees amongst all growth zones in 2012-14 (27.4%). The SEP registers the need for transport improvements along the A350 and to Chippenham railway station. The WCS acknowledges that new employment provision in Chippenham is a priority and will help to redress the existing levels of net out-commuting.

Town Centre: Regeneration of the central area of Chippenham is a priority. Details are contained in Core Policy 9 of the WCS which identifies:

- Bath Road Car Park/Bridge Centre Site - to form a retail extension to the town centre to provide a supermarket and comparison units. It is held up by lack of funding and

market conditions.

- Langley Park - to deliver a mixed use site solution for a key redevelopment opportunity area to support the retention of significant business uses on part of the site. Planning permission has been granted.
- In addition, the River Avon Corridor to be enhanced for leisure and recreation uses in an environmentally sensitive manner and developed as an attractive cycle/ pedestrian route. More detailed proposals for sections of the valley are contained in the Chippenham Site Allocations Plan.

A Masterplan (see below) has been developed for all opportunity sites. The Wiltshire College redevelopment is now complete – and sale of former site for use as retirement dwellings is underway. A Station Hub Scheme also features in the Masterplan and includes improved connection over the railway line and regeneration north of the railway line.

The 2017 FEMAA states that there is a net additional sq m floor space requirement of approx. 30,000 for (A1), 980 (A2) and 9,200 (A3-5) at the A350 FEMA for 2016-36.

The Wiltshire Council Retail Review (2015) forecasts approx. 2,000m2 additional convenience goods floorspace capacity in Chippenham by 2026. For comparison goods floorspace, the study identifies a capacity of 11,000 m2 by 2026.

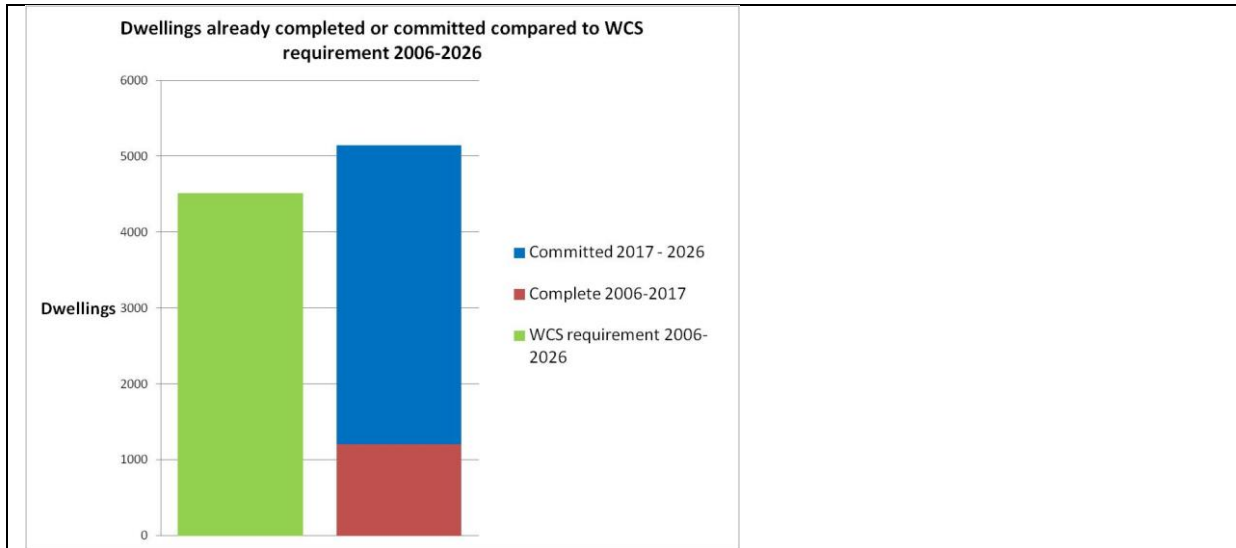
Actual compared to anticipated average rates of house building 2006-2017



Housing

House building has been substantially below anticipated rates. A main reason has been a lack of significant sites to develop. This has been addressed by the Chippenham Site Allocations Plan.

Affordable housing was 21% of all homes built, below target levels. The ratio of house price to earnings rose from 8.6 to 10.2 between 2011 and 2016. The ratio is below the average for settlements in Wiltshire.



Infrastructure

Transport: Measures in the Chippenham Transport Strategy were refreshed alongside preparation of the Chippenham Site Allocations Plan. These include Cocklebury and Northern Link Roads to the A350. Preparation of the Plan also modelled the relative merits of different routes for new roads linking the A4 to the A350 (to the south and east). A traffic study concluded an eastern link road to be the *'key piece of highway infrastructure that is required to unlock the development potential of the town'*. Separate measures also involve further dualling of the A350 and improvements to Junction 17 of the M4. There is good scope for modal shift through improved walking, cycling and public transport.

Schools: Growth would need to involve allocations large enough to provide new primary provision. There is however some capacity and plans for a further secondary expansion at Abbeyfield School.

Water Network: Wessex Water states that assets are predicted to require investment to improve capacity between 2025 – 2036.

Neighbourhood Plan

No Neighbourhood Plan is being prepared for Chippenham Town. Adjoining parishes of Bremhill and Langley Burrell are preparing Neighbourhood Plans to 2026. Amongst other aspects, these aim to safeguard the separate character and identity of villages close to the town and the attractiveness of the countryside that provides both their settlements' visual setting and is a valued local amenity.

Other area designations have been made at Allington & Sheldon (March 2015), Hullavington (September 2016), Kington St Michael (September 2015), Seagry (September 2015) and Sutton Benger (September 2015).

Chippenham Central Area Masterplan (the Chippenham Vision)

The masterplan provides further detail on development guidance set out in WCS Core Policy

9 - 'Chippenham Central Area of Opportunity'.

To encourage coherent regeneration and investment it seeks to:

- Emphasise role as a riverside market town;
- Build on natural assets such as the river and connecting features such as the market, historic centre, parks, eateries and leisure facilities;
- Encourage young people to stay in Chippenham through education facilities, employment choices and access to leisure and housing;
- Strengthen role as a business location, building on its excellent road and rail links.

Chippenham Station Hub

The Chippenham Station Hub scheme includes the potential enhancement of station facilities, including increased car parking, railway crossing provision, commercial development, and public realm improvements. Funding has been secured through the LEP.

Phase 1 is underway and includes access improvements and enhancement of station facilities. Further phases will include increased car parking, access improvements, commercial development, and public realm improvements.

Air Quality

There are no Air Quality Management Areas in Chippenham, however responding to local concerns areas of the town are being monitored.

Constraints

See map.

The overall potential for significant urban regeneration is medium. A corridor of flood risk areas (zones 2 and 3) goes along the River Avon through the town. Land to the south of the town includes a significant area of grade 1 agricultural land. There are relatively few other environmental constraints compared to other settlements. Urban expansion might impinge upon the separate identities and character of smaller settlements around the town, most of which include designated heritage assets. The A350 is considered as a man-made boundary to expansion westward. Current expansion is to the north and south.

Settlement Strategic Issues

Key findings

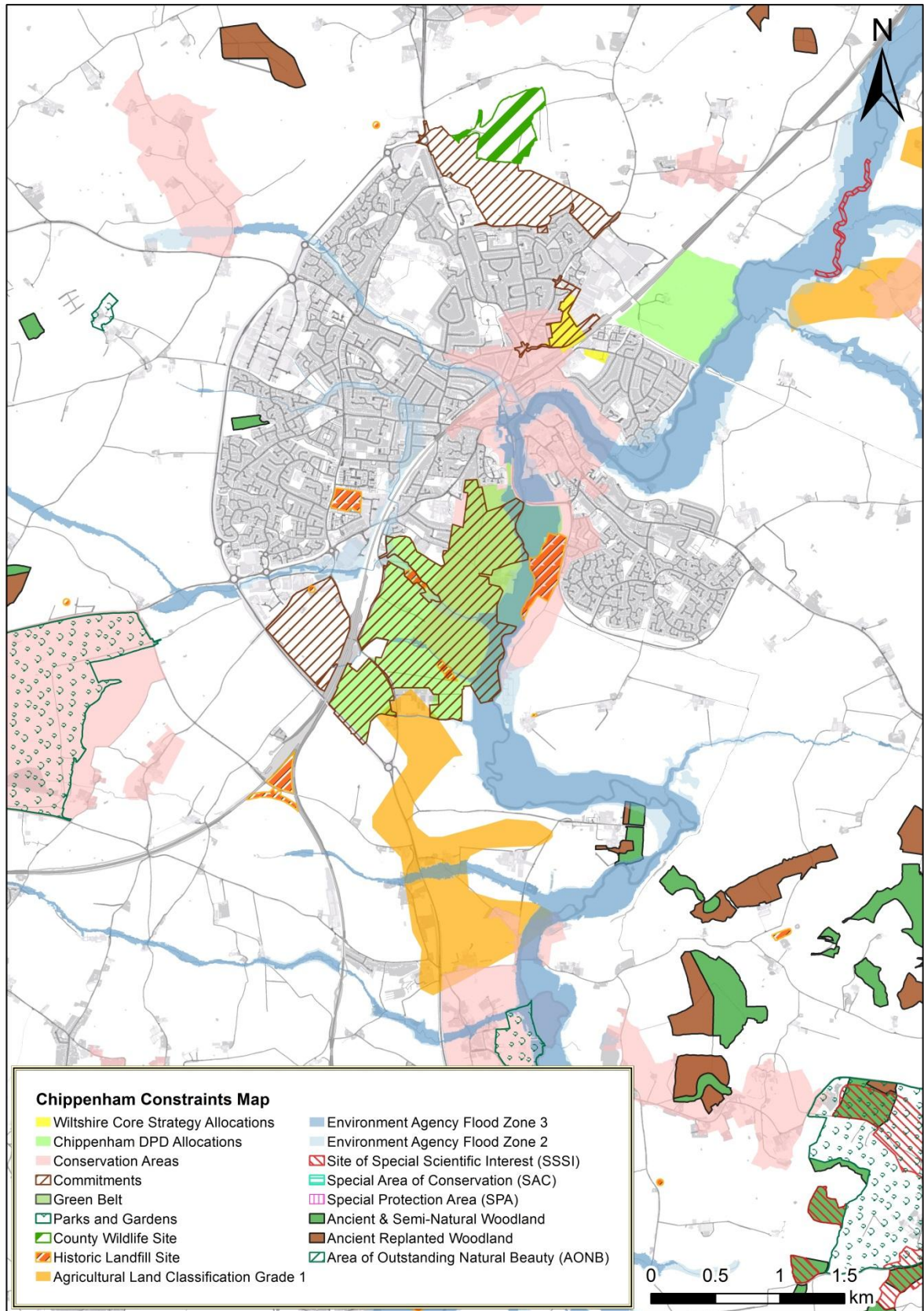
- The town has significant potential for economic growth. A new road linking the A4 to the A350 would help considerably toward realising it.
- Housing development has been well below anticipated rates, largely because there has been no land identified for development for much of the plan period.

- The town is relatively unconstrained compared to other settlements, but urban expansion might threaten the separate identity and character of nearby villages.

Issues

- Should the continued growth of the town be of a scale and location to provide a new road linking the A4 to the A350?
- How can a strategy for the town ensure redevelopment opportunities are maximised?
- How should the town's development relate to the advantages offered by Junction 17 on the M4?

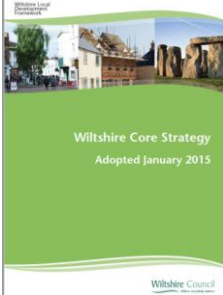
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Calne

Calne provides an important centre for its surrounding rural area, it features many historic buildings. It is designated as a Market Town in the WCS.



Wiltshire Core Strategy
Adopted January 2015

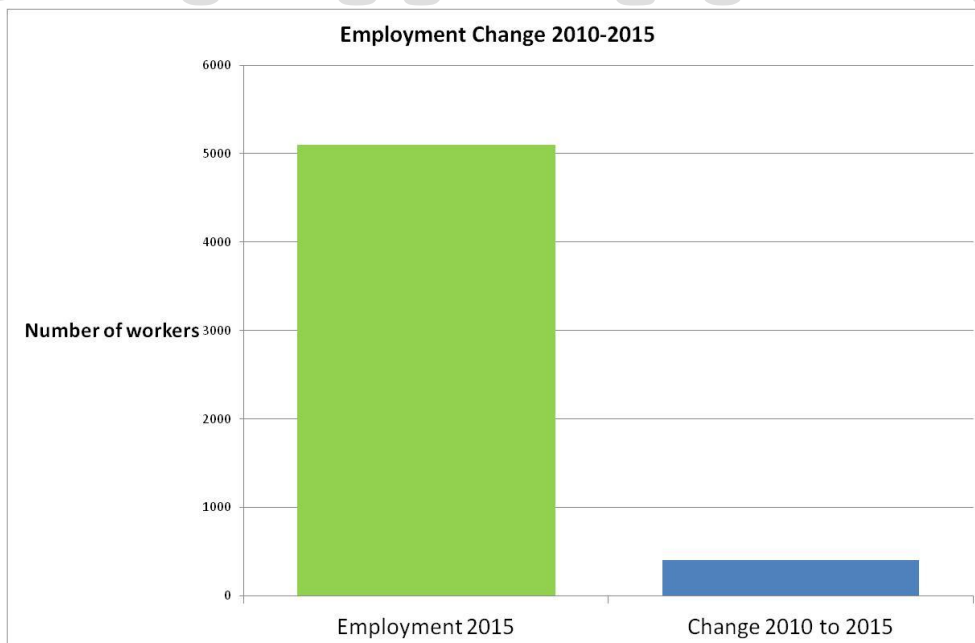
Wiltshire Council

The Wiltshire Core Strategy Vision

“Calne will be an active and attractive centre for the Community Area, offering a range of retail outlets accessible by public transport. The town will have services that are well used, including entertainment and recreational facilities. The community will feel proud of Calne, and will benefit from its range of accommodation and good links with local businesses. Development will have supported the growth of services and community facilities within the town. People within the Community Area will have access to a range of jobs, which will have helped in reducing the present high levels of out-commuting. Progress will have been made towards the restored Wilts and Berks Canal and the River Marden will provide social, environmental and economic assets to the area as part of a wider green infrastructure network linking Calne with Chippenham and the wider countryside.”

Economy

- The Bowood Estate/Hotel/Golf Course complex has become fully established as a leisure/conference facility (around 250 hospitality sector staff)
- Porte Marsh Industrial Estate - re-investment by glazing manufacturer Deceuninck in production capability, securing jobs and reoccupation of secondary premises



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 39.6% | 35.4% | -4.2% |

The WCS allocates a total of 6 ha of employment land including 3.2 ha on land East of Beversbrook Farm and Porte Marsh Industrial Estate.

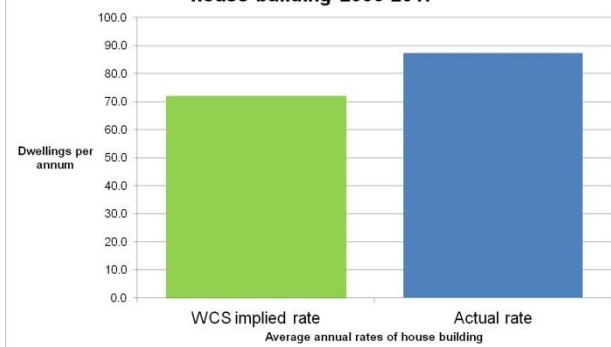
Since 2011, 0.54 ha of employment floor space has been completed at the town and approximately 0.07 hectare of employment floorspace remains committed but unimplemented as of 2017.

The WCS notes that the close proximity of the area to the M4 has attracted key employers to Calne in the past. Close proximity to the M4, Swindon and Chippenham does, however, mean that the town has one of the lowest levels of self-containment in the plan area, which continues to decline, as recorded in the 2011 Census. While Calne falls within the A350 FEMA it is located in its eastern part which may result in a degree of 'overlap' with the Swindon/M4 FEMA to the north east of the town.

Town Centre: The submitted Neighbourhood Plan states that proposals in the 'Town Centre' that create new or enlarged retail units or involve other new development will be expected to contribute to the improvement of the Town Centre's public realm where viable. The plan is permissive of town centre uses provided they do not undermine the vitality or viability of the town centre.

The WCS noted some potential for additional convenience retail. This remained the case according to the Wiltshire Council Retail Review (2015) that suggested there was no capacity for additional comparison goods floorspace and only small capacity for additional convenience goods floor space by 2026 (540 m2 net). Planning permission has been granted for a 2,647 m2 net out of centre Tesco store.

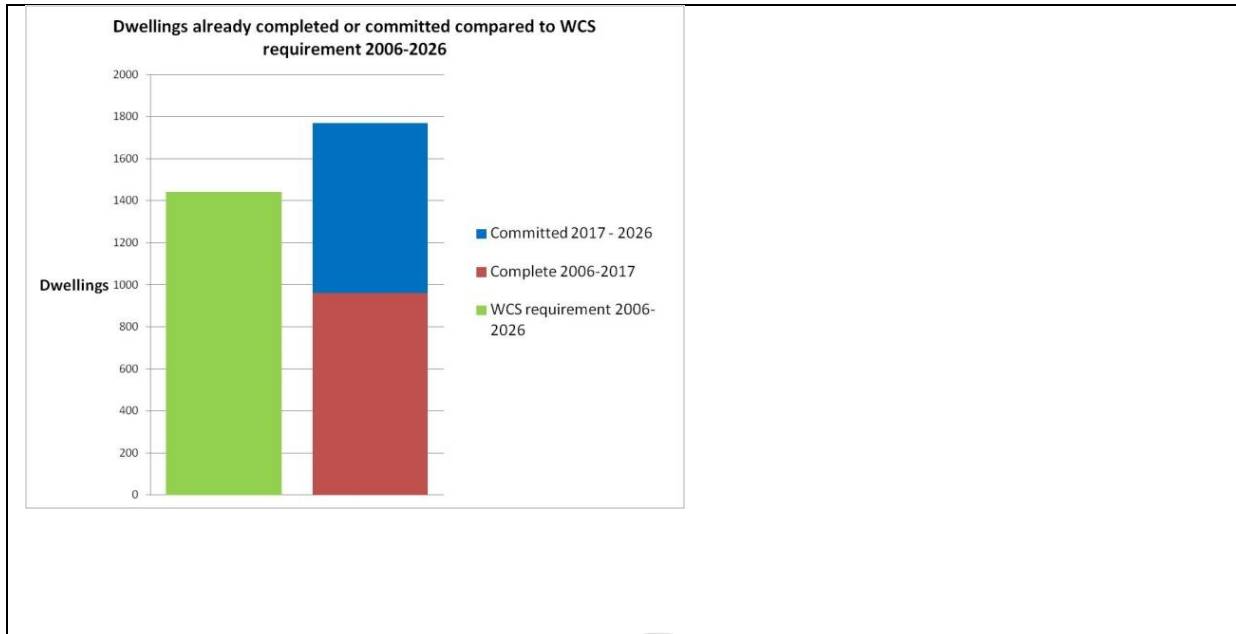
Actual compared to anticipated average rates of house building 2006-2017



Housing

House building has been above anticipated rates. Housing provision is set to exceed requirements in the WCS.

Affordable housing was 27% of all homes built, below target levels. The ratio of house price to earnings rose from 8.0 to 9.6 between 2011 and 2016. The ratio is below the average for settlements in Wiltshire.



Infrastructure

Transport: Traffic congestion detracts from the attractiveness of the town centre and harms air quality (see below). A particular issue arises from the impact of traffic connected to waste facilities on the edge of the town. An eastern distributor road has been suggested as alleviation, but there has been no detailed assessment of its feasibility or how it would relate to the longer term development of the town. Congestion at Curzon Street/Wood Street has also been a long standing issue. While mitigation of this has been discussed over the years a suitable solution is yet to be identified.

Schools: There is some primary capacity for a modest scale of development (100-200 dwellings). Any larger development would require a new primary school. John Bentley Secondary School has the potential to expand if necessary.

Water Network: Wessex Water states that assets are predicted to require investment to improve capacity between 2025 – 2036. There are potentially issues in terms of site capacity and land availability.

Neighbourhood Plan

The Calne Neighbourhood Plan seeks to ensure that future housing development should only be built if it brings infrastructure alongside and does not lag behind it.

Particular importance is placed on developing the of the Town Centre. A Masterplan proposes a number of improvements to promote a night time economy, improve accessibility and increase the number of residential units and potentially provide a new health centre, pharmacy and community services.

The plan contains a housing allocation for 250 dwellings (Land North of Low Lane – planning permission had already been granted on appeal for 130 dwellings on part of this site). A further planning permission has since been granted on the remainder of this site for 165

dwellings.

The plan also contains policies to enhance the green infrastructure network through the allocation of a number of local green spaces.

Air Quality

An Air Quality Management Area (AQMA) covers the A3012, New Road, Curzon Street and part of Oxford Street.

Constraints

See map.

The overall potential for significant urban regeneration is medium. Corridors of flood risk areas (zones 2 and 3) go through the town as well as tributaries north and south of the built up area. No extensive designations about the built up area. Significant features are designated Historic Parks and Garden to the west and an Area of Outstanding Natural Beauty to the east and south,

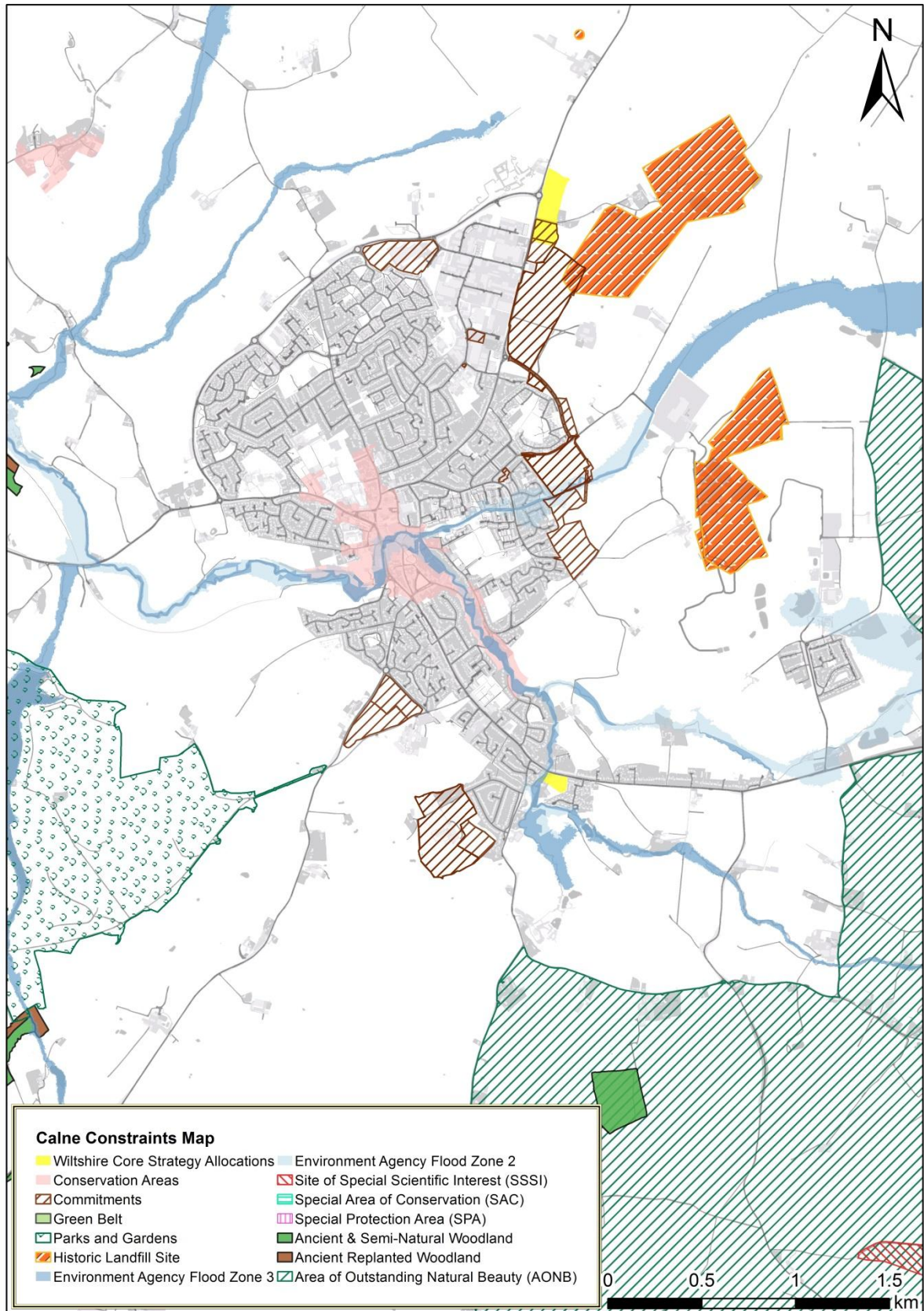
Settlement Strategic Issues

Key findings

- The settlement has a more pronounced dormitory role than others in the HMA
- The town centre is a focus for improvements
- Traffic congestion and air quality are a concern

Issues

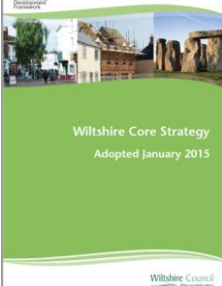
- What should be the future strategy of the settlement? For instance, could higher rates of growth stimulate more investment in the town centre?
- Are there other approaches that could be taken to the town's development that can address traffic issues and improve air quality?



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Corsham

Corsham is characterised by its rural setting, high quality landscape, and historic built environment. It is designated as a Market Town in the WCS.



Wiltshire Core Strategy
Adopted January 2015

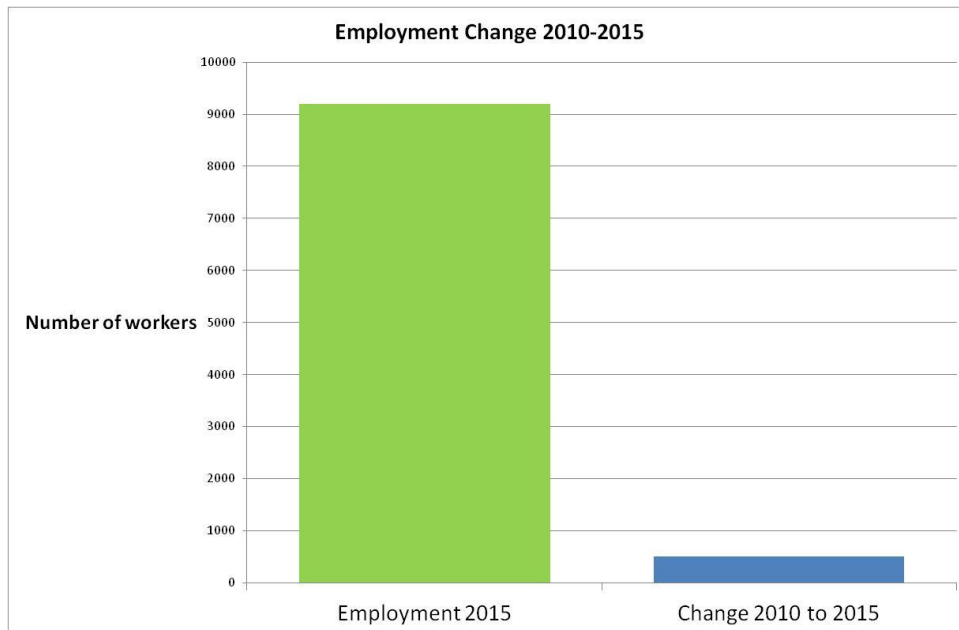
Wiltshire Council

The Wiltshire Core Strategy Vision

“Development within the Community Area will have helped to improve the level of services and facilities in the area and have met local housing need. The unique nature of the villages will have been retained and Corsham will have further established itself as a tourist and employment destination. Redundant MoD sites will have been successfully redeveloped in the most sustainable way and be closely integrated with the wider community following consultation and agreement with the local community. The River Avon will provide a social, environmental and economic asset to the area as part of a wider green infrastructure network linking Corsham with Chippenham, Bath, and the wider countryside.”

Economy

- Digital/Information Communications Technology: ongoing significant investment in the development of Spring Park data centre campus by Ark, and related IT/digital service businesses, linked to communications capacity and the Ministry of Defence presence.
- Corsham Science Park - growth of pharmaceutical manufacturer Bath ASU investing in doubled high quality office/manufacturing footprint and further employment space



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 43.2% | 40.7% | -2.5% |

The WCS allocates 6 ha of new employment land but does not identify specific sites. Since 2011, 2.1 ha of employment floorspace have been completed at the town and approximately 1.5 ha of employment floor space remains committed at the town as of 2017.

The SEP identifies a unique ICT infrastructure built up around Corsham where the Ministry of Defence (MoD) and the private sector have invested heavily in secure communications and data storage. Corsham is home to a growing cluster of digital industries as well as the most secure cloud data centre and electrical supply in the country. There are also strong links with the 100,000 Whole Genome Project and secure Government communications. The SEP however notes the lack of a rail station as a problem.

Town centre: The WCS states that there are opportunities for some additional comparison retail in Corsham to help to more effectively meet the needs of local residents and help reduce trips by car to other destinations. However, scope for any additional convenience retail provision in the town should focus on qualitative improvements and will only be appropriate if a suitably located site is available.

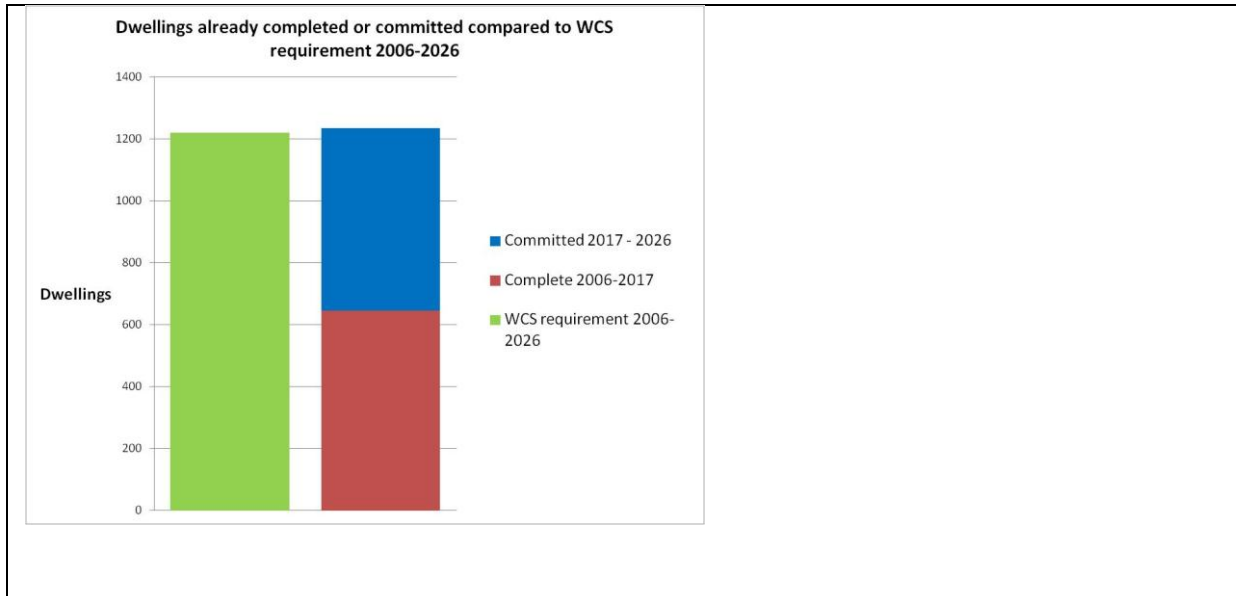
The Wiltshire Council Retail Review (2015) notes a relatively small capacity by 2026 for both comparison and convenience goods floorspace (450 and 540 m2 net respectively).

| Category | Dwellings per annum |
|------------------|---------------------|
| WCS implied rate | 60 |
| Actual rate | 58 |

Housing

House building has been in accordance with anticipated rates. The redevelopment of MoD premises close to the Town has been a sporadic element of land supply.

Affordable housing was 23% of all homes built, below target levels. The ratio of house price to earnings rose from 11.1 to 11.9 between 2011 and 2016. The ratio is above the average for settlements in Wiltshire.



Infrastructure

Transport: The local road network is characterised by rural roads and is generally poor with capacity issues on the A4 and Bradford Road. There is also limited rail and local bus service connectivity. There is limited scope to encourage modal shift, although re-opening Corsham's Railway Station could become more viable with further development.

Schools: New development would need to provide additional primary capacity. All existing primary provision is full and cannot be expanded further. The current expansion of the secondary school caters for current needs. A feasibility study would be required to establish whether further expansion would be possible if it was needed.

Water Network: Wessex Water states that some investment will take place in 2019/20 to improve capacity and there no current plans for further investment.

Neighbourhood Plan

An area designation for the Corsham Neighbourhood Plan was made in February 2016. Early consultation on a draft Plan is anticipated Autumn 2017. Seven key themes have been identified for the town; Housing, Business and Economy, Transport, Heritage, Environment, Health and Wellbeing and Lifelong Learning and there is a desire to ensure that additional housing and employment provision is balanced with the need to retain the existing character and heritage of the area. The Corsham Area Framework (see below) will inform policies and proposals.

Corsham Area Framework

The Framework informs bids for investment and funding by stakeholders and sets out a long-term vision for the area. With regard to the town, the Framework focuses on the Corsham Link, the town centre and West Corsham.

The Framework supports progress on Corsham Link (promoting walking and cycling links)

and the delivery of a new railway station. It contains options for its delivery.

It also outlines guidance on how to remodel the town centre, promote growth south of the railway line and progress the Corsham Link to the Town Centre. It identifies several possible sites for a new hotel to add to the tourism offer of the town.

There is a framework for West Corsham to inform development proposals. The Rudloe Environmental Enhancement project outlines environmental improvements to the area.

Constraints

See map.

The overall potential for significant urban regeneration is low. Significant features are designated Historic Parks and Garden to the east abutting the built up area and an extensive part of an Area of Outstanding Natural Beauty is situated to the west and south of the surrounding area. Safeguards for protected bat species associated with the Bath and Bradford-on-Avon Special Area of Conservation inhibit development on potential greenfield sites around the town. Land west of the built up area is designated as green belt. Urban expansion might impinge upon the separate identities and character of smaller settlements around the town. Previous mine workings are also constraint.

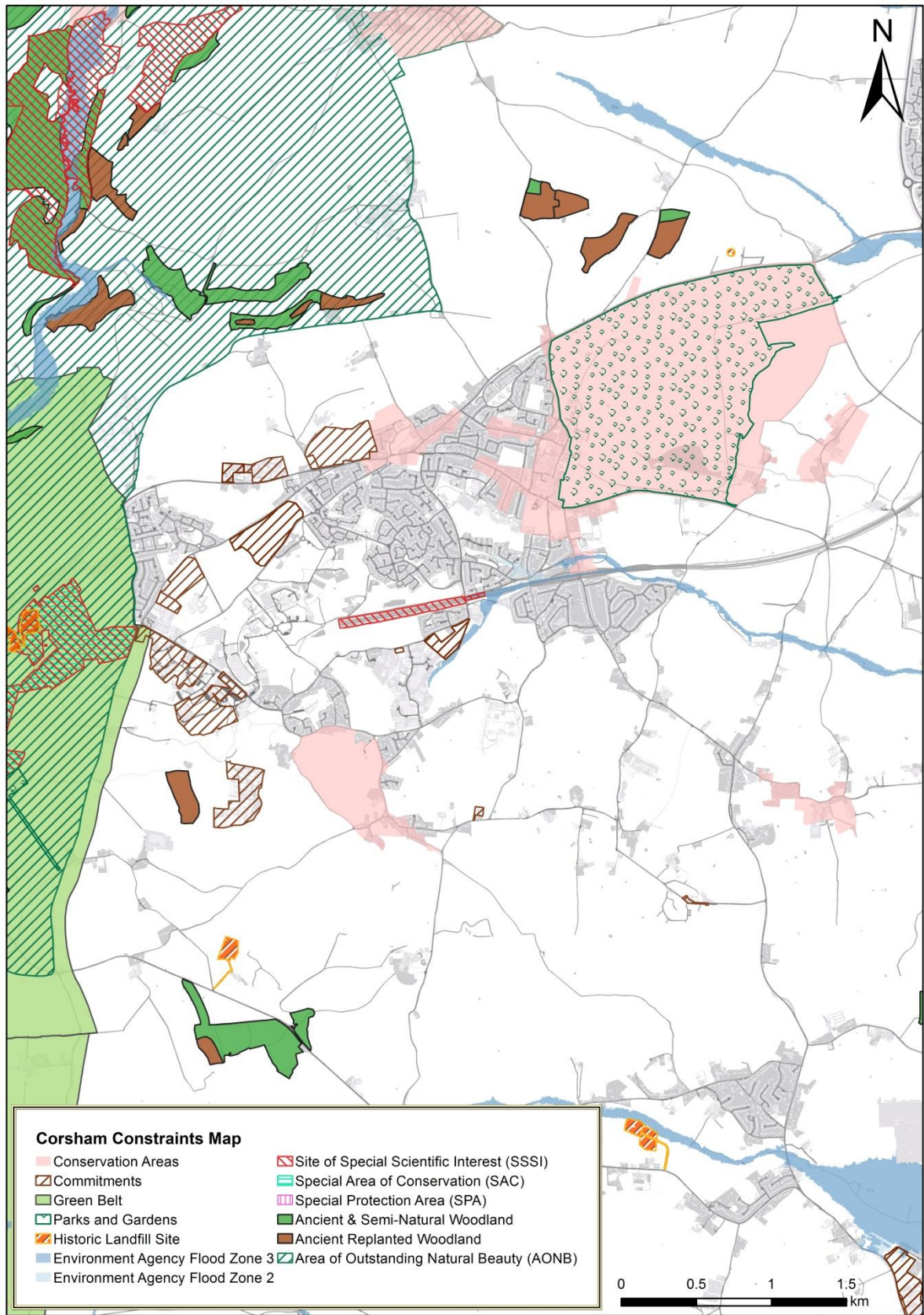
Settlement Strategic Issues

Key findings

- There is a significant ICT Business cluster with further potential to help deliver local economic growth
- Town centre regeneration has the potential to extend the visitor and night time economy as well improve its accessibility
- There is potential to reopen the rail station
- The quality of the local road network is poor

Issues

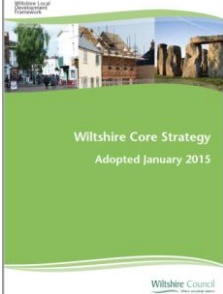
- How can the development of the town capitalise fully on its specialist business cluster?
- Should further growth be geared to support re-opening the rail station?
- What growth might attract more investment in the town centre?



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Devizes

Devizes is one of the largest market towns in the County, located on the crossroads of the A361 and A342, which serve as important links to Chippenham, Swindon and the M4. The town has historically been the focus for development within east Wiltshire and has a large and varied employment base. It is designated as a Market Town in the WCS.



Wiltshire Core Strategy
Adopted January 2015

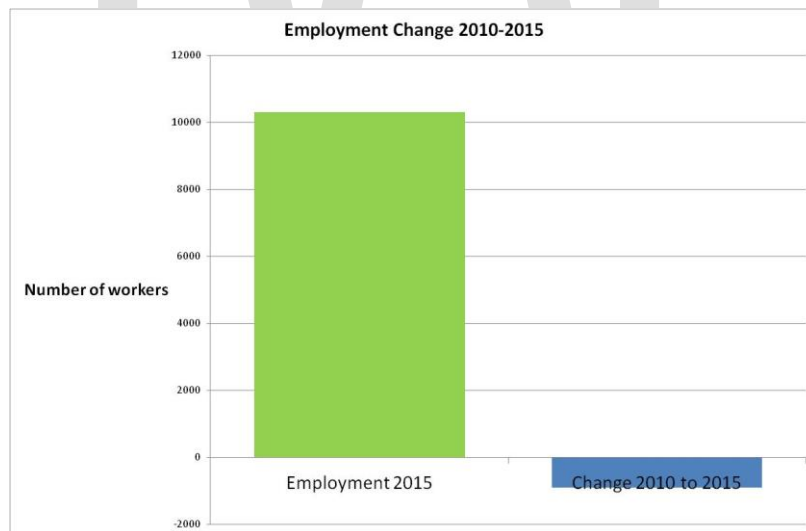
Wiltshire Council

The Wiltshire Core Strategy Vision

“Devizes will have a strengthened service centre role for employment, retail and community services within the Community Area and east Wiltshire. New residential, employment and retail development will have been delivered to support the town’s high level of self containment. Additional housing will have been provided to help meet the needs of local people. The resilience of the town will have been reinforced by strengthening its small business economy and development will have had regard to capacity constraints within the town’s road network and air quality. The Kennet and Avon Canal will continue to act as a vital social, environmental and economic asset to the area as part of a wider green infrastructure network linking Devizes, Trowbridge, Bradford on Avon, Bath and the wider countryside.”

Economy

- A number of major employers have made investments over the past decade, including AEMs: Latchways (expansion of UK HQ), Cross Manufacturing, and Ball Aerocan (production); and Haydens Bakery (ongoing expansion).
- Wadworth Visitor Centre has added to the tourism offer.



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 55.2% | 53.8% | -1.4% |

The WCS allocates 9.9 ha of new employment land over the plan period at:

- Land between A361 and Horton Road 8.4 ha
- Nursted Road 1.5 ha

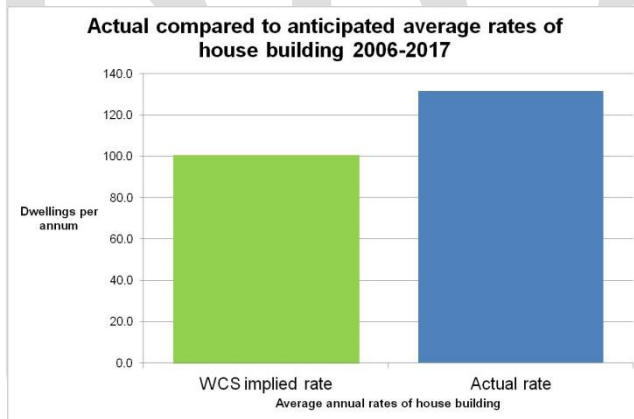
The main employment allocation has not yet come forward. No developer has initiated development.

Since 2011, 0.45 ha of employment floor space have been completed and as of 2017 no employment floorspace remains committed.

Town centre: The Wiltshire Council Retail Review (2015) notes that there is demand for additional comparison goods floorspace of approximately 1,500m² by 2026, with demand occurring mainly after 2024. There is a very small capacity for additional convenience goods floorspace as of 2026 (300m²).

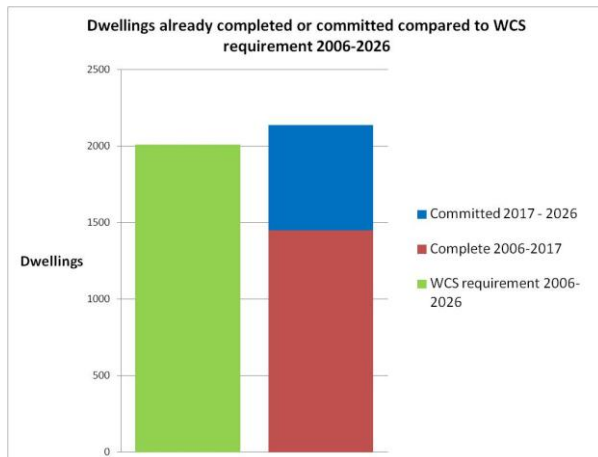
Proposals for modern format retail units need to integrate into the existing fabric and street pattern of the town centre in order to respect its historic character.

Housing



House building has been above anticipated rates when the WCS envisaged a reduction from earlier trends.

Affordable housing was 31% of all homes built, below target levels. The ratio of house price to earnings stayed the same from 2011 to 2016 at 9.4. The ratio is below the average for settlements in Wiltshire. Everywhere else the ratio worsened. There are local concerns that there are sufficient affordable homes available to support the local economy.



Infrastructure

Transport: Traffic congestion is an issue, with air quality having become a major concern. There is a longer term aspiration to secure a railway station to serve the town. Locations at Lavington or Lydeaway have been suggested. The Devizes Air Quality and Transport Group

is promoting the implementation of the transport plan which has improved cycling and walking infrastructure and committed funds to junction improvements in order to address air quality 'hot spots'.

Schools: There is a small amount of capacity at both primary and secondary levels. Significant new development would need to provide additional primary capacity

Water Network: Wessex Water states that assets are predicted to require investment between 2025 – 2036 in order to improve capacity

Neighbourhood Plan

The vision for the Devizes Neighbourhood Plan (2015) states that “Devizes should grow in a manner which enables its residents to live a sustainable lifestyle, with a reduced need to travel; where there is a provision for easy access to open space and the public realm and the scale and ambiance of the built environment promotes wellbeing.”

The Plan identifies 15 sites around the town capable of accommodating approximately 140 dwellings.

The Plan highlights how population growth has not been matched by infrastructure improvements, such as in transport. Stress on the local infrastructure is therefore a significant concern. In particular, it describes how local roads have not been upgraded to cope with traffic increases created by local development and the growth of traffic.

Air Quality

An Air Quality Management Area (AQMA) covers the area around Shanes Castle. Other points along the A361 through Devizes are also being monitored.

Constraints

See map.

The overall potential for significant urban regeneration is medium. An extensive part of an Area of Outstanding Natural Beauty is situated immediately to the north of the town and eastwards in the surrounding area. The immediate area around the town includes significant areas of grade 1 agricultural land.

Settlement Strategic Issues

Key findings

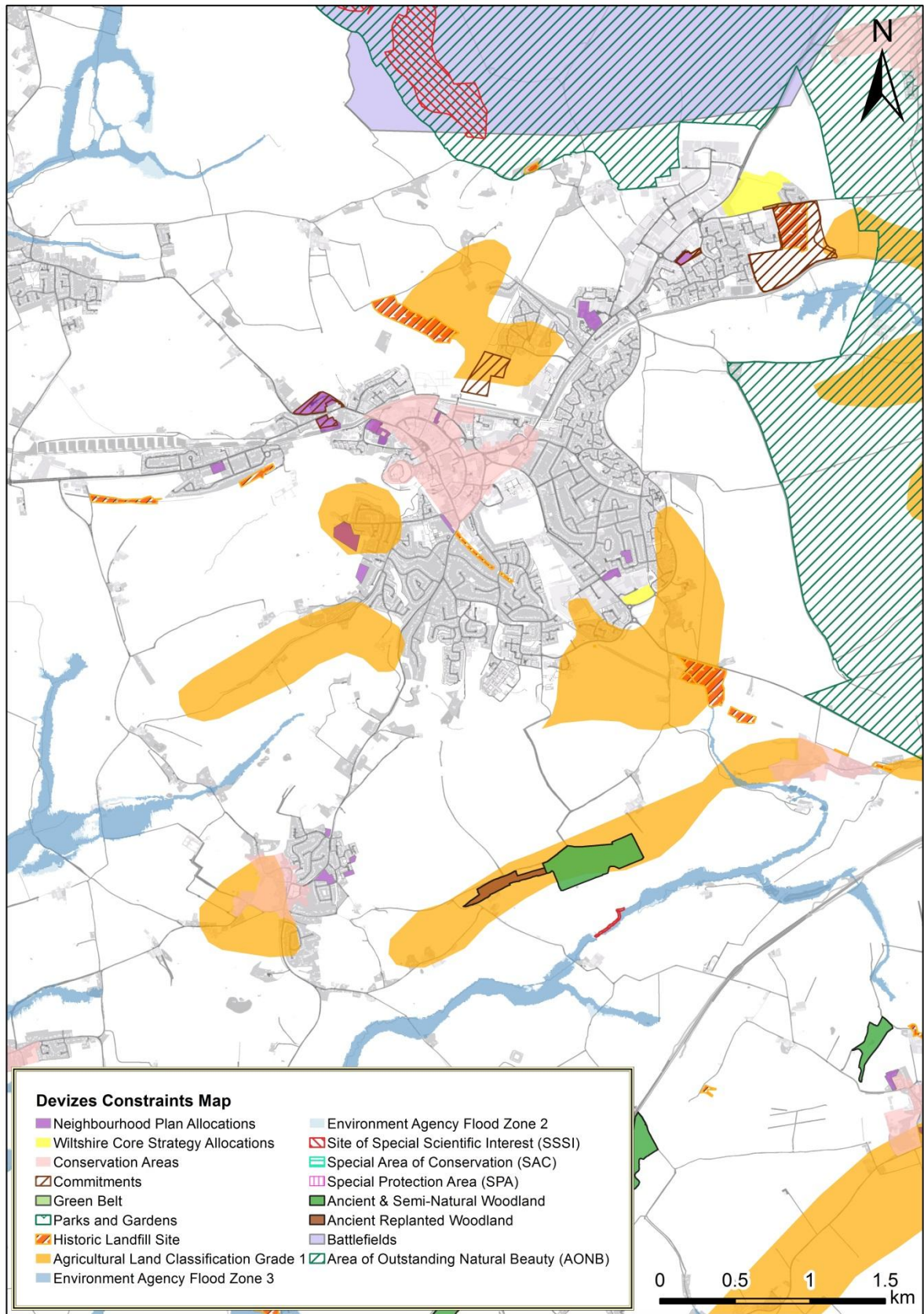
- Employment has declined and the larger WCS allocation of employment development has not yet been developed
- Traffic congestion and air quality are important concerns

Issues

- What should be the future strategy of the settlement? Should it prioritise measures to support more affordable homes and stimulate greater economic development?

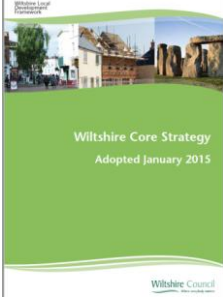
Are there other approaches to the town's development that can address traffic issues and improve air quality?

DRAFT



Malmesbury

The hill top town of Malmesbury is almost surrounded by the River Avon and contains an historic core which includes Malmesbury Abbey, Town Walls and Market Cross. It has an important role as a tourist destination. There is a small employment base in the town which is dominated by a single manufacturer. It is designated as a Market Town in the WCS.



Wiltshire Core Strategy
Adopted January 2015

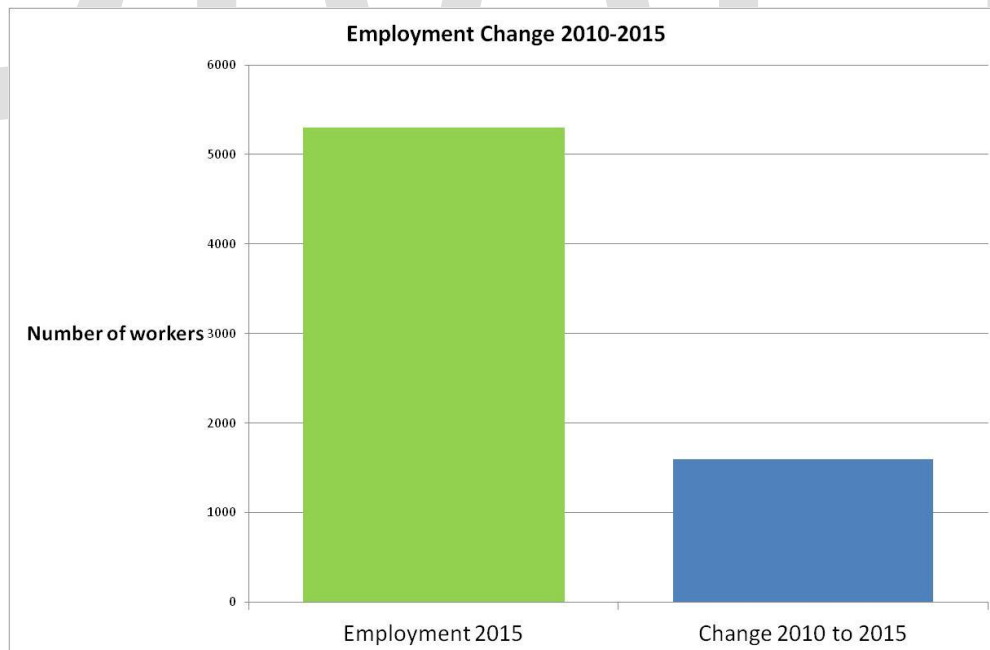
Wiltshire Council

The Wiltshire Core Strategy Vision

“Development within the Malmesbury Community Area will have reflected and respected its high quality built and natural environment. The River Avon will be a social, environmental and economic asset to the area as part of a wider green infrastructure network linking Malmesbury with the wider countryside. The Cotswold Water Park will provide a recreational resource for local communities and visitors to the area. The town of Malmesbury will continue to serve as an important service and employment centre for the Community Area. New development will have helped to meet local needs, while Malmesbury will have also widened its employment offer.”

Economy

- Dyson: significant expansion of its global HQ and research and development campus, doubling workforce with high-value engineering/professional roles



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 46.9% | 40.6% | -6.4% |

The WCS allocates 5 ha of new employment land over the plan period, including:

- Land North of Tetbury Hill 1 ha for which planning permission was granted in 2014
- Land at Garden Centre, Malmesbury 4 ha

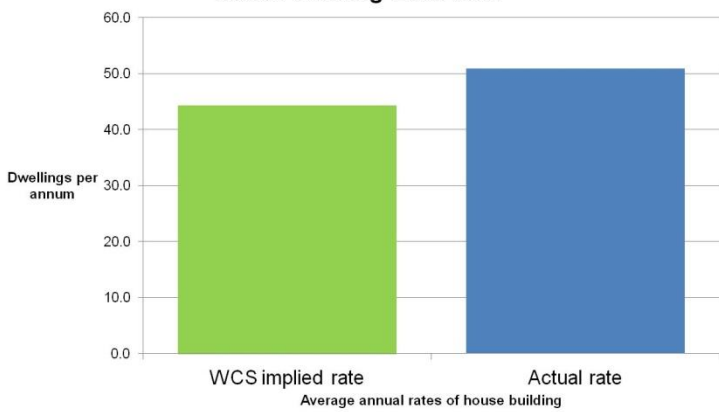
Since 2011, aside from the expansion of Dysons, Malmesbury has seen a negligible amount of employment floor space completed and as of 2017, 1.0 ha of employment floorspace remains committed, which is the expansion to the Dyson factory at Tetbury Hill.

There is a small employment base in the town which is dominated by a single manufacturer, yet overall there is a pattern of net in-commuting to the town. Dyson has experienced significant expansion.

The town’s proximity to the M4 and the A429 is described as a real asset and should provide the impetus required for attracting increased employment growth. Malmesbury is also close to the Cotswold Water Park, which is an important tourist destination, and the former RAF Kemble (located on the border with Cotswold District Council and now called Kemble Business Park), which has developed into a business park.

Town centre: A new large foodstore has opened on the edge of the centre. According to the Wiltshire Council Retail Review (2015), there is no capacity for additional convenience goods floorspace at the town and limited comparison goods floor space capacity (approx. 700m2 by 2026).

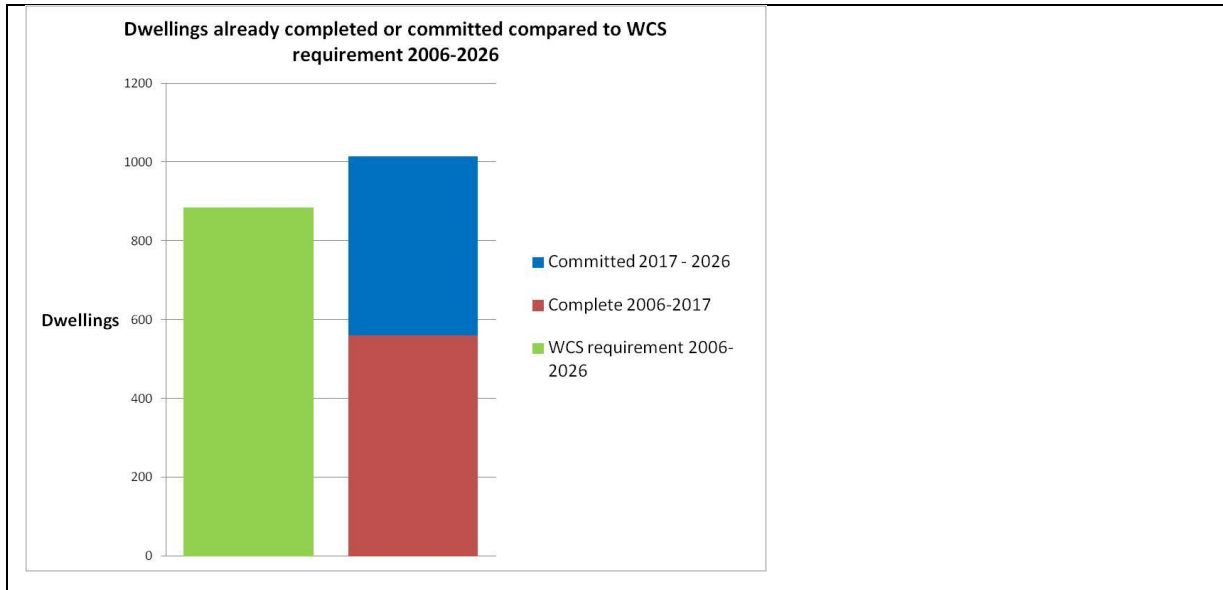
Actual compared to anticipated average rates of house building 2006-2017



Housing

House building has been slightly higher than anticipated rates.

Affordable housing was 17% of all homes built, well below target levels. The ratio of house price to earnings rose from 11.2 to 11.9 between 2011 and 2016. The ratio is above the average for settlements in Wiltshire.



Infrastructure

Transport: Currently few traffic problems compared to other settlements. Junction improvements have been carried out in connection to expansion of Dyson’s HQ. Limited capacity to mitigate trips through public transport, walking or cycling.

Schools: Primary provision could be expanded if justified by sufficient significant further development. Land is available at the secondary school should it be necessary to expand it.

Water Network: Wessex Water states that assets are predicted to require investment to improve capacity between 2025 – 2036

Neighbourhood Plan

The Malmesbury Neighbourhood Plan was made in February 2015. It aims to consolidate the housing growth including proposals to allow for the expansion of Dyson’s HQ and encourage other new business, looking for town centre services and shops to capitalise on the construction of a new foodstore (now delivered). It includes proposals for new homes aiming to provide a better mix of dwelling types, business units and expansion of the primary school.

Constraints

See map.

The overall potential for significant urban regeneration is low. Corridors of flood risk areas (zones 2 and 3) go around the core the town. Malmesbury Abbey is a designated heritage asset on the town’s hill top within an extensive conservation area. Its setting is a significant contribution to its value. An Area of Outstanding Natural Beauty abuts the eastern side of the town.

Settlement Strategic Issues

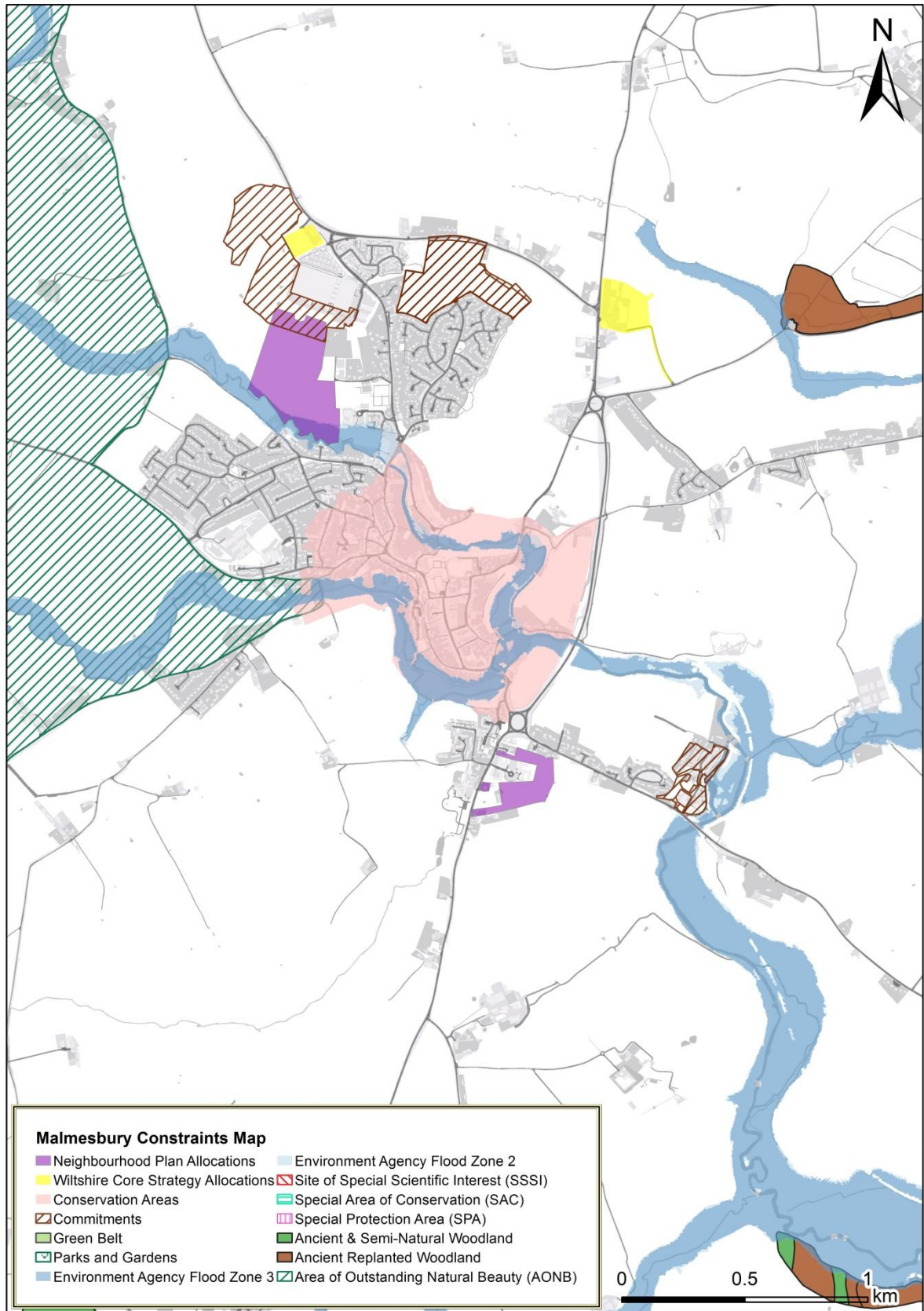
Key findings

- The town has attracted significant inward investment but continues to rely heavily on a single employer
- There has however been a significant decrease in self-containment, even though there is net in-commuting.
- There are several significant environmental constraints (heritage, landscape and flooding)

Issues

- What should be the future strategy of the settlement? Are there approaches to the town's development that could help diversify the local economy?

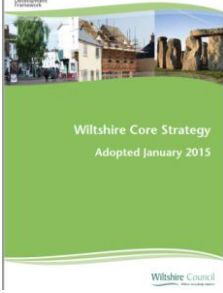
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Melksham

Melksham has strong links by road with the larger centres of Trowbridge and Chippenham and the A350 runs through the town from north to south. There are a large number of historic buildings within Melksham, but the town centre is in need of regeneration and its retail offer has suffered for a number of years. It is designated as a Market Town in the WCS.



Wiltshire Core Strategy
Adopted January 2015

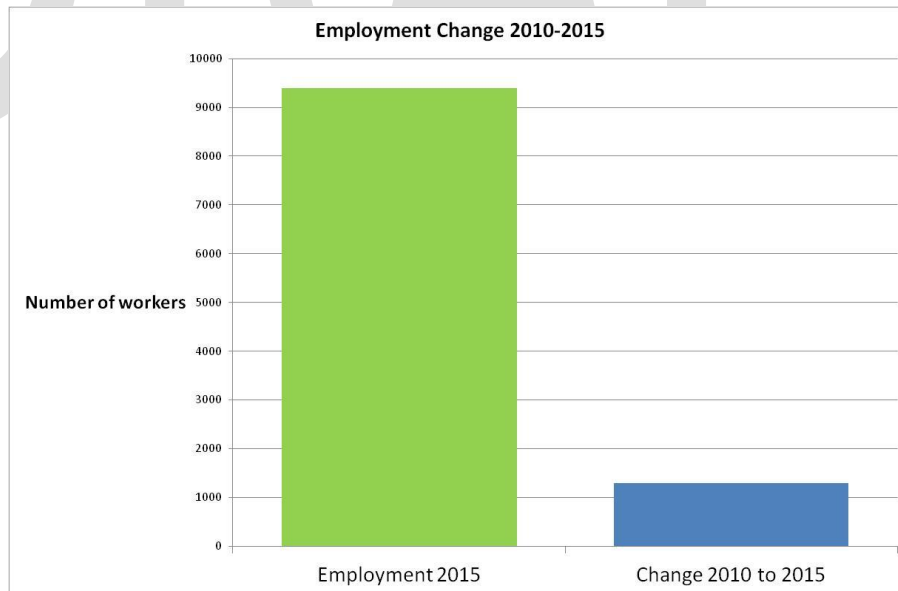
Wiltshire Council

The Wiltshire Core Strategy Vision

“Melksham will be a thriving and accessible market town that respects its heritage and rural environment, whilst welcoming the expansion of local inward investment from new high quality businesses. The town’s employment base will have been strengthened, helping to improve its economic self-containment. Inward investment will also help support regeneration ambitions for the town centre, taking full advantage of its canal and riverside location. The River Avon, Kennet and Avon Canal and the restored Wilts and Berks Canal will provide social, environmental and economic assets to the area as part of a sustainably used green infrastructure network.”

Economy

- Furniture manufacturer Herman Miller consolidated UK manufacturing operations from Bath and Chippenham to a purpose built 100k sq ft facility (200 jobs).
- Cooper Tires (automotive) remain the largest employer (700 jobs)



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 45.9% | 41.1% | -4.8% |

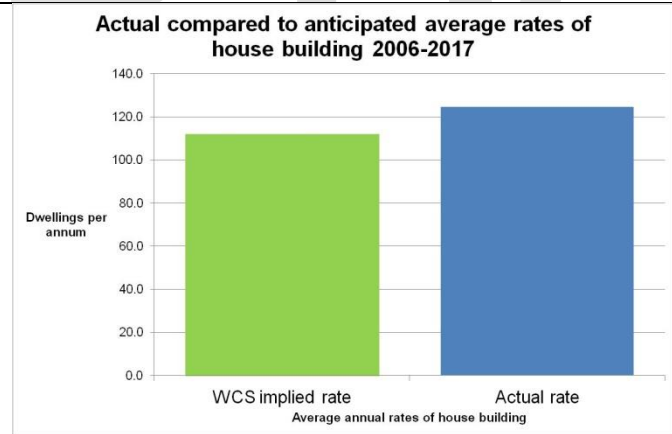
The WCS allocates 5 ha of new employment land over the plan period at Hampton Business Park. The WCS also states that the regeneration of Bowerhill Industrial Estate remains a priority.

There are a number of brownfield sites in the town which provide good regeneration opportunities. The regeneration and improvement of existing employment sites, such as the Bowerhill Industrial Estate, remains a priority.

Since 2011, 2.5 ha of new employment floor space have been completed and there is 0.3 ha of B-use floor space permitted but unimplemented. Permissions are relatively small scale.

Melksham is close to and easily accessed from Trowbridge, Chippenham and Bath and is only eleven miles from the M4. Initial analysis of the population statistics indicates that there is capacity within the labour market to accommodate future growth. Melksham allows occupiers to benefit from being located in close proximity to these settlements without being subject to the higher rents charged for employment property in these other locations.

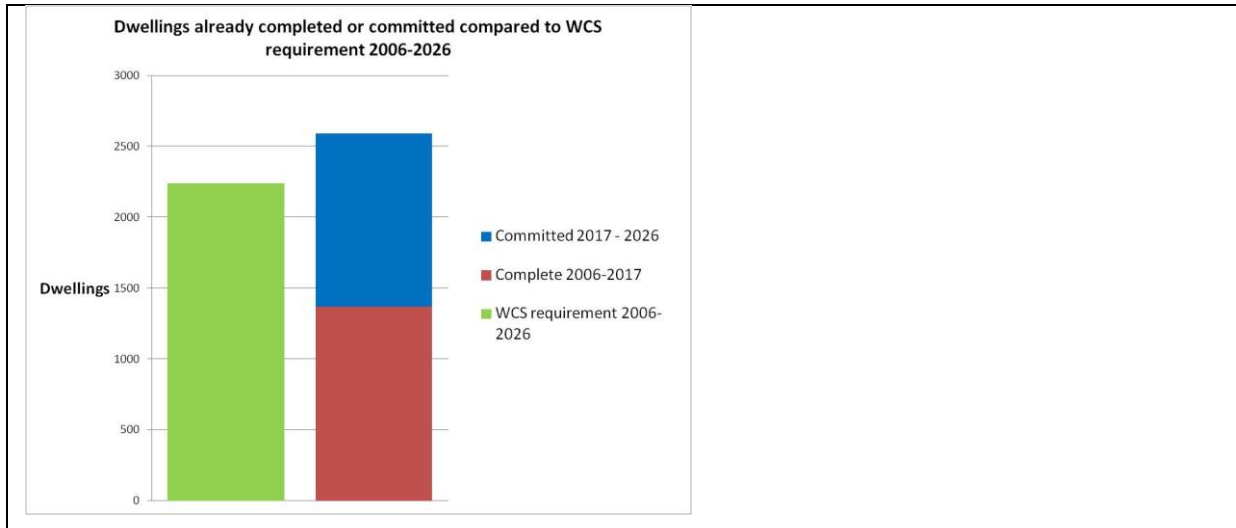
Town centre: The WCS states that there is limited scope for any further convenience retail provision in the town. However, there is some potential for expansion of comparison retailing, which should be focused in the central area of the town to support town centre regeneration. This is confirmed in the Wiltshire Council Retail Review (2015) which states in line with the findings of the 2011 Retail Study, there remains an over-provision of convenience goods floor space in Melksham, following the introduction of the ASDA store (- 2,492sq m net by 2026). There has also been a reduction in the amount of comparison goods floor space capacity, which is now relatively modest in the medium to longer term (850sq m net by 2026) and not felt sufficient to prompt the allocation of land for new development.



Housing

House building has been slightly above anticipated rates. Substantial commitments for housing, focussed around the east, have improved local road and other infrastructure.

Affordable housing was 44% of all homes built, above target levels. The ratio of house price to earnings rose from 8.6 to 9.3 between 2011 and 2016. The ratio is below the average for settlements in Wiltshire.



Infrastructure

Transport: Increased congestion and delays on A350 at Melksham increases journey times between key settlements in the corridor (i.e. Chippenham, Melksham Trowbridge, Westbury, Warminster) and makes longer distance north south journeys more difficult, impacting on business / freight transport costs and commuting. A study is considering the feasibility of a by-pass for the town. The TransWilts rail service will increase to 2 car trains in 2018 and usage is expected to continue to rise. Melksham station will undergo a platform extension in 2018 to facilitate the larger trains and a Masterplan for further station and access improvements has been commissioned.

Schools: New development would need to provide additional primary capacity. Melksham Oak Secondary School is to be expanded to cater for existing demand and could possibly expand again by a small amount but has limited further development potential.

Water Network: Wessex Water states that assets are predicted to require investment & capacity between 2025 – 2036. There are potentially issues in terms of site capacity and land availability.

Neighbourhood Plan

An area designation for Melksham Neighbourhood Plan was made in July 2014. It covers the area of Melksham Town and Melksham Without parish. The steering group are considering allocating housing sites that will have significant community benefits, providing infrastructure and facilities that will have long-term benefits, whilst helping to regenerate the town centre and protect the remaining open land between Melksham and Bowerhill.

The provision of additional employment land is also being considered, as is the potential allocation of land for healthcare purposes that will complement the new Wiltshire Air Ambulance Headquarters to the south of Melksham.

Work involves realising opportunities from the proposed Melksham canal link through green infrastructure provision, transport links, regeneration and tourism.

Constraints

See map.

The overall potential for significant urban regeneration is medium. A wide corridor of flood risk areas (zones 2 and 3) goes through the town as well as a tributary to the east. Land to the south-west of the town includes a significant area of grade 1 agricultural land. A route is safeguarded for the future restoration of a Wilts and Berks canal link from Semington to the River Avon.

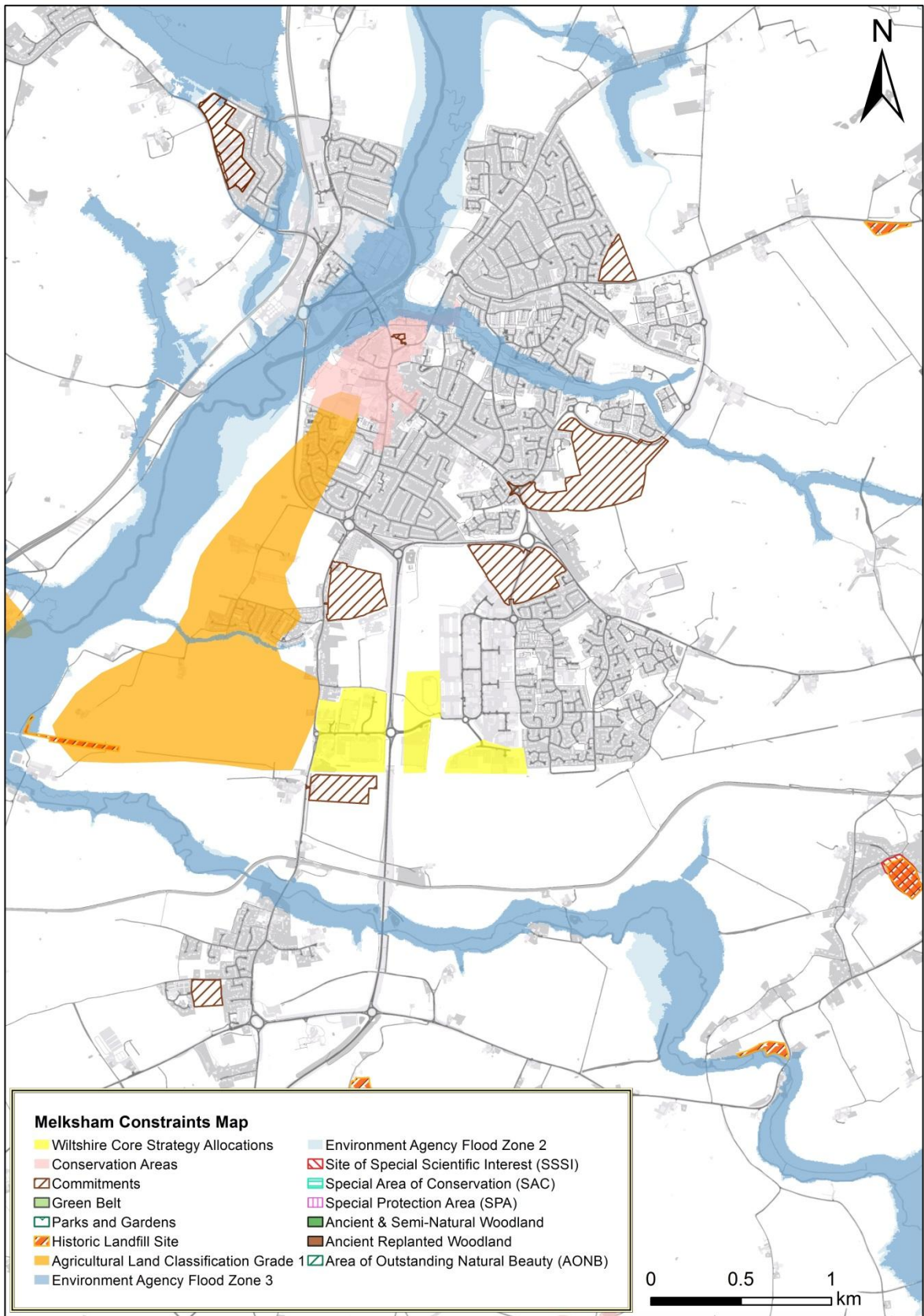
Settlement Strategic Issues

Key findings

- There are several potential regeneration opportunities in the town.
- Levels and rates of housing and employment development have been slightly higher than those anticipated in the WCS and been accompanied by infrastructure investment.

Issues

- How should town centre regeneration opportunities be realised?
- Should the current strategy for the town be continued or should there be a different approach? What contribution could the restoration of the canal make to the town's future?



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Chippenham Housing Market Area – Strategic Issues

Settlements in the Chippenham HMA would face pressures for a marked increase in rates of growth over the period 2016 - 2036. This signals a substantial change in Chippenham's growth where there are already substantial commitments after a sustained period of slow rates of house building and a lack of land for employment development.

Studies suggest growth at some settlements might need to be underpinned by substantial infrastructure investment. This is against a background of concern in many communities that their local infrastructure has not kept pace with growth that has already taken place. Particular concerns involve traffic on local road networks.

Strategic issues for the HMA at this stage are:

- The SHMA suggests an increase in housing needs. Do settlements in the HMA have the potential for economic development to support balanced growth? If not and it is then decided that not all the suggested housing need should be met in the HMA, where else should the remainder be met?
- Are some settlements much more constrained? Are some settlements more suited to growth than others? If so, which ones would be and why?
- Is there scope to bring about more re-use of brownfield sites to limit the loss of greenfield land? If so, how could this be realised?
- What would be the effect on commuting patterns of higher rates of house building? Looking to 2036, what should be the key investments in transport?

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Appendix 1: Part 3

Salisbury Housing Market Area

**Individual Settlement and Housing Market Area
Profile**

Committee Draft

October 2017

Introduction

This document is one of four Housing Market Area Profiles which have been prepared to inform the Swindon and Wiltshire Joint Spatial Framework: Issues Paper. It provides an assessment of the main settlements in the Salisbury Housing Market Area and the strategic issues they face. This is a first step to understanding the opportunities and constraints of growth before considering how each place could develop sustainably; whether its role continues as currently planned or how it should change.

In combination with profiles for the Chippenham, Swindon and Trowbridge Housing Market Areas, this better understanding of our main settlements can inform the assessment of whether and how the housing and employment needs in each market area can be met.

The profiles contained in this document draw on existing published data sources such as the current understanding of the role and function of each main settlement, the 2011 Census, the Council's own monitoring reports and other local area documents such as neighbourhood plans.

Each profile presents a snapshot assessment of progress with the current strategy included in the Wiltshire Core Strategy, a picture of environmental constraints, the local community's vision (where there is neighbourhood plan) and the position from providers of underlying infrastructure (transport, water and education) which is essential to every settlement but which has the potential to also be a significant barrier to further growth.

The main findings for each settlement are summarised below followed by a set of issues specific to each settlement. These identify where the current development plan strategy may need to change. They are phrased as questions because the vital part of this stage in the Local Plan review is to invite community and stakeholder input on how the current strategy should change; what issues it should address and how future needs can be met by sustainable development.

Salisbury Housing Market Area

The Salisbury Housing Market Area encompasses the area around the principal settlement of Salisbury and the market towns of Amesbury, Tidworth and Ludgershall.



The 2017 SHMA places the city within the centre of Salisbury Housing Market Area (HMA). The study identifies the need for housing in this market area over the period 2016-2036 to be 8250 dwellings. This would represent a reduction on the WCS period 2006-2026. The FEMAA notes a potential shortfall of labour within the Salisbury HMA.

The Salisbury/Amesbury/A303 FEMA represents a corridor with links toward Southampton and into the south-east. The scientific, research and development sector is particularly important in this location. Manufacturing is far less important in this FEMA, accounting for only 5% of total employment. Public services are more important in this area, with 29% of employment in public administration, defence, education, health and residential & social care.

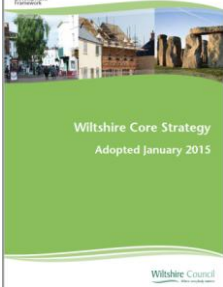
The 2017 FEMAA forecasts 11,400 jobs for 2016-36 with the main growth occurring in Financial and Business Services, Public Administration and Defence, and Education and Health. Manufacturing is set to decline. In terms of B-use floor space, the study forecasts for 2016-36:

| Use class | Use | Growth in floor space (in m2) |
|-----------|----------------------------------------------------------|-------------------------------|
| B1a | Offices (other than financial and professional services) | 45,880 |
| B1b | Research and development | 89,500 |
| B1c | Industry that can be carried out in a residential area | 2,600 |
| B2 | General industry | -35,050 |
| B8 | Storage and distribution | 3,250 |

Taking into account churn, re-use of employment sites and accounting for additional land requirements, the FEMAA forecasts a total of up to 15.6 ha for office space, and 45 ha for industrial. This equates to up to 0.8 ha and 2.2 ha annually respectively for the entire Salisbury/Amesbury/A303 FEMA.

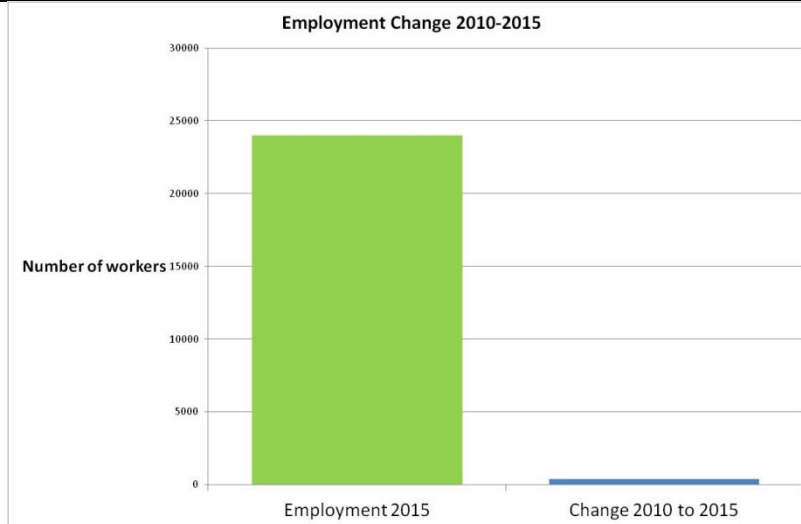
Salisbury

The city is the main centre of south Wiltshire, acting as a focal point for a wide rural catchment with its influence stretching into parts of Hampshire and Dorset. Salisbury Cathedral and the city's proximity to Stonehenge make Salisbury an international tourist destination and this brings significant revenue to the city. It is designated as a Principal Settlement in the WCS.

| | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p>Wiltshire Core Strategy Adopted January 2015</p> <p>Wiltshire Council</p> | <p>The Wiltshire Core Strategy Vision</p> <p><i>“Salisbury will have developed its historic role as a thriving and prosperous city that is self-contained providing the necessary range of homes to support this role and offering a range of employment, retail, cultural and leisure facilities to a wide hinterland, stretching into Hampshire and Dorset. Its own distinct character will have been retained and enhanced through the successful implementation of the Salisbury Vision including schemes such as the market place enhancement.</i></p> <p><i>Salisbury’s tourism role will have been enhanced and there will be a lively café culture around the enhanced market square, along with improved leisure, arts and theatre facilities. Partnership working with the cathedral authorities and English Heritage at Stonehenge on implementation of their respective management plans will have greatly enhanced Salisbury’s reputation as a major international tourist destination.</i></p> <p><i>The retail, leisure and cultural function of the city will have been greatly enhanced by the successful redevelopment of the Maltings/Central Car Park that is well integrated into the city centre, bringing benefits for the whole area. Significant growth in new homes and jobs will have been successfully integrated into the city in a manner that meets local needs. The highly valued views of the Salisbury roofscape and spire views will have been retained. The new homes, balanced with the economic opportunities, will have provided local opportunities to work and live in the local area and will have successfully reduced the amount of out-commuting.”</i></p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Economy

- A presence of financial/business services (led by James Hay’s UK HQ with around 500 staff) remains significant, despite a loss of Capita and Aviva Financial Services jobs.



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 66.1% | 60.4% | -5.7% |

The WCS allocates 29 ha of employment land.

- Fuggelstone Red 8 ha;
- Longhedge 8 ha;
- Churchfields 5ha;
- UKLF Wilton 3ha;
- Former Imerys Quarry 4ha.

Since 2011, 0.3 ha of employment floor space have been completed. At 2017, 1.03 ha of employment floor space remains committed (non-implemented planning permissions). Employment delivery as an element of the mix of uses on strategic sites has not met expectations in the WCS.

The allocation at Churchfields has not been implemented. The site has been the subject of masterplanning and detailed negotiations between land owners. This has highlighted more complexity to delivery than was initially anticipated when the site was originally allocated. However the work is ongoing and remains a deliverable option.

The Strategic Economic Plan refers to work with the Highways Agency to ensure that the A36 can fulfil its strategic role and also support growth in and around Salisbury. The SEP suggests maximising opportunities to accelerate the delivery of strategic housing sites through investment in infrastructure and enabling works.

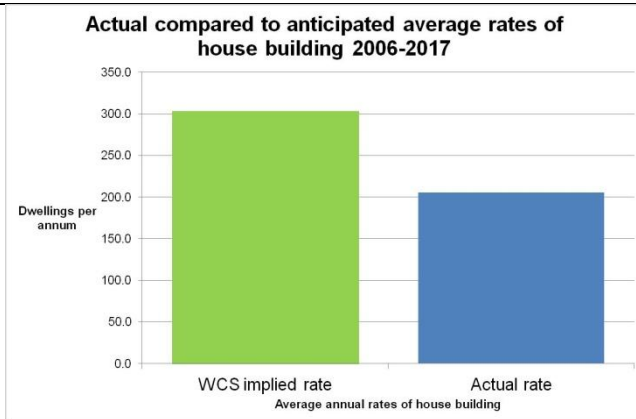
Town Centre: The WCS seeks to ensure that Salisbury can maintain its place as an important retail centre in the face of intense sub-regional competition, including from nearby centres such as Southampton, Bournemouth and Winchester. It is intended to deliver up to 40,000 m2 gross external area retail and leisure floor space and significant enhancements to the retail core of Salisbury in order to clawback expenditure.

The Salisbury Central Area Regeneration Programme comprises a number of brownfield development opportunities including office and employment space, housing, hotels, and cultural facilities including sites at The Maltings/Central Car Park and Churchfields.

Redevelopment of the Maltings/Central Car Park, complementing the historic street pattern

of Salisbury, will provide additional retail floor space and a choice of department stores. Funding has been secured through the Local Growth Fund to address land quality issues and support scheme viability. A mixed use scheme is being prepared for retail, leisure and housing.

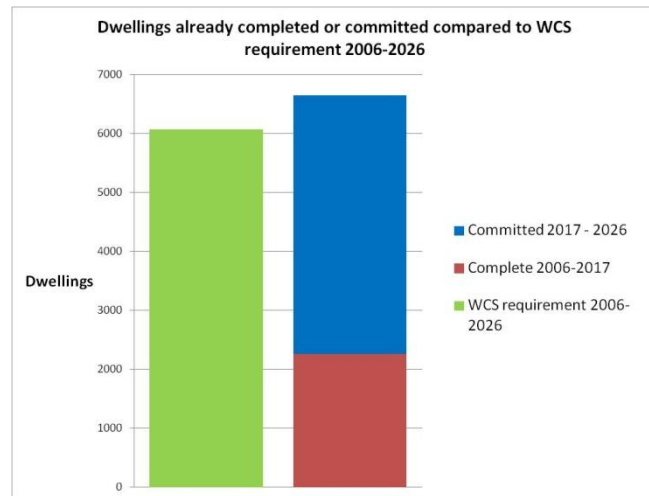
The Wiltshire Council Retail Review (2015) suggests there is modest capacity for additional convenience goods retail (2,162 m2 by 2026). For comparison goods, the study states that comparison goods floorspace capacity will grow substantially by 2024-2026 based upon a constant market share. Further capacity would be generated where a city centre development scheme is able to raise the city's market share.



Housing

House building has been below anticipated rates. The city has a significant supply of land already permitted or allocated. There continues to be delay, however, in delivering land for housing at Churchfields, allocated for 1,100 dwellings and a central proposal for the development of the City.

Affordable housing was 28% of all homes built, below target levels. The ratio of house price to earnings rose from 10.5 to 11.5 between 2011 and 2016. The ratio is above the average for settlements in Wiltshire.



Infrastructure

Transport: measures in the Salisbury Transport Strategy are being refreshed. There are air quality concerns in the city centre and on Wilton Road. Congestion on the A36 (T) and other arterial roads constrains growth. The historic street layout is not designed for high volumes of motor vehicles, but maintaining the attractiveness of Salisbury is important to the tourist industry. Alternatives to the private car could be improved. The City lacks cross-city bus routes and poor access to the station. These could be improved (possibly including provision of a new parkway station at Wilton, for which a feasibility study is underway). This would benefit the tourism industry. The Park & Ride network has capacity to absorb demand if city centre parking is reduced. There may be potential for rail-freight at the Imerys site.

Schools: Primary provision has little or no capacity and caters for immediate forecast needs only. This current “at capacity” situation for primary aged pupils is expected to feed through to the secondary level over the next 10 years to challenge and exceed current capacity. Growth would need to involve allocations large enough to provide new primary provision. Secondary expansion is possible in some areas. The large surplus of places available at Sarum Academy is expected to be taken up by existing demand coming forward however the school does have capacity to expand further.

Water Network: Wessex Water states that there is planned investment to help reduce phosphates and provide capacity between 2020 -2025. Development of the works is likely to extend onto land that Wessex Water owns outside of the existing operational site.

Neighbourhood Plan

No neighbourhood plan is in preparation for Salisbury. Three neighbourhood plans are under preparation outside Salisbury: Wilton, Whaddon & Alderbury, and Odstock.

River Avon Nutrient Management Plan

The Nutrient Management Plan aims to reduce and manage phosphorus levels in the River Avon Special Area of Conservation (SAC), in accordance with international obligations, principally in the EU Habitats, Wild Birds and Water Framework Directives. It will also help to facilitate development and change in the catchment of the river by ensuring that they do not add to the phosphorus load in the river in a way that might conflict with the conservation objectives for the SAC. The Plan includes an ‘ambition target’ for phosphate levels by 2021, an interim step to achieving favourable status. The Plan is currently under review.

Constraints

See map.

The overall potential for significant urban regeneration is medium. Preserving the setting to Salisbury Cathedral constrains the extent of development on surrounding slopes to the City. Extensive corridors of land are areas of flood risk (FZ2 and 3). An Area of Outstanding Natural Beauty lies to the south of the City. Further development may also risk raising phosphate levels in the River Wyle to levels that have adverse effects on the River Avon SAC.

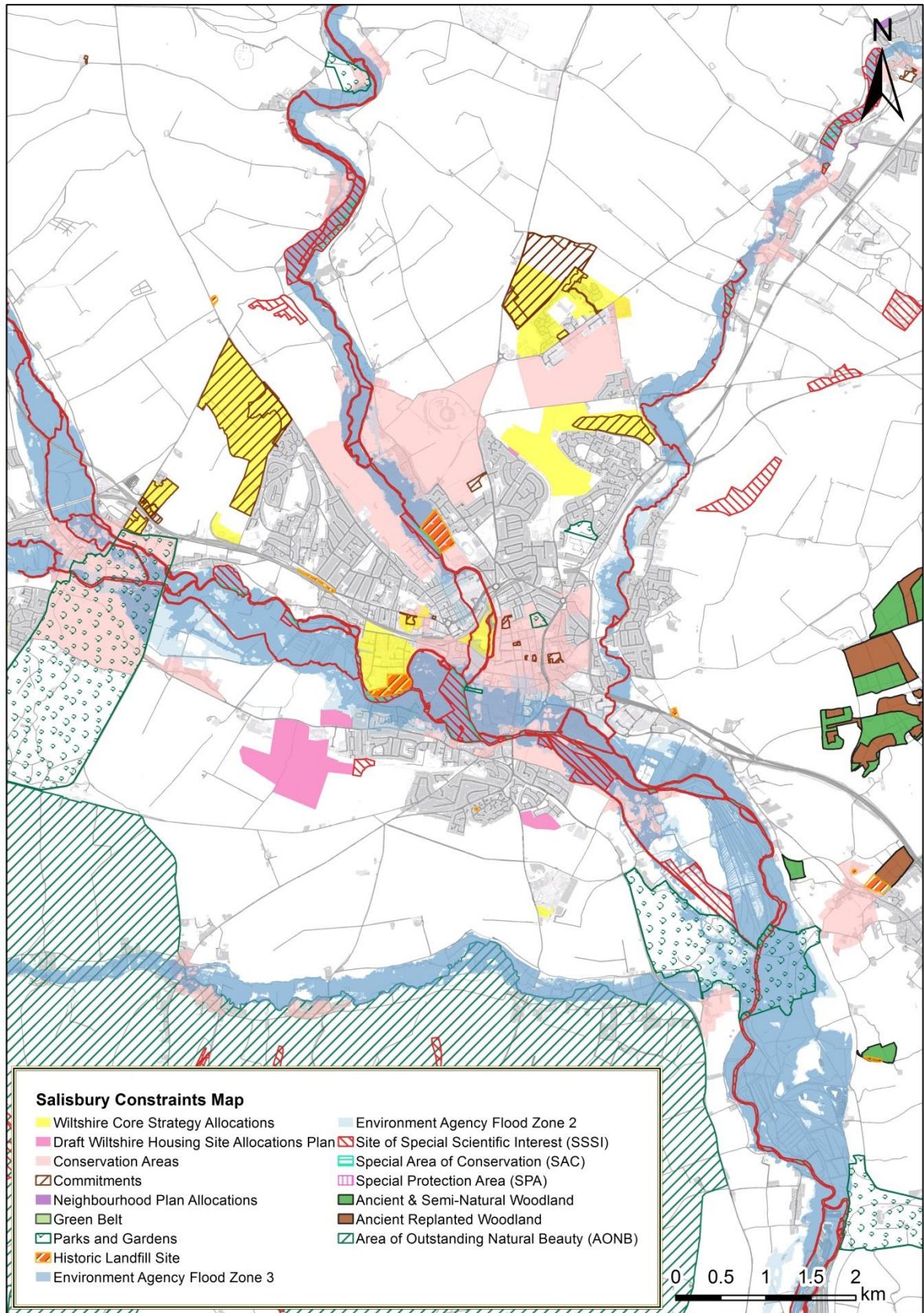
Settlement Strategic Issues

Key findings

- Major investments in the city centre on regeneration sites, a main WCS focus, have yet to be realised. The delivery of city centre schemes could be a significant support for the city’s retail and tourism sector.
- Rates of employment development (in B use classes) have been slow and new employment land difficult to realise on strategic sites.
- Large strategic mixed sites on the periphery have only recently commenced.
- There are possible infrastructure and environmental constraints to growth, including the impact of increasing phosphate levels affecting the River Avon SAC.

Issues

- Should the role of the City change in emphasis from that envisaged in the WCS? If so, how?
- What potential is there for economic growth, in what sectors and what land and premises will need to be provided? Are current employment land allocations sufficient?
- Is there scope to bring about more re-use of brownfield sites to limit the loss of greenfield land, such as at Churchfields? If so, how could this be realised?
- Looking to 2036, what should be the key investments in transport or other major infrastructure?



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Amesbury, Bulford and Durrington

Amesbury is situated some eight miles north of Salisbury with Salisbury Plain, a large military training area, further to the north. It is located on the A303, a major arterial route from London. The town is surrounded by an ancient landscape: it is close to the World Heritage Site of Stonehenge. They are designated as a Market Town in the WCS.

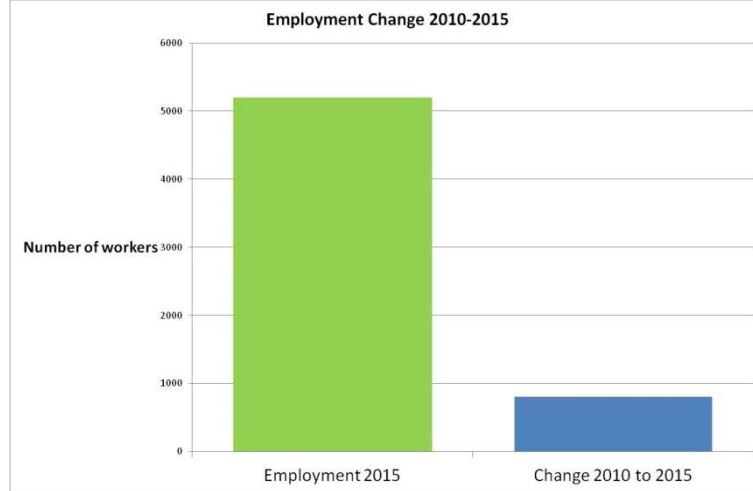


The Wiltshire Core Strategy Vision

"Amesbury will continue to be the focus of managed growth within the Community Area. The town will have a good choice of transport and provide a good range of services including retail and health, acting as an important service centre to many of the villages. It will have good levels of employment, including the specialist sectors within the MoD, QinetiQ at Boscombe Down and the scientific research at Porton Down. Amesbury will be a thriving community reflecting the aspirations of its residents. It will be a place where people want to stay, attracting new residents, businesses and visitors alike. Managed growth will have provided new homes and jobs, which support improved services and retail choice and cement Amesbury's own specific identity as a self-supporting community which has reduced the need to travel to larger urban centres like Salisbury or other larger centres along the A303 corridor."

Economy

- Solstice Park: Southern UK Distribution Centre for TJ Morris (Home Bargains) creating up to 1000 logistics jobs, plus new buildings for UK Headquarters for The Tintometer (AEM), for example, and further plots are coming forward.
- Boscombe: QinetiQ operates MoD Boscombe Down (2000+ staff) under a Longterm Partnering Agreement to carry out aerospace development, maintenance and training facilities.
- Defence-related and life science developments at Porton: new investment by DSTL, Porton BioPharma now the commercial operator for PHE (as PHE move functions to Harlow); and the Science Park to provide flexible investment space for the sector.



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 41.9% | 37.6% | -4.3% |

Solstice Park (64 ha) is one the largest employment areas in the County. Since 2011, at Amesbury, 9.8 ha of employment floorspace has been completed. The largest completion is a regional distribution centre at Solstice Park (9.4 ha). In addition to industrial and commercial units, the site hosts hotels, leisure and retail units.

The 2011 Employment Land Review underpinning the WCS states that Amesbury represents an important Research and Development cluster in Wiltshire. While not situated at the town of Amesbury, Porton Down is an allocation of 10 ha. The site is subject to WCS Core Policy 5 (Porton Down Science Campus). Porton Down benefits from planning permission and is being built out. The SEP specifically points to the development of a cluster of health and life sciences companies adjacent to the Defence Science and Technology Laboratory (Dstl) and Public Health England with specialisms in microbiology, immunisation and medical care.

The WCS allocates 7 ha at Boscombe Down. However, subsequent to the recent MOD Estate Review the site has been identified as one that will play a key national role going forward and hence a whole site masterplan for the wider Ministry of Defence site is being developed covering 300 ha. A main aim is to develop the area as defence aerospace cluster which would bring significant associated growth opportunities to the immediate area. A Master Plan is being developed to facilitate further investments based around this sector which is likely to require significantly more land than the 7ha proposed and that a very much larger allocation could be supported by the market and is potentially feasible. Currently the master planning of the site sees potentially in the region of 14,000 new jobs being provided at the site over the next 15 years. This has implications for infrastructure and housing in the area.

The wider Salisbury Plain area will also receive an economic boost from the stationing of approximately an additional 4,000 troops as a result of army restructuring and its rebasing programme.

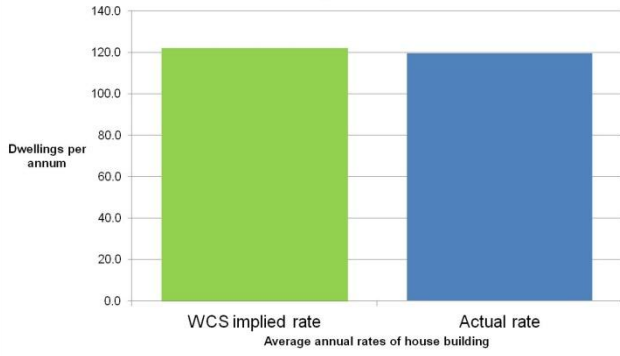
The completion of the Stonehenge Visitor Centre has supported local tourism and planned improvements to the A303 will increase the areas connectivity and enhance the area's attractiveness to investment.

At Amesbury town, 3.8 ha of employment floorspace remain permitted but unimplemented. The largest commitment is a permitted data centre building at Solstice park of approx. 1.9 ha floorspace.

Town centre: The vitality and viability of the town centre has been supported by further convenience retail provision within and on the edge of the centre, although there have been concerns over the loss of other smaller retail units to non-retail use. A new local centre at Kings Gate meets day-to-day needs of the Archers and Kings Gate areas. There is however evidence of additional need in the area driven by the Army Rebasing Programme.

The Wiltshire Council Retail Review (2015) suggests, however, there is very little potential for additional convenience goods floor space, and no capacity for additional comparison goods floor space at Amesbury until 2026.

Actual compared to anticipated average rates of house building 2006-2017

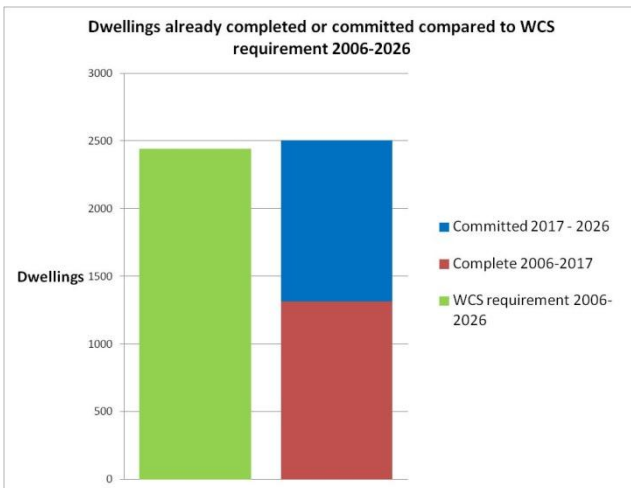


Housing

House building has been in accordance with anticipated rates. Land for a further 900 dwellings is allocated at Kings Gate, Amesbury. Amesbury has been the dominant focus for housing development.

Affordable housing was 27% of all homes built, below target levels. The ratio of house price to earnings rose from 9.4 to 10.8 between 2011 and 2016. The ratio is average for settlements in Wiltshire.

Dwellings already completed or committed compared to WCS requirement 2006-2026



Infrastructure

Transport: Good road connectivity is attractive to business investment but also contributes to significant net out-commuting. Peak time traffic delays could be addressed by planned improvements to the A303. Though there are good bus connections to Salisbury, connections to elsewhere are poor and difficult to improve. There may be potential for a new rail station at Porton but a feasibility study is required. Walking and cycling improvements around the Stonehenge World Heritage Site (WHS) and linking to Amesbury could bring

economic benefits of the WHS to the town. A new access from the A303 to Boscombe Down is being delivered by the Council and the further potential of this link being assessed.

Schools: A current shortage of local Primary provision arising from Army Basing will be addressed by a new school scheduled to open in 2019. Further significant growth would be likely to require a further new school. Secondary provision is being expanded and there is possibly room for some further expansion.

Water Network: Wessex Water states that additional capacity has been provided (Asset Management Plan 5 (2010-15)). There are currently no plans for further investment to increase capacity.

Neighbourhood Plan

There is currently no neighbourhood plan under preparation.

Salisbury Plain Masterplan

Resulting from army restructuring, a rebasing programme will result in locating approximately an additional 4,000 troops in the Salisbury Plain Area. This will create a significant local economic boost as well as additional requirements for infrastructure. The Salisbury Plain Masterplan sets out an overview of the proposed changes to the Salisbury Plain Training Area. It identifies the additional infrastructure requirements that are needed; social, education and economic. The requirement for 1217 units of military housing is over and above the general housing requirement set out in the WCS (540 Larkhill, 277 Bulford, 100 purchased at Tidworth, 300 Ludgershall).

River Avon Nutrient Management Plan

The Nutrient Management Plan aims to reduce and manage phosphorus levels in the River Avon Special Area of Conservation (SAC), in accordance with international obligations, principally in the EU Habitats, Wild Birds and Water Framework Directives. It will also help to facilitate development and change in the catchment of the river by ensuring that they do not add to the phosphorus load in the river in a way that might conflict with the conservation objectives for the SAC. The Plan includes an 'ambition target' for phosphate levels by 2021, an interim step to achieving favourable status. The Plan is currently under review.

Salisbury Plain Special Protection Area (SPA) – Habitats Regulation Assessment and Mitigation Strategy

The strategy addresses concerns over the effects of increasing recreational pressure upon breeding Stone Curlew populations. It provides an evidence base of predicted visitor levels and their effects. It suggests a range of mitigation measures to prevent adverse effects from accommodating anticipated growth to 2026.

Constraints

See map.

The overall potential for significant urban regeneration is low. There are relatively few environmental constraints compared to other main settlements in the plan area. The setting to the Stonehenge WHS would be a factor restricting westward extension to the town and a

possible design constraint on development elsewhere. Further development may also risk adverse effects on the River Avon SAC and Salisbury Plain SPA.

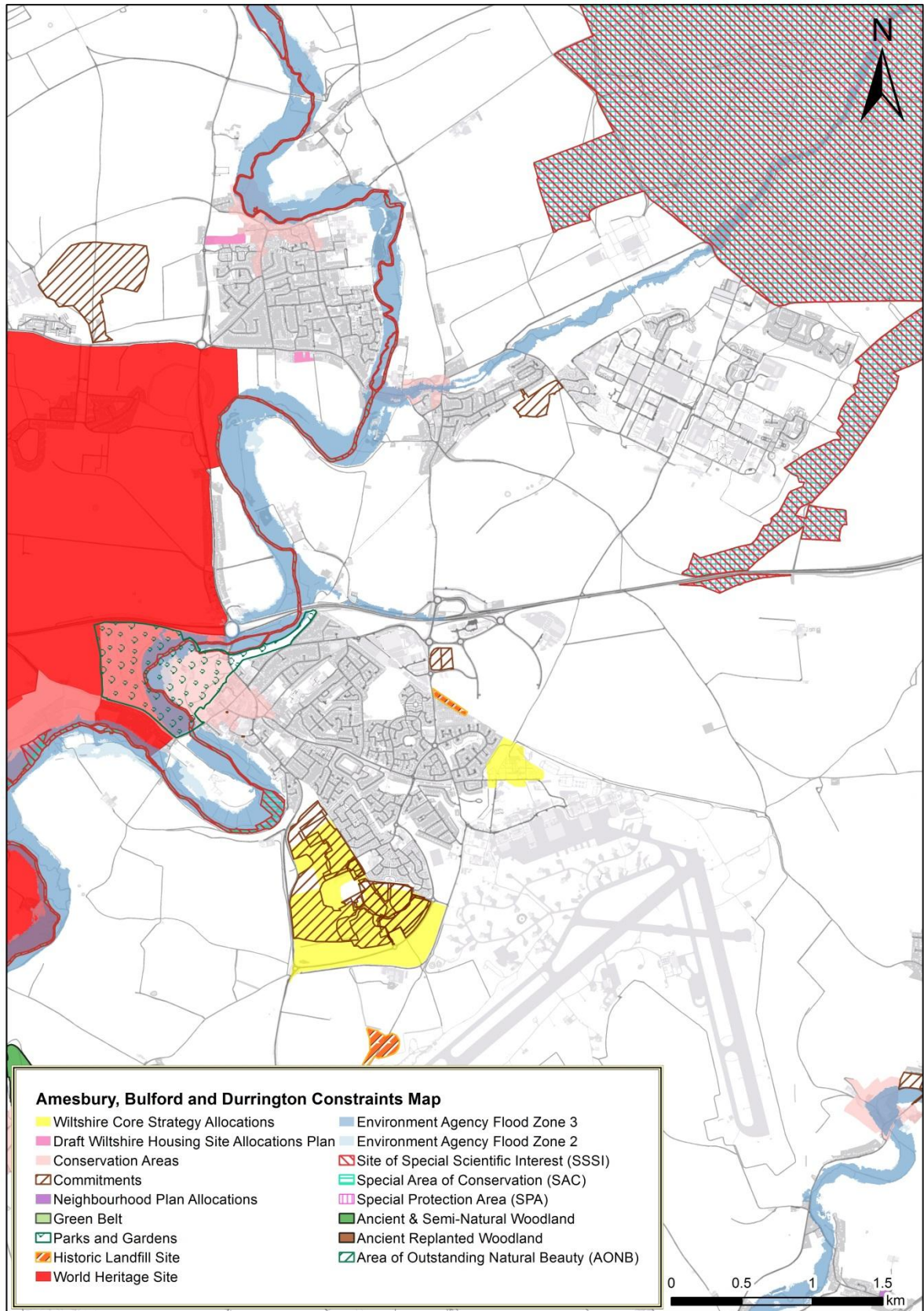
Settlement Strategic Issues

Key findings

- The area is a focus for investment containing two recognised business clusters creating job growth
- Amesbury is the dominant focus for housing development
- The trading position of the town centre needs consolidation
- Environmental designations may be a constraint on development

Issues

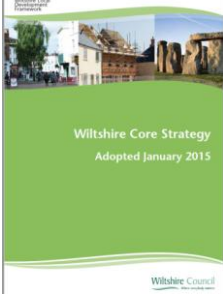
1. What more can be done to improve the range of services to improve the attractiveness of the area?
2. Should planning for Amesbury be distinct to planning for Bulford and Durrington?
3. How should the area capitalise on business investment? What amount of further housing is appropriate?



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Tidworth and Ludgershall

The small towns of Tidworth and Ludgershall, have complementary roles and are being planned for jointly to help them develop a number of shared facilities and resources. They are designated as a Market Town in the WCS.



Wiltshire Core Strategy
Adopted January 2015

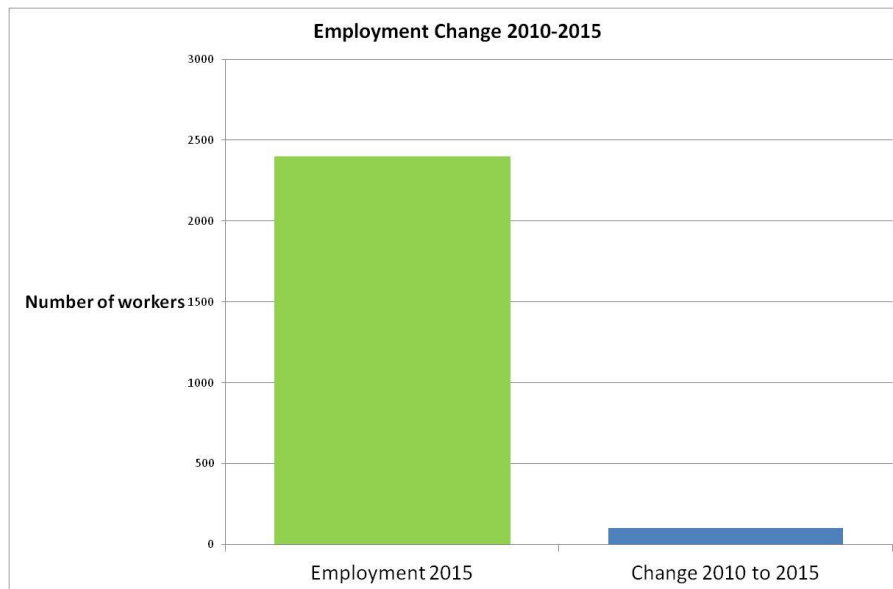
Wiltshire Council

The Wiltshire Core Strategy Vision

"The settlements of Tidworth and Ludgershall will have developed their complementary roles and taken full advantage of opportunities to develop sustainable brownfield sites. Growth will have reflected the need to create a more balanced community and act as a catalyst to attract inward investment with new employment opportunities complementing those provided by the MoD. The future of existing and former MoD sites will be carefully integrated into the needs of the wider community. The River Bourne Corridor, Salisbury Plain and Chute Forest will continue to provide social, environmental and economic assets to the area as part of a wider green infrastructure network which will be used and managed sustainably."

Economy

- Aspire Defence provides fully serviced living/working accommodation for a large proportion of British Army. It employs 700 staff work across 4 camps.
- Castledown Business Park: new phases start up and growth space in conjunction with TEN.



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 66.2% | 66.3% | +0.1% |

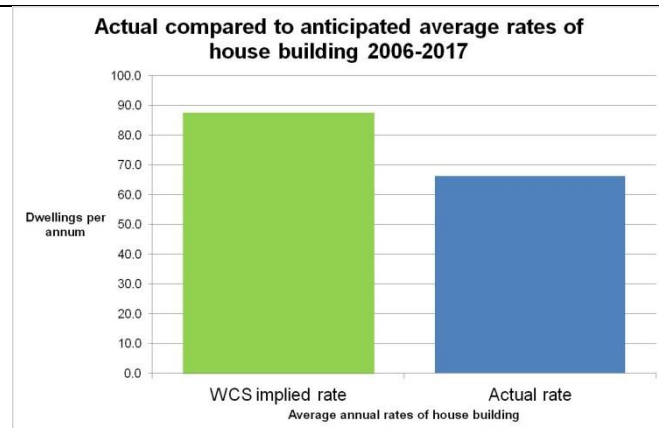
There is currently a shortage of quality employment premises for small and medium sized

enterprises, including incubation facilities and managed workspaces in the area. Castledown is mentioned as a 'success story' in the 2011 ELR in terms of the incubation space scheme which was completed in 2008 and had 90% occupancy levels, although this is only for approximately 5,000 sq. ft of space.

Land to the North of Tidworth Rd (Castledown) is a saved Kennet District allocation of 12 ha. The first two phases of which are now complete. The WCS allocation has not been permitted/ implemented. The 2011 ELR notes in regard to this site that this is a large site for a rural location and take up is likely to be slow.

Since 2011, 0.3 ha of employment floor space have been completed at Tidworth and Ludgershall. As of 2017, there remain 0.13 ha of employment floorspace permitted.

The wider Salisbury Plain area will also receive economic boost from the stationing of an additional 4,000 troops as a result of army restructuring and its rebasing programme.



Housing

House building has been below anticipated rates. The settlement has a significant supply of land already permitted or allocated.

There is a relatively young population age structure compared to elsewhere and the highest proportion of people of employment age (74%) in the plan area.



Affordable housing was 18% of all homes built, well below target levels. The ratio of house price to earnings rose from 7.5 to 9.4 between 2011 and 2016. The ratio is below the average for settlements in Wiltshire.

Infrastructure

Transport: despite a relatively good level of self-containment, there is still significant out-commuting encouraged by good road connectivity and because there is limited employment beyond jobs associated with the MoD. Additional growth is likely to have a detrimental impact on delays at the memorial junction in Ludgershall.

Schools: The Housing Site Allocations Plan reserves a site at Empress Way for a Primary School capable potentially of providing capacity for needs that may arise in Ludgershall after 2026. Wellington Secondary is being expanded and might be capable of some further expansion. Military relocations tightens primary school capacity in Tidworth and complicates forecasting needs.

Neighbourhood Plan

There are no neighbourhood plans under preparation at this market town.

Salisbury Plain Masterplan

Resulting from army restructuring, a rebasing programme will result in locating approximately an additional 4,000 troops in the Salisbury Plain Area. This will create a significant local economic boost as well as additional requirements for infrastructure. The Salisbury Plain Masterplan sets out an overview of the proposed changes to the Salisbury Plain Training Area. It identifies the additional infrastructure requirements that are needed; social, education and economic. The requirement for 1217 units of military housing is over and above the general housing requirement set out in the WCS. (540 Larkhill, 277 Bulford, 100 purchased at Tidworth, 300 Ludgershall).

River Avon Nutrient Management Plan

The Nutrient Management Plan aims to reduce and manage phosphorus levels in the River Avon Special Area of Conservation (SAC), in accordance with international obligations, principally in the EU Habitats, Wild Birds and Water Framework Directives. It will also help to facilitate development and change in the catchment of the river by ensuring that they do not add to the phosphorus load in the river in a way that might conflict with the conservation objectives for the SAC. The Plan includes an 'ambition target' for phosphate levels by 2021, an interim step to achieving favourable status. The Plan is currently under review.

Salisbury Plain Special Protection Area (SPA) – Habitats Regulation Assessment and Mitigation Strategy

The strategy addresses concerns over the effects of increasing recreational pressure upon breeding Stone Curlew populations. It provides an evidence base of predicted visitor levels and their effects. It suggests a range of mitigation measures to prevent adverse effects from accommodating anticipated growth to 2026.

Constraints

See map.

Urban capacity is high, largely, however, because of the significant amount of potential MoD controlled land. There are relatively few environmental constraints compared to other main settlements in the plan area. Areas are reserved, however, for military use. Further development may also risk adverse effects on the River Avon SAC and Salisbury Plain SPA.

Settlement Strategic Issues

Key findings

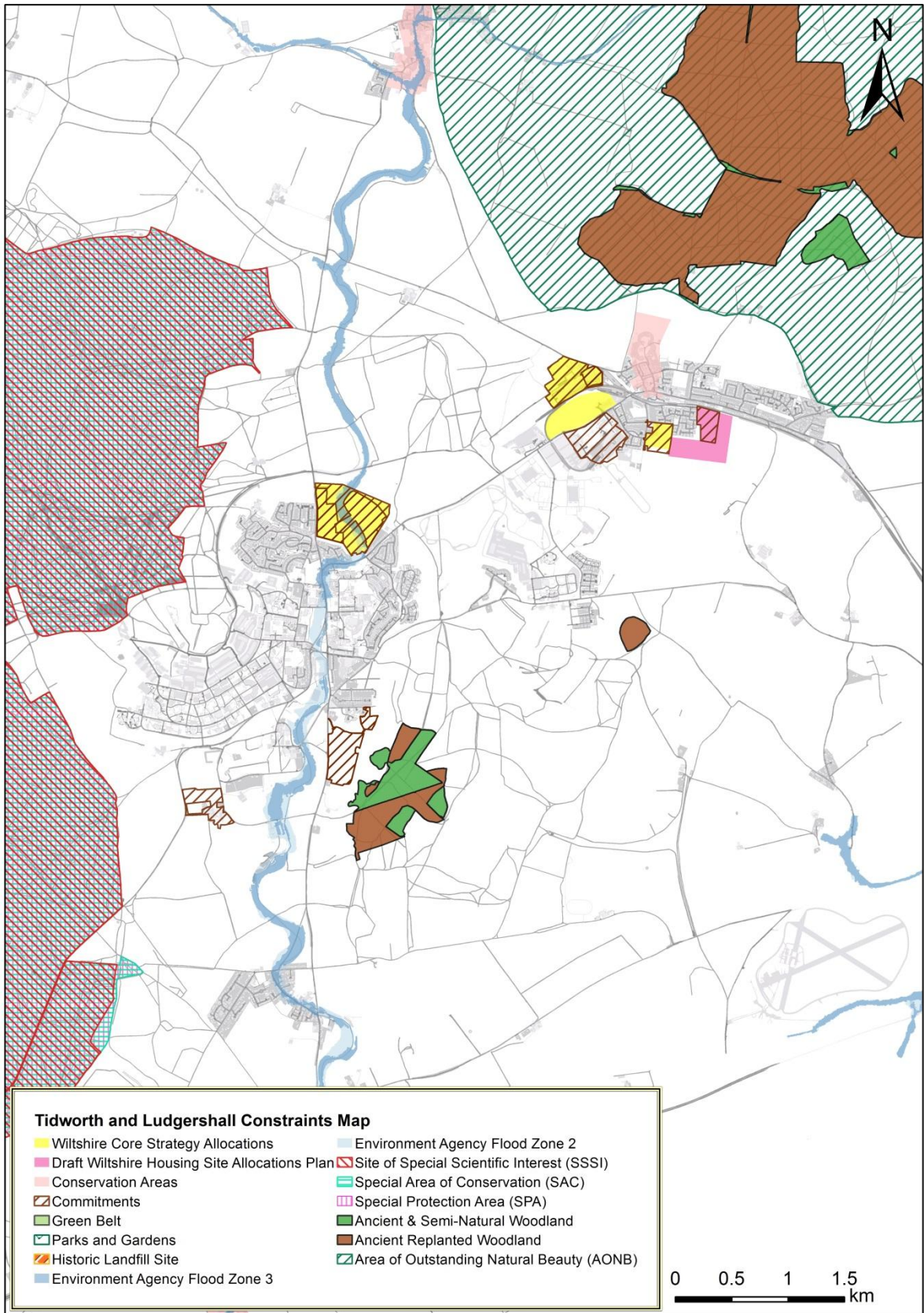
- The local employment base relies heavily on the MoD, which is also a major land

owner. This also affects the social and economic balance of the community

- A relatively significant amount of land for housing development is already allocated or permitted
- The WCS allocation has so far not been attractive to investment and there appears to be un-met demand for employment development
- Phosphate levels in the River may pose a constraint to development

Issues

1. How can growth be encouraged to do more to diversify the local economy and provide a more balanced age and social structure?
2. Should the vision be more specific in terms of the type of employment envisaged?
3. Are additional employment allocations required to provide fit-for-purpose space?



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Salisbury Housing Market Area – Strategic Issues

Overall the evidence presents a mixed picture on progress of the WCS strategy at main settlements in the Salisbury HMA.

The evidence suggests that there has been relatively little progress at Salisbury in terms of city centre regeneration projects and employment delivery. While housing delivery rates have been below what was anticipated there are a significant number of commitments underway or imminent.

Amesbury has seen housing delivery in line with anticipated rates and Solstice Park and Porton remain an important focus for additional economic growth and new investment. Job growth at Amesbury has been higher than at Salisbury.

The evidence suggests that economic diversification at Tidworth/Ludgershall is not progressing and job growth has been minimal. The impact of army rebasing may, however, provide a significant new impetus.

Environmental constraints, especially phosphate levels in the River Avon and possibly the need to protect breeding stone curlew on Salisbury Plain SPA, present a potential restriction to growth across the HMA. Improvements to the A303 will enhance the area's connectivity but elsewhere transport infrastructure requires upgrading, especially around Salisbury and Amesbury in order to support growth.

Strategic Issues for the HMA at this stage are:

- The SHMA suggests a modest decrease in housing needs in the Salisbury HMA, but the FEMAA states that a shortfall of labour could result. Could economic growth be hampered by insufficient housing over the plan period and should housing provision instead exceed assessed needs?
- A central proposal for Salisbury contained in the WCS, and therefore for the HMA as a whole, is the redevelopment of Churchfields, should this proposal be reconsidered? How can this opportunity be realised?
- Important business clusters in the HMA are quite detached from main settlements. Environmental constraints in the HMA might also possibly restrict further significant expansion of these main settlements? Is there a need to re-think where and how growth takes place in the HMA?

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Appendix 1: Part 4

Swindon Housing Market Area

**Individual Settlement and Housing Market Area
Profile**

DRAFT

Committee Draft

October 2017

Introduction

This document is one of four Housing Market Area Profiles which have been prepared to inform the Swindon and Wiltshire Joint Spatial Framework: Issues Paper. It provides an assessment of the main settlements in the Swindon Housing Market Area and the strategic issues they face. This is a first step to understanding the opportunities and constraints of growth before considering how each place could develop sustainably; whether its role continues as currently planned or how it should change.

In combination with profiles for the Chippenham, Salisbury and Trowbridge Housing Market Areas, this better understanding of our main settlements can inform the assessment of whether and how the housing and employment needs in each market area can be met.

The profiles contained in this document draw on existing published data sources such as the current understanding of the role and function of each main settlement, the 2011 Census, the Council's own monitoring reports and other local area documents such as neighbourhood plans.

Each profile presents a snapshot assessment of progress with the current strategy included in the Wiltshire Core Strategy, a picture of environmental constraints, the local community's vision (where there is neighbourhood plan) and the position from providers of underlying infrastructure (transport, water and education) which is essential to every settlement but which has the potential to also be a significant barrier to further growth.

The main findings for each settlement are summarised below followed by a set of issues specific to each settlement. These identify where the current development plan strategy may need to change. They are phrased as questions because the vital part of this stage in the Local Plan review is to invite community and stakeholder input on how the current strategy should change; what issues it should address and how future needs can be met by sustainable development.

Swindon Housing Market Area

The Swindon Housing Market Area extends from Swindon in the north-east to Marlborough in the south-east and the rural villages of east Wiltshire in the west.



The 2017 Strategic Housing Market Assessment (SHMA) forecasts objectively assessed need for housing (including the overall balance between market and affordable housing). The study identifies the need for housing in this market area over the period 2016-2036 to be 28,000 dwellings. Taking account of altered boundaries, this would represent a modest decrease on the annual levels of new house building planned for in the Wiltshire Core Strategy for the period 2006-2026 and in the Swindon Borough Local Plan for the period 2011-2026.

The Swindon/M4 Corridor Functional Economic Market Area (FEMA) broadly aligns with the Swindon Housing Market Area. The Swindon/M4 Corridor FEMA has notable business concentrations in motor vehicle manufacture,

pharmaceuticals and electronics. Science, Research & Development and financial and high value services are also concentrated in the FEMA as well as warehousing and logistics. The Swindon/M4 Corridor FEMA has the lowest concentration of public services employment of the three Wiltshire FEMAs. The Swindon/M4 FEMA has a strong eastward focus, into the Thames Valley and towards Oxfordshire, and is dominated by Swindon, which is the largest urban centre in the area. There remain issues of the levels of educational attainment in the FEMA being below the national average, particularly in Swindon itself. The SHMA suggests that planning for housing growth on the basis of demographic and migration trends alone could result in a marginal shortage of new workers in the Swindon HMA in comparison to the projected number of new jobs based on economic projections. Accordingly, the SHMA adjusts the projected need for housing upwards to compensate for this.

The 2017 Functional Economic Market Area Assessment (FEMAA) forecasts that 15,000 new jobs will be created in 2016-36 within the Swindon/M4 Corridor FEMA, with the main growth occurring in business support services, construction, retail and food & beverage services. The study forecasts for 2016-36 the following levels of demand for additional business floor space by type:

| Use class | Growth in floor space (in m2) |
|------------------------------|-------------------------------|
| B1a offices | 48,740 |
| B1b research and development | 28,780 |
| B1c light industrial | 7,490 |
| B2 industrial | -62,110 |
| B8 storage and distribution | 43,320 |

Taking into account churn, re-use of employment sites and accounting for additional land requirements, the FEMA forecasts a total of up to 47.9 ha for office space and 87 ha for industrial. This equates to up to 2.4 ha and 4.3 ha annually respectively for the entire Swindon/M4 FEMA. The quantum of floor space required will depend upon where the new employment buildings are built. For example, office buildings in town centres tend to be multi-storey have smaller car parks, in comparison to single-storey offices built on business parks on the urban periphery or in rural areas.

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Swindon

The town of Swindon is the largest settlement within the historic county of Wiltshire, more than four times the size of the next largest (Salisbury). In 2011 the population of the Swindon urban area was 185,609, making up approximately 27% of the total combined population of Wiltshire and Swindon Borough (Census 2011) and 85% of the population of Swindon Borough.

| | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p>Swindon Borough Local Plan 2026 Swindon: Planning for our future Adopted 5th March 2018</p> | <h3>The Swindon Borough Local Plan Vision</h3> <p>The Swindon Borough Local Plan 2026's vision relates to the Borough as a whole, rather than the town of Swindon exclusively, but parts of its text are specifically applicable to the town of Swindon:</p> <p><i>"The Borough of Swindon will become a place where people choose to live, visit and invest. As an important regional centre, Swindon's appeal will stem from having an attractive and well-equipped town that has successfully blended traditional architecture with high quality contemporary buildings that incorporate sustainable design and construction principles.</i></p> <p><i>The achievement of a high quality public realm in the heart of the town linked to the countryside will provide a real focal point for visitors and Swindonians alike. Swindon will become one of the best business locations in the UK, offering a high quality of life, not just to its residents, but also to those from a much wider catchment area. New jobs will be created and there will be the fullest range of employment opportunities for the whole community. Swindon will be at the centre of a network of multifunctional green spaces linking the town to the wider countryside. Swindon will have responded to the needs of a growing population in a way that has protected and enhanced our natural and historic environment. People in Swindon will have the opportunity to live active, healthy and learning lifestyles."</i></p> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Economy

Swindon has a high GVA (gross value added, a measure of productivity) per head, but has not been able to grow GVA in line with benchmark areas in recent years. However, the FEMAA's analysis identifies that Swindon's competitiveness is increasing and it has both high productivity and a high proportion of private sector employment, together with globally significant firms in UK priority sectors (e.g. Honda, BMW, Nationwide).

Weaknesses are identified as relative high price of rail services and distance from neighbouring cities and towns to Swindon, the poor perception of Swindon's town centre and its limited range of good quality cultural and leisure assets, the lack of executive style housing in the town and the weakness of its town centre office market.

The large urban expansions to the town, town centre regeneration and rail electrification are identified as opportunities for economic growth.

Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 83.7% | 73.4% | -10.3% |

Between 2001 and 2011 the number of people working Swindon Borough increased by 0.4%, whilst over the same period, the working age population of the Borough increased by 18% increase. The consequence of employment growth not keeping pace with housing growth has been a decline in self-containment and an increase in out-commuting, particularly to Oxfordshire, West Berkshire and Reading.

The SBC Local Plan Policy SD2 identifies that 90,000sqm of office space will be delivered in Swindon’s central area for the period 2011-2026. Analysis for the Employment Lane Review suggests that between 2011 and 2014 office floor space in Swindon Borough declined by a net 3,590sqm. A significant amount of the reduction has been as a result of the introduction of permitted development rights to convert offices to homes. There is a significant amount of office development land allocated in the Wichelstowe and Commonhead urban extensions and at the Kimmerfields development in the town centre. On current forecast, office supply would exceed estimated requirements for the period to 2036. However, there is evidence of a short term office land supply shortfall, particularly Grade A premises. Any allocation of a new office/business park at Swindon should be balanced against the need to support town centre regeneration.

The SBC Local Plan identifies a total of 115 hectares of additional employment land outside of Swindon Town Centre. However significant amounts are locked within the strategic allocations and will be difficult to deliver in the short-medium term. Also there is continued pressure for employment allocations to be developed for alternative uses such as homes and schools. To meet future needs there is potentially a need for an allocation of industrial land with good access to the M4.

Town centre: Swindon Borough Council’s Retail and Leisure Needs Assessment (2017) (RLNA) provides projections for the need for main town centre uses in Swindon and Swindon Borough in the period 2016 to 2036. The RLNA projects an oversupply by 2021 in floorspace for the retail of comparison goods. However, in the longer-term additional comparison goods capacity will be required to meet demand at Swindon Town Centre. By contrast, no additional requirement for convenience goods retail floorspace is identified for Swindon to 2036.

The RLNA states: “*The aspirations for Swindon Town Centre should be to significantly enhance the retail and leisure offer of the centre, building on the existing foundation of core retail and complementary uses, extending the evening offer and increasing the overall attraction and draw of the centre, to the benefit those living, working and visiting the centre*”.

Housing

Swindon’s ratio of house prices to earnings rose from 6.28 to 7.24 (+15%) between 2011 and 2016, but Swindon remains more affordable than the south west and England averages (for 2016, 8.40 and 7.58 respectively).

The population age structure of Swindon is notably younger than the age structure for Swindon and Wiltshire as a whole, with proportionately more residents aged 20 to 44 and fewer aged 60 or over. However a significant proportional increase in elderly persons is forecast to 2036/

The Swindon Borough Local Plan 2026 Policy SD2 identifies a housing requirement (2011-2026) for Swindon's central area of about 1,000 and for the remainder of Swindon's existing urban area of 4000. In addition, specific requirements are identified for the urban extensions to Swindon totalling about 16,500 dwellings. Trajectories for the anticipated delivery of housing are provided in Appendix 5 to the Swindon Borough Local Plan 2026.

Monitoring shows that whereas completions in the urban area are in line with the Local Plan trajectory, completions on the urban extensions are significantly less than anticipated. (1,991 compared to 4,023). This shortfall has impacted on the supply of houses to the extent the Council cannot presently demonstrate a five-year supply of housing.

Infrastructure

Transport: The Swindon Borough Local Plan and accompanying Infrastructure Delivery Plan identifies significant infrastructure in association with the current growth plans, including a new bus interchange in Swindon's central area, express bus links between Wichelstowe, the New Eastern Villages and Tadpole Farm to Swindon town centre, a link to Junction 16 of the M4 and improvements to Junction 16, improvements to the gateway junction at White Hart, improvements to Oxford Road/Drakes Way and Covingham Road/Dorcan Way transport corridors, a new road link to the Commonhead Roundabout, a 'green' bridge across the A419, and a vehicular bridge across the A419 to connect the Kingsdown development to the Swindon urban area.

Some of the improvements will be funded by developers through the development management process. Other improvements are being assisted by government funding, for example Local Growth Fund funding through the Swindon and Wiltshire Local Economic Partnership has been obtained to upgrade Greenbridge roundabout and for building transport infrastructure around the New Eastern Villages.

Schools: A new secondary school is under construction as part of the Tadpole Garden Village urban extension. The School Place Planning Study identifies the need for two further primary schools in north Swindon to support planned growth, one at Tadpole Garden Village and another at Abbey Farm.

In the central and southern area, to meet primary school requirements a further 2 primary schools will need to be provided at the Wichelstowe development. Establishing at least one new school and expanding an existing primary school in the central and south area will meet the remaining pressure in this area. A secondary school is under-construction within the Wichelstowe urban extension.

In east Swindon, development of the Commonhead, Kingsdown and New Eastern Villages urban extensions will generate need for an additional secondary school at the New Eastern Villages and additional primary schools comprising: a new primary school at the Commonhead development; 4 to 5 new primary schools at the New Eastern Villages; and a new primary school in the Kingsdown development area

In west Swindon there are no surplus primary places, indicating that any further growth in this area would require expansion of existing schools or additional schools.

Health: The Swindon NHS Health Centre opened in June 2017 as part of the Kimmerfields town centre development. New health care facilities are planned as part of the Wichelstowe and New Eastern Villages developments. Land is allocated at Commonhead for an expansion of the GW Hospital.

In the NHS Swindon Clinical Commissioning Group in 2016 there were 1,529 persons per GP (or 0.65 GPs per 1,000 people). This compares to an average for England of 0.58 GPs per 1,000 people.

Water infrastructure: The Swindon Water Cycle Study (2014) concluded that with demand management measures there would be sufficient water supplies to deliver the anticipated level for population growth in Swindon Borough up to 2026. The Thames Water Resources Management Plan 2015 – 2040 proposes demand management to address a supply/demand balance shortfall. Thames Water are currently working on a new Water Resources Management Plan. Additional Wastewater facilities may be required to meet future growth and meet river water quality standards.

Neighbourhood Plan

At present no made neighbourhood plans are in place for neighbourhoods within the Swindon urban area. The parish of Stratton St Margaret has been designated as a neighbourhood planning area for the purposes of preparing a neighbourhood plan.

From 1 April 2017 four new parishes were created covering previously unparished parts of the Swindon urban area: West Swindon, Central Swindon North, Central Swindon North and St Andrews Parish.

Air Quality

No Air Quality Management Areas (AQMA) are currently designated within the Swindon urban area.

Constraints

See map.

There is potential for development within the existing urban area on brownfield and under-used land, but there may be issues and in terms of the impact of this on diversity of uses and environmental quality including traffic levels. In addition, relatively low house prices may present an issue in terms of the viability of brownfield development in some parts of the Swindon urban area. There are conservation areas in the railway heritage area and in Old Town.

To the south east of Swindon, the North Wessex downs Area of Outstanding Natural Beauty and its setting abuts the urban area.

The M4 motorway runs to the south of the Swindon urban area, creating a significant physical barrier.

To the west of the Swindon urban area Lydiard Park, a Registered Park and Garden containing nationally significant heritage assets. There are also significant areas of flood risk around the River Ray to the west of Swindon.

To the north east of Swindon is Stanton Country Park. Beyond the planned New Eastern Villages, to the east of Swindon, are further significant areas of flood risk.

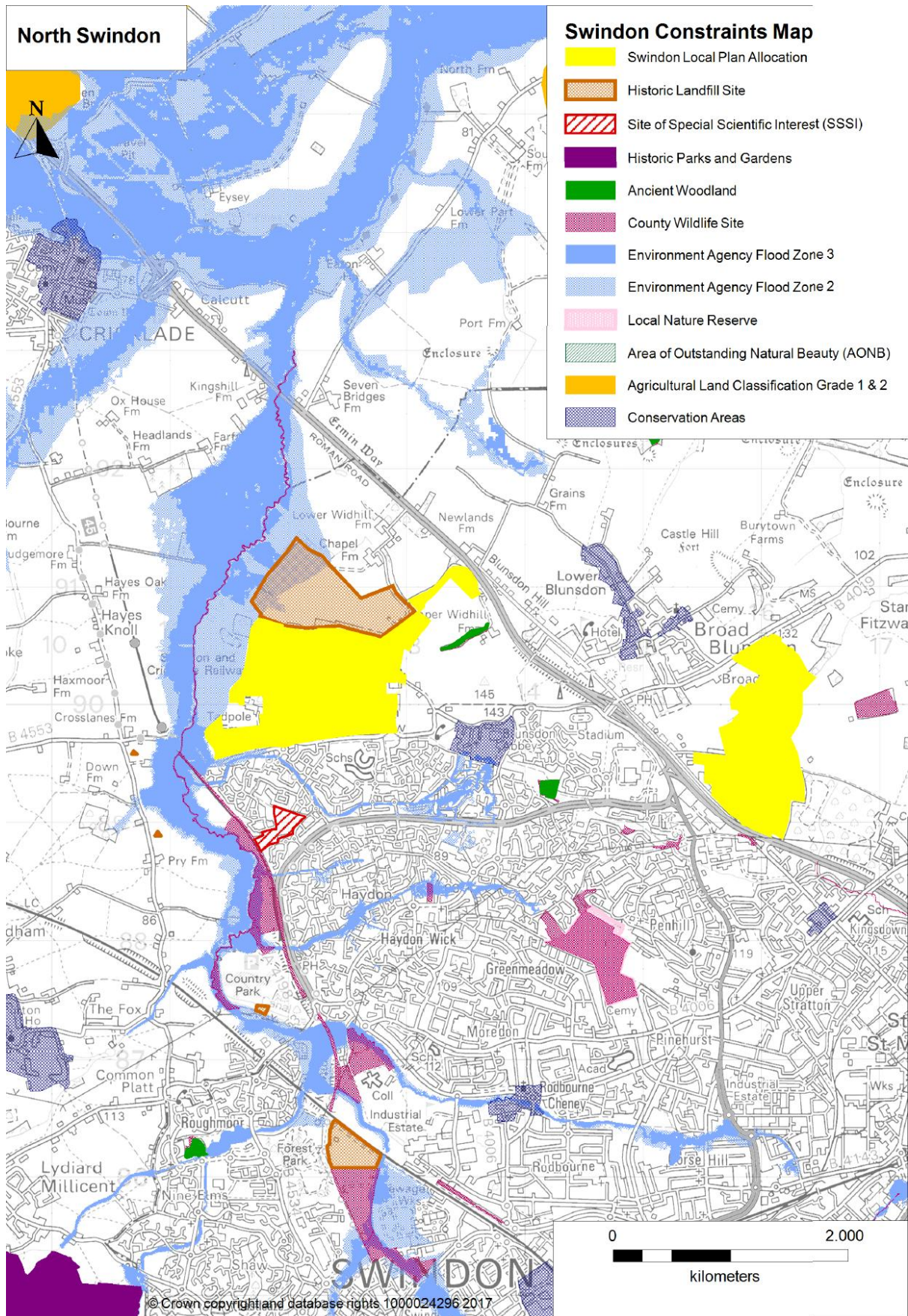
Settlement Strategic Issues

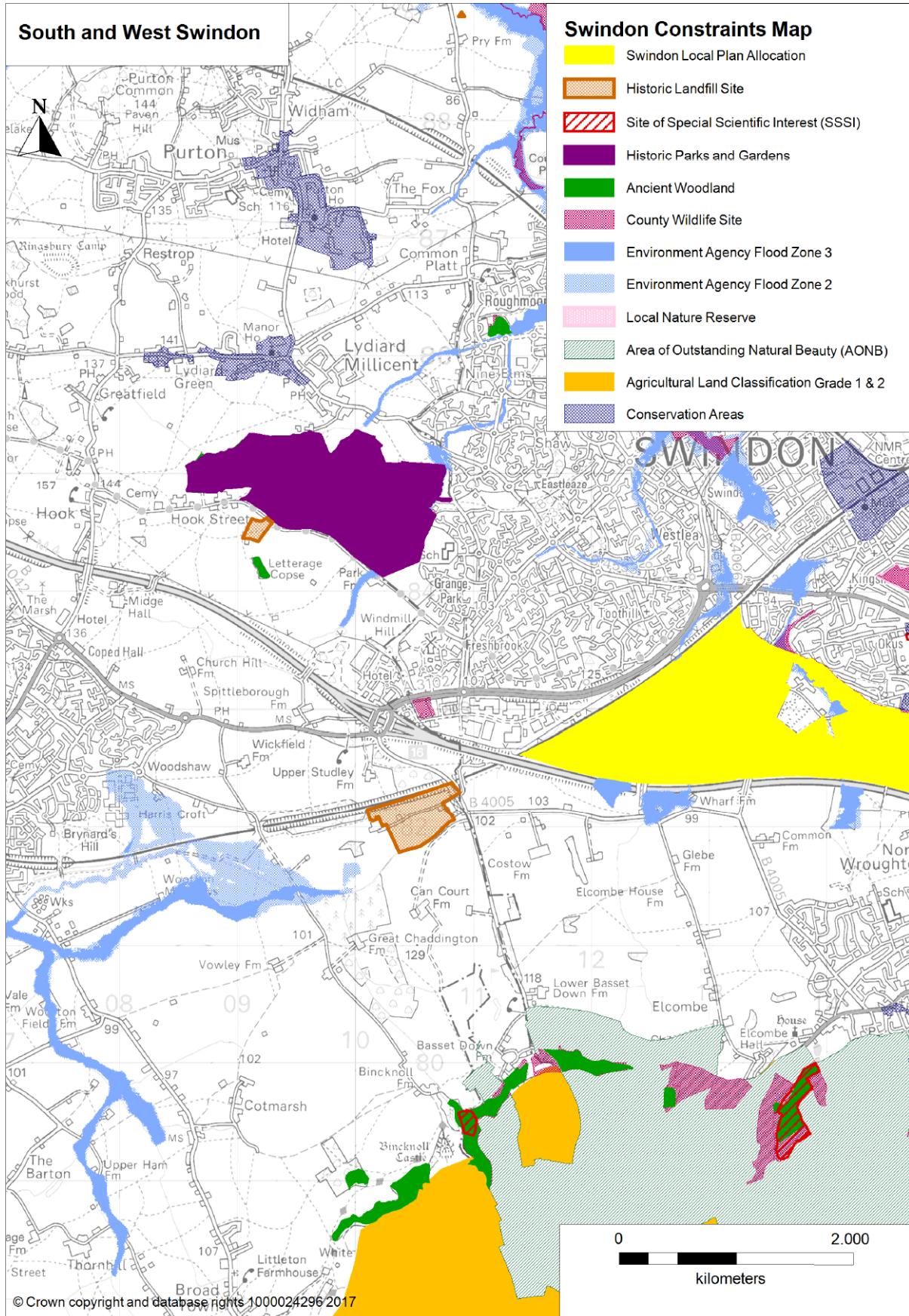
Key findings

- Overall housing delivery at Swindon has not kept pace with that projected in the Local Plan 2026, due largely to delays in the Kingsdown, New Eastern Villages and Wichelstowe urban extensions to Swindon.
- Very significant new infrastructure, including transport, education and health infrastructure is required to provide for existing planned levels of growth under the Local Plan 2026.
- There are significant employment land commitments, but delivery issues have led to a reported short-term shortage of high quality industrial land and office accommodation to meet demand from businesses.
- Job growth has not occurred at the same pace as housing growth, leading to increased out-commuting to neighbouring districts.
- There are significant economic opportunities at Swindon associated with growth sectors and rail electrification.
- Town centre regeneration will be vital to improving the town's image and realising its economic potential.
- The role of Swindon's town centre is changing, with non-retail uses likely to play an important role.

Issues

1. How much future housing can and should be built within the urban area? How can this be balanced against the objectives of protecting the environmental quality of the area for existing residents and maintaining a diversity of uses needed to support a thriving economy?
2. How can Swindon Borough ensure short-term delivery of housing land while the larger, more complex urban extensions come forward.
3. What are the infrastructure constraints for future growth at Swindon and how can they be overcome.
4. Where should high quality employment land be delivered to support existing business growth and take advantage of inward investment opportunities?
5. How can planning policy support the advancement of the regeneration of Swindon's central area and the enhancement of its role, to improve the image of the town?

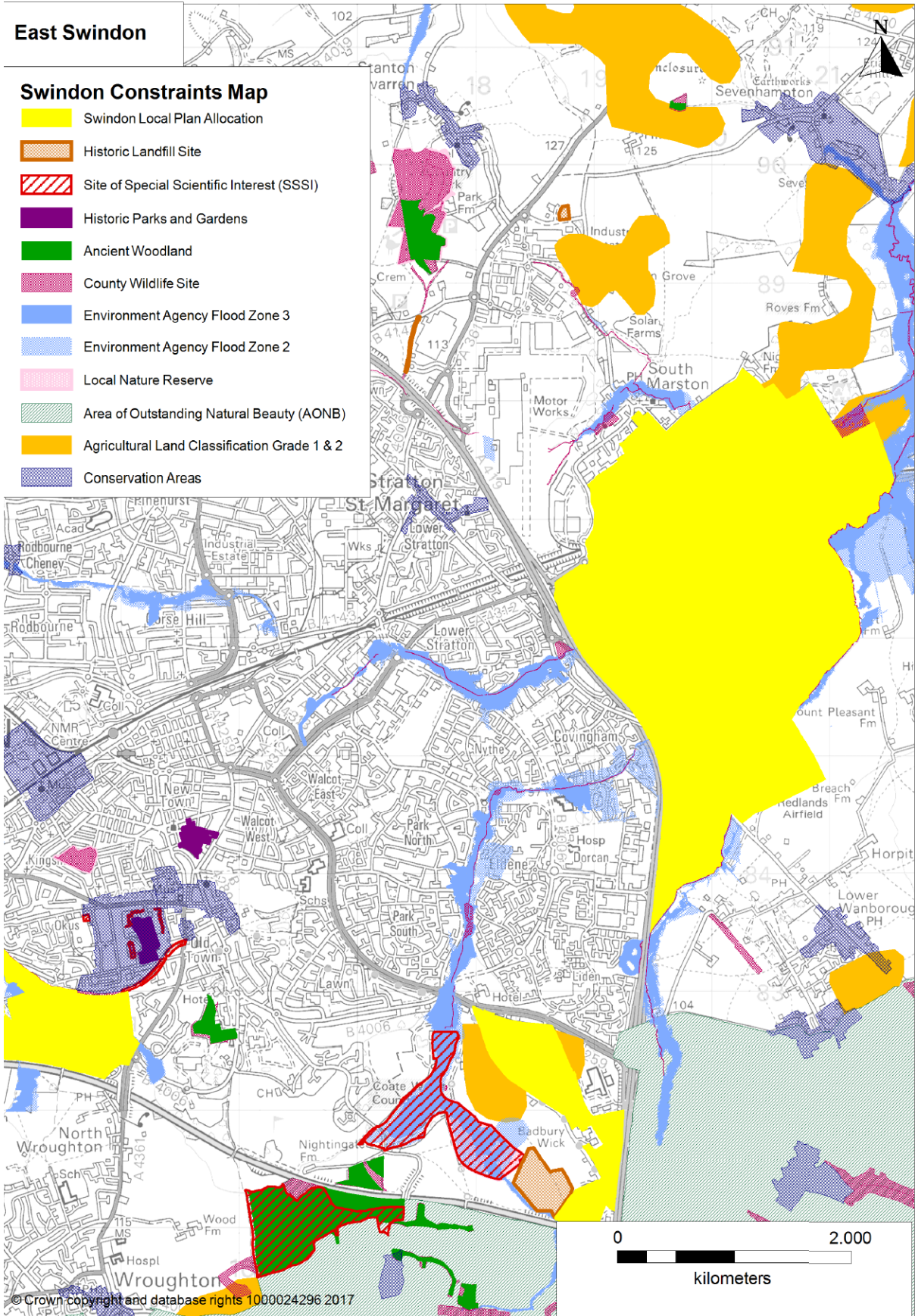




East Swindon

Swindon Constraints Map

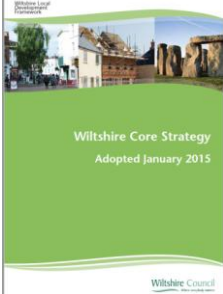
- Swindon Local Plan Allocation
- Historic Landfill Site
- Site of Special Scientific Interest (SSSI)
- Historic Parks and Gardens
- Ancient Woodland
- County Wildlife Site
- Environment Agency Flood Zone 3
- Environment Agency Flood Zone 2
- Local Nature Reserve
- Area of Outstanding Natural Beauty (AONB)
- Agricultural Land Classification Grade 1 & 2
- Conservation Areas



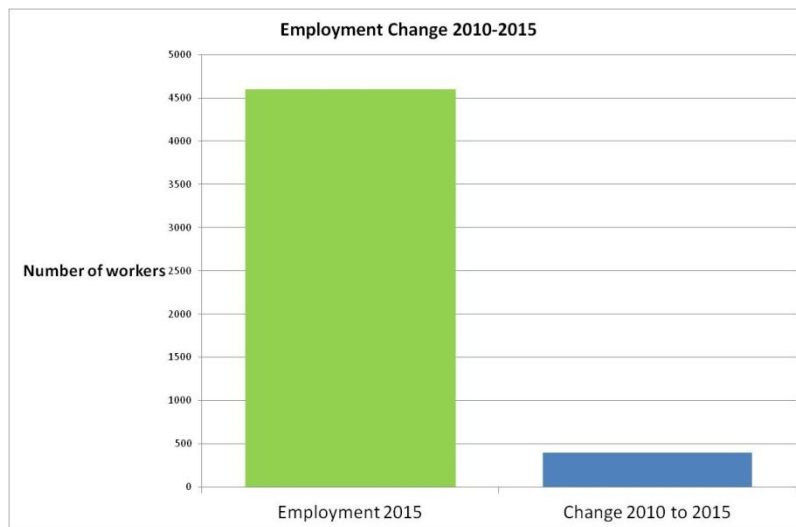
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Marlborough

The market town of Marlborough has a rich built environment with an attractive and thriving retail centre with a good amount of independent retailers. It is designated as a Market Town in the WCS.

| | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p>Wiltshire Core Strategy Adopted January 2015</p> <p>Wiltshire Council</p> | <p>The Wiltshire Core Strategy Vision</p> <p><i>“A modest and sustainable level of development within the Community Area will have provided for a range of housing appropriate to the local needs and incomes of residents. The Community Area will have continued to benefit from high standards of housing, health, education and culture in the context of a growing economy in the area as a whole. Development will have protected and enhanced the Community Area’s rich natural and historic assets including the Avebury element of the Stonehenge and Avebury World Heritage Site. The Kennet and Og Rivers and Savernake Forest will continue to provide social, environmental and economic assets to the area as part of a wider green infrastructure which will be used sustainably.”</i></p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Economy



Self-containment

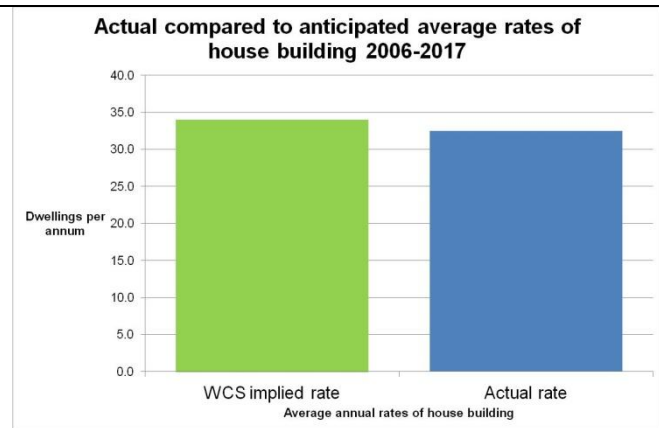
| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 50.8% | 49.4% | -1.4% |

The WCS allocates 3 ha of new employment land over the plan period. Marlborough is not identified as a location for new strategic employment growth. Since 2011, 0.1 ha of employment floorspace have been completed at the town.

Marlborough has a relatively small but strong employment base with a reasonable level of self-containment that has declined more slowly than other areas. The Marlborough Business Park has provided an important new location for employment growth and new business. The

town has some unusual employment patterns with a strong representation by the education sector and there is no indication that this sector will weaken. The WCS points to the town being overshadowed due to its proximity to Swindon and too far away to benefit from spin-off activity. This is confirmed by more recent work. Although Marlborough falls into the Swindon/M4 Corridor FEMA it is located on its southern extremity. The WCS concluded that due to its strong economic base and lack of current employment land supply, evidence identifies that there is likely to be some demand for new employment space over the plan period.

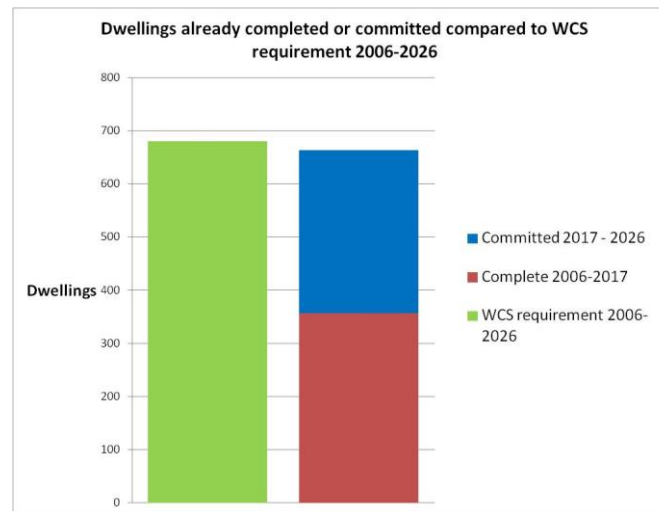
Town centre: The WCS states that the strategy supports Marlborough’s town centre to continue to function as a prominent retail centre within east Wiltshire and serve as a locally important employment centre; and that proposals for retail provision outside of Marlborough are likely to have an adverse impact upon the town centre. Any additional comparison retailing should be located within the town centre.



Housing

House building has been in accordance with anticipated rates. Land with planning permission for 175 dwellings west of Salisbury Road is a significant component of future housing supply.

Affordable housing was 15% of all homes built, substantially below target levels. The ratio of house price to earnings rose from 12.3 to 15.4 between 2011 and 2016. This ratio is the highest of all the settlements in Wiltshire.



Infrastructure

Transport: Through traffic detracts from the attractiveness of the town centre and harms air quality. Recent measures have focussed on encouraging cycling.

Schools: Primary provision has little or no capacity and caters for immediate forecast needs only. Primary schools do not have the potential to expand. This current “at capacity” situation for primary aged pupils is likely to feed through to the secondary level over the next 7 years to challenge capacity. Secondary provision already needs expanding. Expansion beyond

current forecast needs would require a feasibility study and land acquisition.

Neighbourhood Plan

An area designation for Marlborough Neighbourhood Plan was made in 2016. A number of working parties support the Steering Group working towards the submission of a draft plan to Wiltshire Council by summer 2018. The Steering Group is working to establish the housing and business needs of the plan area, the need for new or improved medical, educational and recreational facilities, the need to manage traffic and new car parking facilities, along with a focus on the use of the surrounding countryside and efforts to support nature conservation. Work has included a Housing Needs Survey, Business Survey and Car Parking Study.

Air Quality

An Air Quality Management Area (AQMA) covers the whole of the built up area and immediate surroundings. There are local concerns that further development will lead to mandatory limits being exceeded.

Constraints

See map.

The overall potential for significant urban regeneration is high. The settlement lies within an Area of Outstanding Natural Beauty. Great weight should be given to conserving the landscape and natural beauty. Important woodland and designated Historic Park and Garden abuts the town to the south east. Designated Sites of Special Scientific Interest are also located in close proximity to the town.

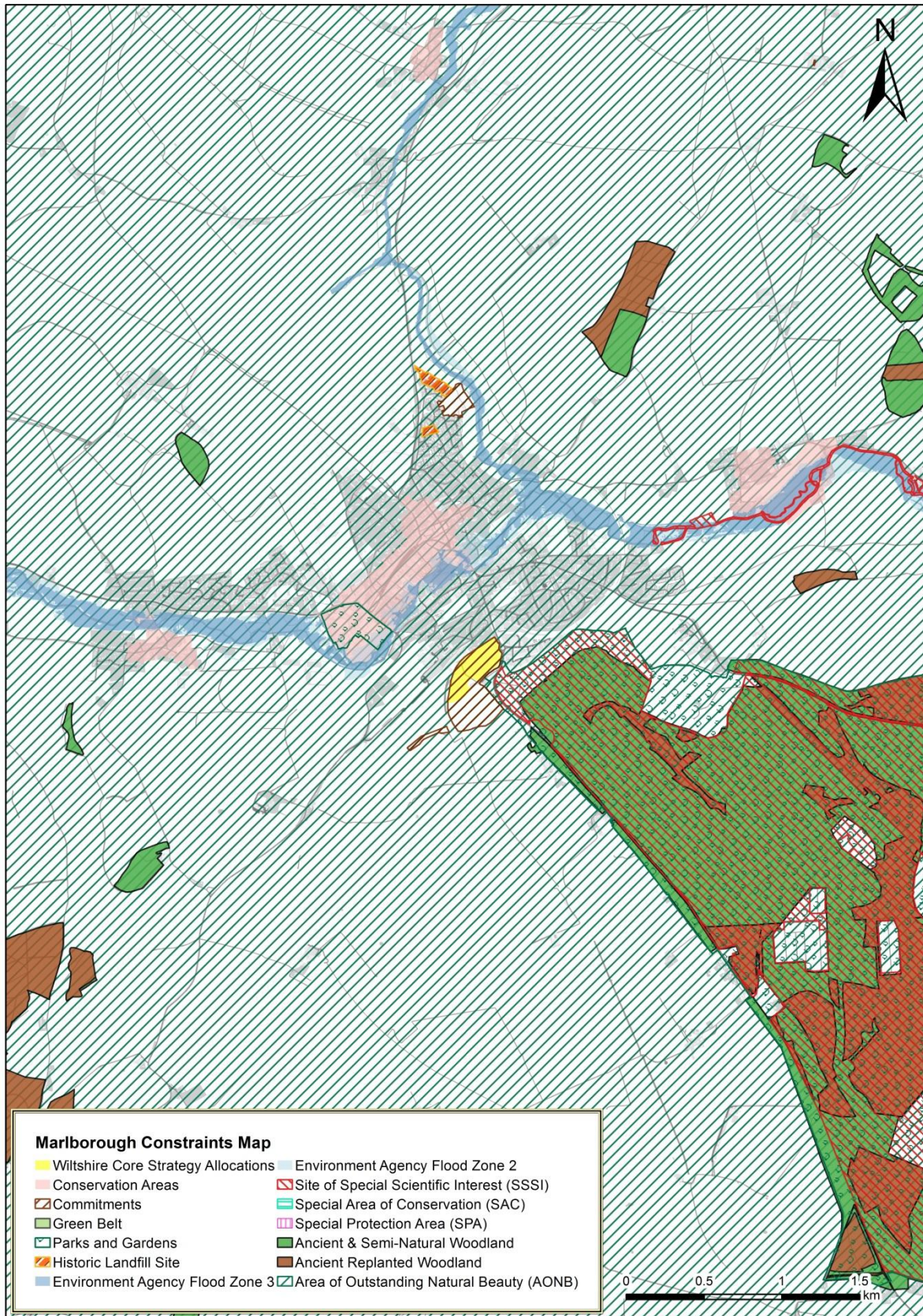
Settlement Strategic Issues

Key findings

- Expansion of the town is highly constrained by the priority to conserve the landscape and natural beauty of the Area of Outstanding Natural Beauty
- The affordability of housing is the worst in the County and relatively few affordable homes have been delivered
- Traffic congestion and air quality are significant local concerns

Issues

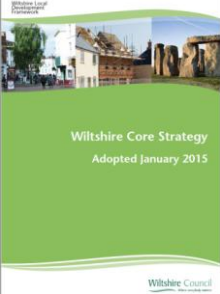
1. Should the current strategy continue or could some additional measures ensure more affordable homes and/or address traffic issues affecting the town?



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Royal Wootton Bassett

The historic market town of Royal Wootton Bassett is six miles from Swindon and has a dormitory role. The town currently has a diverse but smaller employment base than might be expected for a town of its size. It is designated as a Market Town in the WCS.



Wiltshire Core Strategy
Adopted January 2015

Wiltshire Council

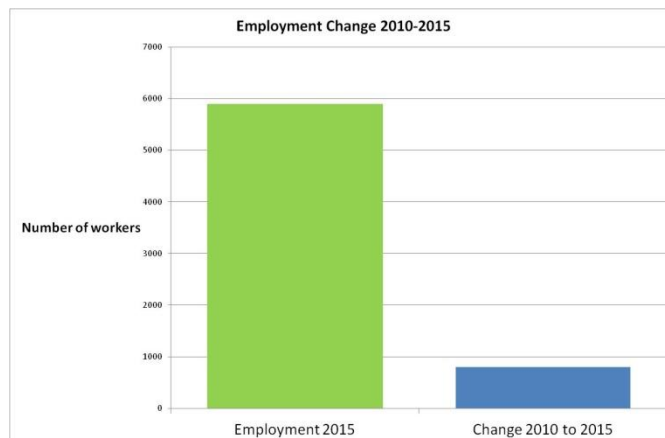
The Wiltshire Core Strategy Vision

“Royal Wootton Bassett will continue to function as the main service centre within the Community Area. Cricklade will perform a similar role, but with a more local focus.

The separate identity of both Royal Wootton Bassett and Cricklade and the villages, especially those closest to Swindon, will have been maintained and enhanced where appropriate. The retail offer of Royal Wootton Bassett will have been enhanced and the town will enjoy a good supply of housing including affordable dwellings. The town will have an appropriate level of facilities for its size, with a hub for sports provision at Ballards Ash. People within the Community Area will have access to a range of jobs within the towns, which will have helped to alleviate the existing high levels of out-commuting. Along with the Rivers Key and Ray, the restored and enhanced Cricklade Country Way will provide social, environmental and economic assets to the area as part of a wider green infrastructure network linking Cricklade with Swindon and the Cotswold Water Park, which will continue to be a valuable recreational resource for visitors and local communities.”

Economy

- Global digital businesses Plantronics and Dolby have an ongoing presence at Interface Park.
- Babcock International operates the training contract for Defence School of Electrical & Mechanical Engineering at nearby Lyneham.



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 39.2% | 35.9% | -3.2% |

The WCS allocates 5 ha of new employment land over the plan period including:

- Land to the West of Templars Way: 3.7 ha
- Brickworks, Purton 1.0 ha remaining

Since 2011, no employment floor space has been completed and 500m2 of employment floorspace remain committed as of 2017.

The town has a smaller employment base than might be expected for a town of its size. The WCS notes the settlement is located approximately six miles from Swindon and two miles from the M4, and as such is well located to develop into a more important employment centre. The town is identified as a location for new strategic employment growth, particularly to help reduce out-commuting, as the town currently has a dormitory role to Swindon.

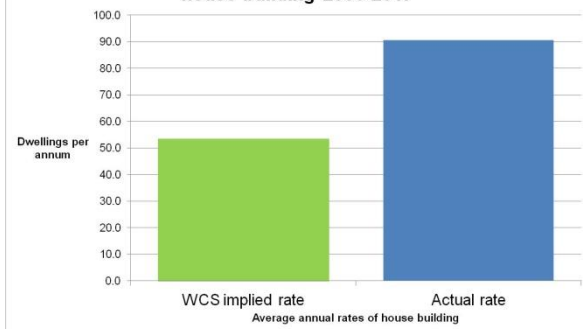
Town centre: The WCS states that Royal Wootton Bassett currently loses main food shopping trips to neighbouring towns. Although there is no quantitative need for additional convenience retail in the town, additional floorspace may be appropriate to address qualitative need and improve the retention of convenience trade if a suitable site is identified. There is limited capacity for up to 400 sq m of comparison retail in the town.

Investment to create a Defence School of Electrical and Mechanical Engineering at former RAF Lyneham is locally significant as it is just four miles to south west of the town.

The Neighbourhood Plan supports additional retail development in the town centre subject to meeting policy criteria on car parking, congestion and character/appearance.

The Wiltshire Council Retail Review (2015) confirms that there is no capacity for additional convenience goods floorspace, but a small capacity for comparison goods floorspace.

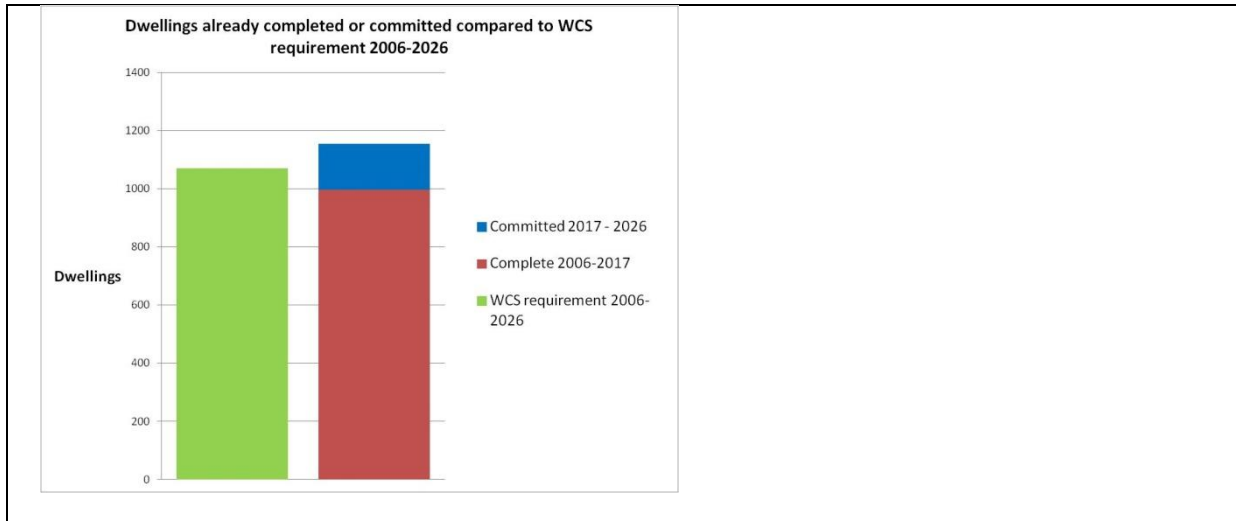
Actual compared to anticipated average rates of house building 2006-2017



Housing

House building has been substantially higher than anticipated rates. Nearly all the housing planned for 2006 to 2026 has already been built.

Affordable housing was 24% of all homes built, substantially below target levels. The ratio of house price to earnings rose from 8.6 to 10.4 between 2011 and 2016. This is below the average for settlements in Wiltshire.



Infrastructure

Transport: Commuting to and from Swindon evidenced by capacity issues at nearby junction 16 of the M4. There are also local concerns regarding the impacts of HGVs on the local road network. WCS supports provision of a railway station and additional development might raise this further as a priority.

Schools: Primary provision has no capacity and schools do not have the potential to expand. Growth would need to involve allocations large enough to provide new primary provision. The Secondary School has some potential to expand. A new secondary school in south Swindon may serve some local needs but the extent is unknown. Demand from Lyneham is a particularly difficult element in planning provision because of military movements into and out of the catchment.

Water Network: Wessex Water states that assets are predicted to require investment & capacity between 2025 – 2036

Neighbourhood Plan

The Royal Wootton Bassett Neighbourhood Plan was submitted to the Council in March 2017 and has yet to undergo independent examination and referendum. The draft Plan identifies a site for the development of up to 110 dwellings with integrated community facilities to serve its needs. The need for necessary community and transport infrastructure to keep pace with the town’s growth is a theme of the Plan and it identifies a set of infrastructure priorities. The Plan also safeguards the separate identity and character of the town and identifies an area east of the built up area to remain open and in agricultural use. The Plan identifies options for a new railway station and safeguards other areas for leisure and recreation uses.

Constraints

See map.

The overall potential for significant urban regeneration is high. There is a wide area of flood risk (zone 2) to the east, but there are relatively few environmental constraints compared to

other main settlements in the plan area.

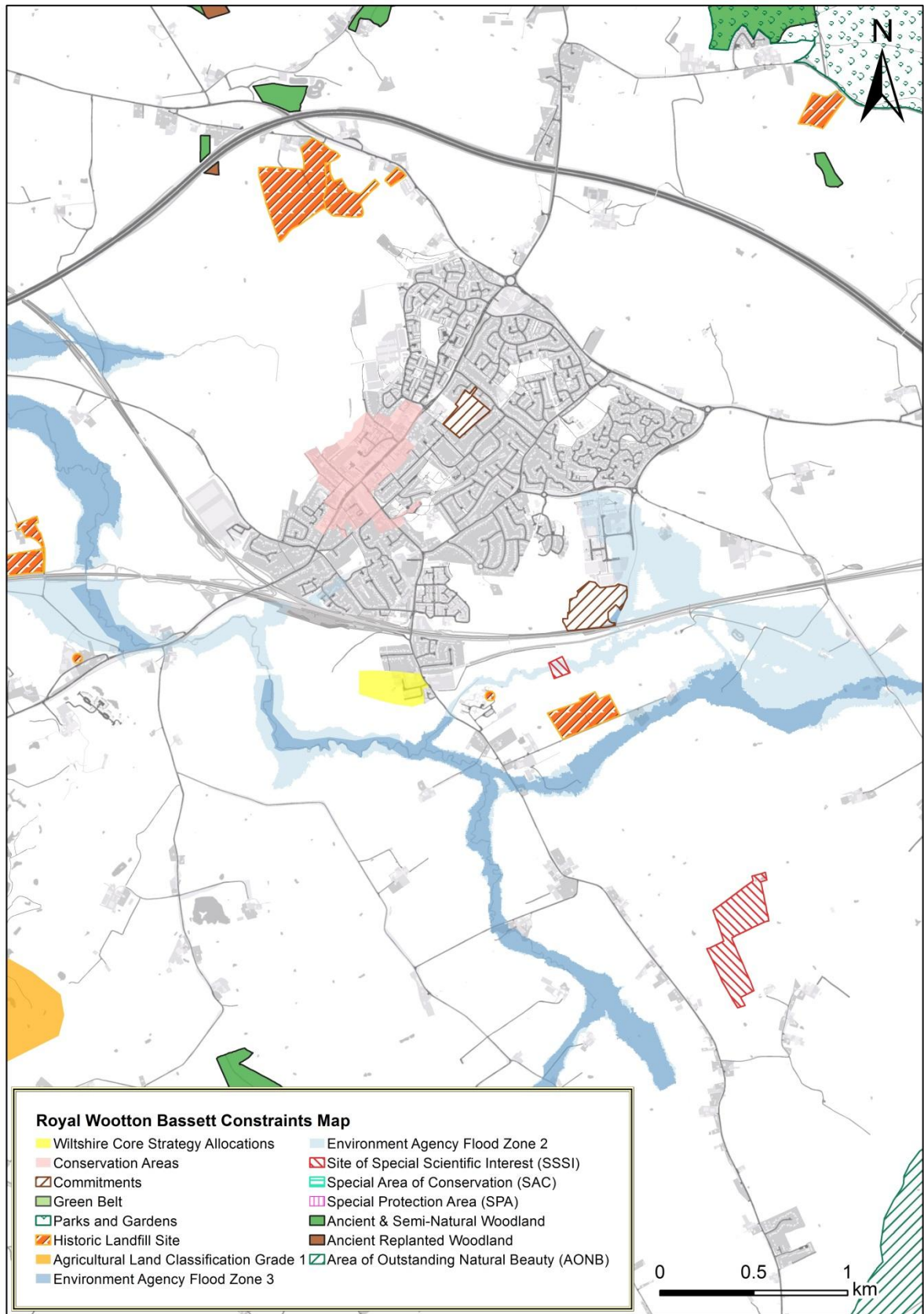
Settlement Strategic Issues

Key findings

- There have been high rates of housebuilding, but no significant development of employment land or significant inward investment
- The town as a low level of self containment indicating a pronounced dormitory role
- There is a need to retain the individual character and separate identity of the town
- Further expansion might need a scale sufficient to support a new primary school
- There is the potential to provide a railway station

Issues

1. The dormitory function of the town is increasingly pronounced, what is a realistic strategy and role for the future of the town?
2. How can more infrastructure, local services and jobs be provided?



Swindon Housing Market Area – Strategic Issues

The Swindon Housing Market Area is centred on the regional town of Swindon. This is reflected in commuting relationships, particularly between Royal Wootton Bassett and other smaller settlements within the HMA and Swindon.

Although the economy of the Swindon/M4 Corridor Functional Economic Market Area is relatively strong, recent growth has underperformed Wiltshire as a whole. This is reflected in an increase in out commuting from Swindon. Significant levels of new employment land are planned for in Swindon, but delivery issues have led to reported short-term shortfalls in high quality office and industrial land.

There are significant economic opportunities for the area connected with the electrification of the Great Western railway and the potential for new stations, including at Royal Wotton Bassett. There may also be growth opportunities connected with business clusters of knowledge intensive business services, pharmaceuticals and high-tech manufacturing in the FEMA. A significant drag on the economy of the FEMA remains the poor image of Swindon's central area, although regeneration is proceeding.

The Swindon Borough Local Plan 2026 sets an ambitious strategy of housing growth, centred on new communities on the periphery of the Swindon urban area. Although new house building at Swindon has been high in absolute terms, the rate of construction has not kept pace with the levels planned for in the Swindon Borough Local Plan for the period 2011-2026. This is principally due to delays in the building of several of the planned urban extensions, and it has resulted in a shortfall in five year housing land supply in comparison with the Swindon Borough Local Plan target. In consequence, central government policy's 'presumption in favour of sustainable development' has led to permission being granted for dispersed, unplanned housing development at the Borough's villages.

Thus, the levels of planning permissions and housebuilding in rural areas of Swindon Borough have exceeded the plan targets. Similarly, new house building at Royal Wootton Bassett has been high.

Marlborough, which lies within the North Wessex Downs Area of Outstanding Natural Beauty, has high house prices and an affordability ratio that is the highest of all settlements in Wiltshire. Low levels of housing affordability may also be experienced in other rural parts of the HMA, but the town of Swindon is comparatively affordable. Marlborough also faces air quality and environmental issues as a consequence of traffic.

Strategic issues for the HMA at this stage are:

- How much of the additional housing needs of the HMA could and should be planned for within and/or at the urban area of Swindon? How can this be balanced against the objectives of respecting the environmental quality of the area for existing communities and maintaining a diversity of uses needed to support a thriving economy? Is infrastructure a constraints to such growth?

- How can we deliver high quality employment land in the right locations to support existing businesses and take advantage of inward investment opportunities in the Functional Economic Market Area?
- What is the role of the market towns and other rural settlements within the Housing Market Area?

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Appendix 1: Part 5

Trowbridge Housing Market Area

**Individual Settlement and Housing Market Area
Profile**

DRAFT

Committee Draft

October 2017

Introduction

This document is one of four Housing Market Area Profiles which have been prepared to inform the Swindon and Wiltshire Joint Spatial Framework: Issues Paper. It provides an assessment of the main settlements in the Trowbridge Housing Market Area and the strategic issues they face. This is a first step to understanding the opportunities and constraints of growth before considering how each place could develop sustainably; whether its role continues as currently planned or how it should change.

In combination with profiles for the Chippenham, Salisbury and Swindon Housing Market Areas, this better understanding of our main settlements can inform the assessment of whether and how the housing and employment needs in each market area can be met.

The profiles contained in this document draw on existing published data sources such as the current understanding of the role and function of each main settlement, the 2011 Census, the Council's own monitoring reports and other local area documents such as neighbourhood plans.

Each profile presents a snapshot assessment of progress with the current strategy included in the Wiltshire Core Strategy, a picture of environmental constraints, the local community's vision (where there is neighbourhood plan) and the position from providers of underlying infrastructure (transport, water and education) which is essential to every settlement but which has the potential to also be a significant barrier to further growth.

The main findings for each settlement are summarised below followed by a set of issues specific to each settlement. These identify where the current development plan strategy may need to change. They are phrased as questions because the vital part of this stage in the Local Plan review is to invite community and stakeholder input on how the current strategy should change; what issues it should address and how future needs can be met by sustainable development.

Trowbridge Housing Market Area

The Trowbridge Housing Market Area (HMA) encompasses the area around the principal settlement of Trowbridge and the market towns of Bradford on Avon, Westbury and Warminster.



The 2017 SHMA identifies the need for housing in this market area over the period 2016-2036 to be 13,500 dwellings. This would represent an increase on the Wiltshire Core Strategy (WCS) period 2006-2026. The SHMA notes that demographic projections indicate a surplus of workers in the HMA.

The HMA lies within the A350 corridor and West/Central Wiltshire towns Functional Economic Market Area. The southern part of the HMA also lies within the Salisbury/Amesbury A303 FEMA.

The 2017 FEMAA states that the A350 corridor Trowbridge forms part of a greater westward focus towards Bath and the West of England. The employment forecast for the A350 Corridor FEMA suggests job growth of 13,800 in total for 2016-36, with the main growth occurring in

manufacturing, construction, business support services, and other services and residential & social. However, analysis suggests an over-supply of workers relative to jobs for 2016-36.

The FEMAA more specifically forecasts growth in B1 and B8 uses but decline in the B2 general industrial sector. The A350 FEMA requirement for 2016-36 is up to 21 ha of new land for office (B1) and 83 ha for industrial (B8). This means delivery of up to 1 ha and 4.2 ha per year respectively at the towns within this FEMA.

The FEMA is broadly consistent with the A350 Growth Zone identified in the LEP's Strategic Economic Plan (SEP). According to the SEP, the A350 Zone has seen the largest increase between all three growth zones in employees in Knowledge Intensive Businesses (25.7%) between 2012 and 2014. Overall the A350 Zone hosts 25% of all businesses within the LEP area.

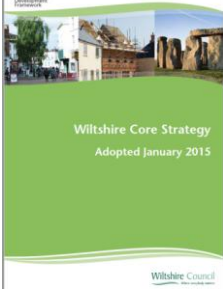
This equates to the following B use floor space requirements for 2016-36.

| Use class | Use | Floor space in m2 |
|-----------|----------------------------------------------------------|-------------------|
| B1a | Offices (other than financial and professional services) | 37,620 |
| B1b | Research and development | 32,950 |
| B1c | Industry that can be carried out in a residential area | 8,900 |
| B2 | General industry | 23,720 |
| B8 | Storage and distribution | 4,200 |

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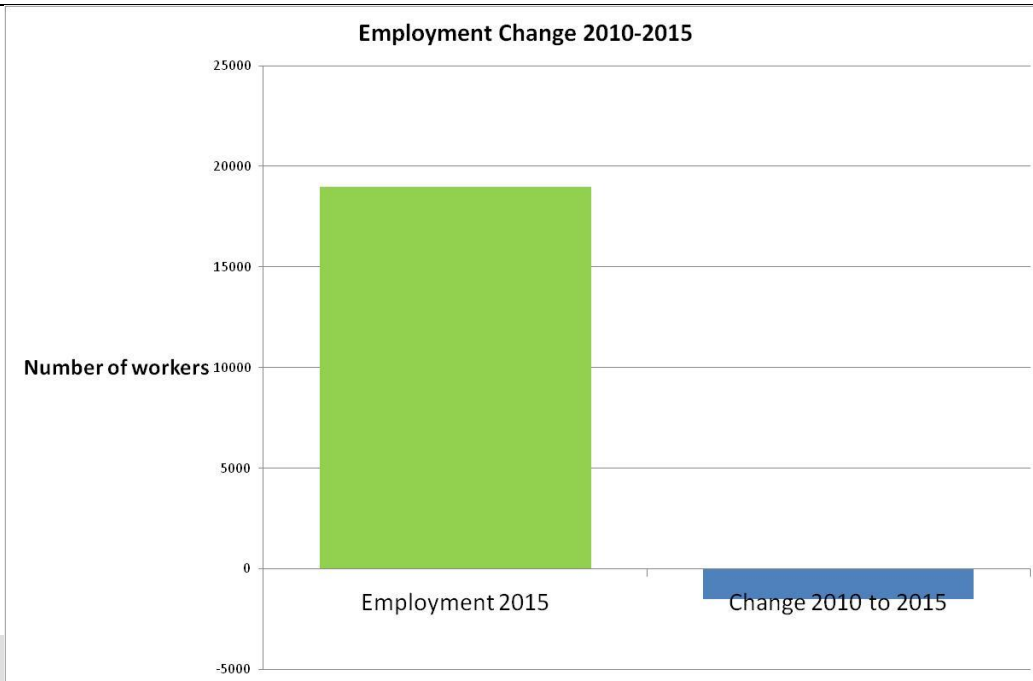
Trowbridge

Trowbridge has a strong industrial heritage and as the County Town of Wiltshire maintains an important strategic role. It is designated as a Principal Settlement in the WCS.

| | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p>Wiltshire Core Strategy Adopted January 2015</p> <p>Wiltshire Council</p> | <p>The Wiltshire Core Strategy Vision</p> <p><i>“The role of Trowbridge as an employment, administration and strategic service centre will be strengthened. The strategy for growth at the town will provide the catalyst for private sector investment into the town to deliver improved infrastructure. Improved entertainment, leisure and cultural facilities will have been developed alongside an enhanced retail offer within the central area. Strong linkages will be established between town centre and edge of town growth, with improved public transport integration and an attractive walk and cycle route via the River Biss corridor connecting regeneration sites. Significant and focused road infrastructure improvements will have been made to the A350 and the location of a new secondary school to the south east of the town will have helped to reduce cross town traffic. The attractiveness of the town centre will be substantially improved, in part through enhancements to the River Biss corridor. Significant growth in employment provision will have taken place at Trowbridge, helping to strengthen the town’s strategic employment role and this will consist of both town centre and edge of centre development. A range of new jobs will be created including office based employment opportunities.”</i></p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Economy

- Apetito will invest £31M in production capacity at its UK factory, safeguarding 100s of local food industry jobs for the long term.
- Hitachi CVS moved into its purpose built UK HQ offices and has continued to expand headcount.
- Automotive manufacturer DTR VMS moved its UK HQ and factory, and has continued to invest in the White Horse Business Park
- Global cosmetics manufacturer LF Beauty (600+ staff) has made ongoing investments at its UK plant.
- There is potential loss of employment space to residential at The Pavilions, former Virgin call centre.



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 59.4% | 51.1% | -8.3% |

The WCS allocates a total of 25 ha of employment land made up of:

- West Ashton Road (10 ha) site.
- Ashton Park Urban Extension (15 ha).

The Ashton Park urban extension does not have planning permission and requires significant road infrastructure to link it with the rest of the town.

Since 2011, there has been a net gain of 3.2 ha permitted and 0.09 ha completed. The 2011 ELR notes the commercial attractiveness of the West Ashton Rd site is 'average'. In 1998, the site had consent for 3.3 ha (B use floor space) but this not been delivered. This points to a continued trend of low rates for employment development.

Town centre: The WCS states that Trowbridge is well provided for in terms of its convenience retail offer but considerable opportunity for additional comparison provision. Future development should be focused in central locations. St Stephens Place has provided leisure development, improving the night time economy, and Cradle Bridge a site combining some retail and further leisure development. The development of these sites should support the regeneration of derelict parts of the town centre. Further regeneration opportunities exist at the former Bowyers and East Wing sites.

Wiltshire Council's Retail Review (February 2015) states that there will be an over-provision of convenience goods floor space in Trowbridge (-2,489sq m net by 2026). However the town is forecasted to still have a need for comparison goods retailing for approx. 7,000m² net by 2026.

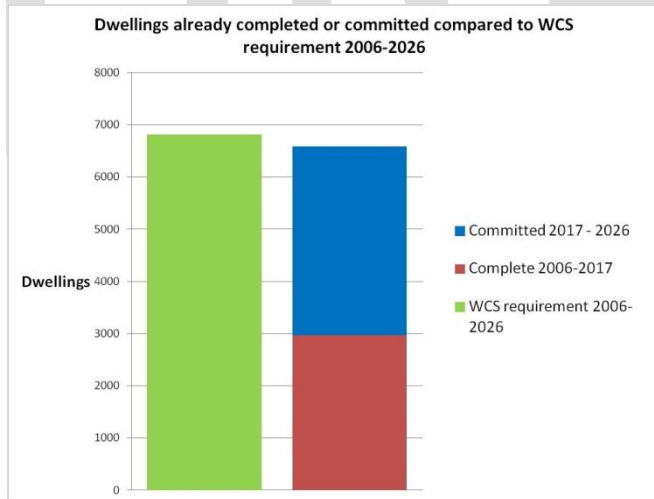
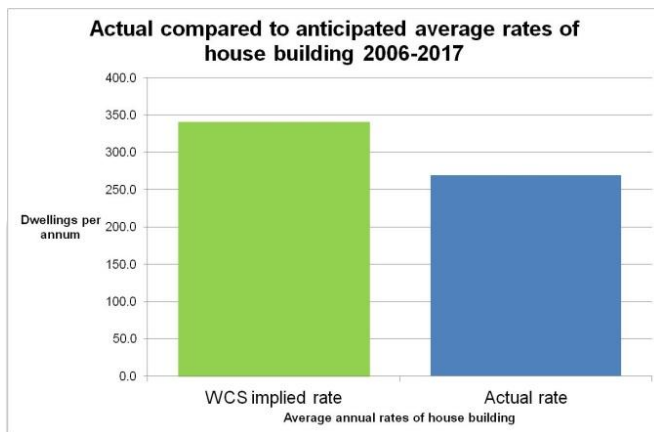
The 2017 FEMAA states that there is a net additional sq m floor space requirement of approx. 30,000m² for (A1), 980 (A2) and 9,200m² (A3-5) within the A350 FEMA for 2016-36. The study anticipates this growth accommodated primarily at town centres. With Trowbridge the largest town centre, findings support a need for additional town centre comparison goods retail investment.

Housing

A main reason for house building rates below those anticipated by the WCS has been the complexity and delay developing Ashton Park; a southeastern urban extension to the town for 2,600 homes.

A second reason for a shortfall has been an inability to identify enough land free from constraints that could compensate for the consequences of delay to Ashton Park.

Affordable housing was 42% of all homes built, in excess of target levels. The ratio of house price to earnings rose from 8.0 to 9.6 between 2011 and 2016. This ratio is below the average for settlements in Wiltshire¹.



Infrastructure

Transport: Redevelopment of the former Bowyers site provides an opportunity to further improve the railway station as a gateway to the town, along with better public transport integration. The existing junctions of the A350 at Yarnbrook and West Ashton are a main source of traffic congestion. Trowbridge Transport Strategy includes measures to support

¹ Average for main settlements in Wiltshire is 10.8

development to 2026 including a relief road for Yarnbrook and West Ashton. Future growth will increase peak hour town centre delays and exacerbate the existing capacity problems at Staverton. There is good scope for modal shift through improved walking, cycling and public transport, and demand management.

Schools: Growth would need to involve allocations large enough to provide new primary provision. The draft Housing Site Allocations Plan proposes a new primary school alongside housing development. The proposed Ashton Park secondary school site, as currently planned, has limited capacity to support further growth. Additional capacity would be required and this might justify a single larger school.

Water Network: Wessex Water state that investment is committed for 2019/20 for phosphate reduction and additional capacity and there are currently no plans for further investment.

Neighbourhood Plan

There is no neighbourhood plan under preparation for Trowbridge itself. At the outlying villages, the Hilperton, Heywood, Southwick, West Ashton and North Bradley neighbourhood plans are currently under preparation but none have yet reached a formal consultation stage.

Masterplan for Trowbridge (Consultation Draft October 2013)

The Masterplan is intended to inform planning decisions made within the built up area.

The vision outlines key opportunities within the town to enhance:

- The River Biss as an important feature and a key sustainable transport route.
- Trowbridge Park as an outdoor space; and
- The importance of local heritage assets, especially as means to support regeneration.

The masterplan outlines a number of 'opportunity sites' that are identified to deliver different land uses and infrastructure, plus other accessibility and environmental interventions. It includes a range of measures to help achieve these ends.

Constraints

See map.

The overall potential for significant urban regeneration is low, despite sites such as the former Bowyers site. Land east of the built up area is designated as green belt. Safeguards for protected bat species inhibit development on potential greenfield sites around the town. Urban expansion might impinge upon the separate identities and character of smaller settlements around the town.

Settlement Strategic Issues

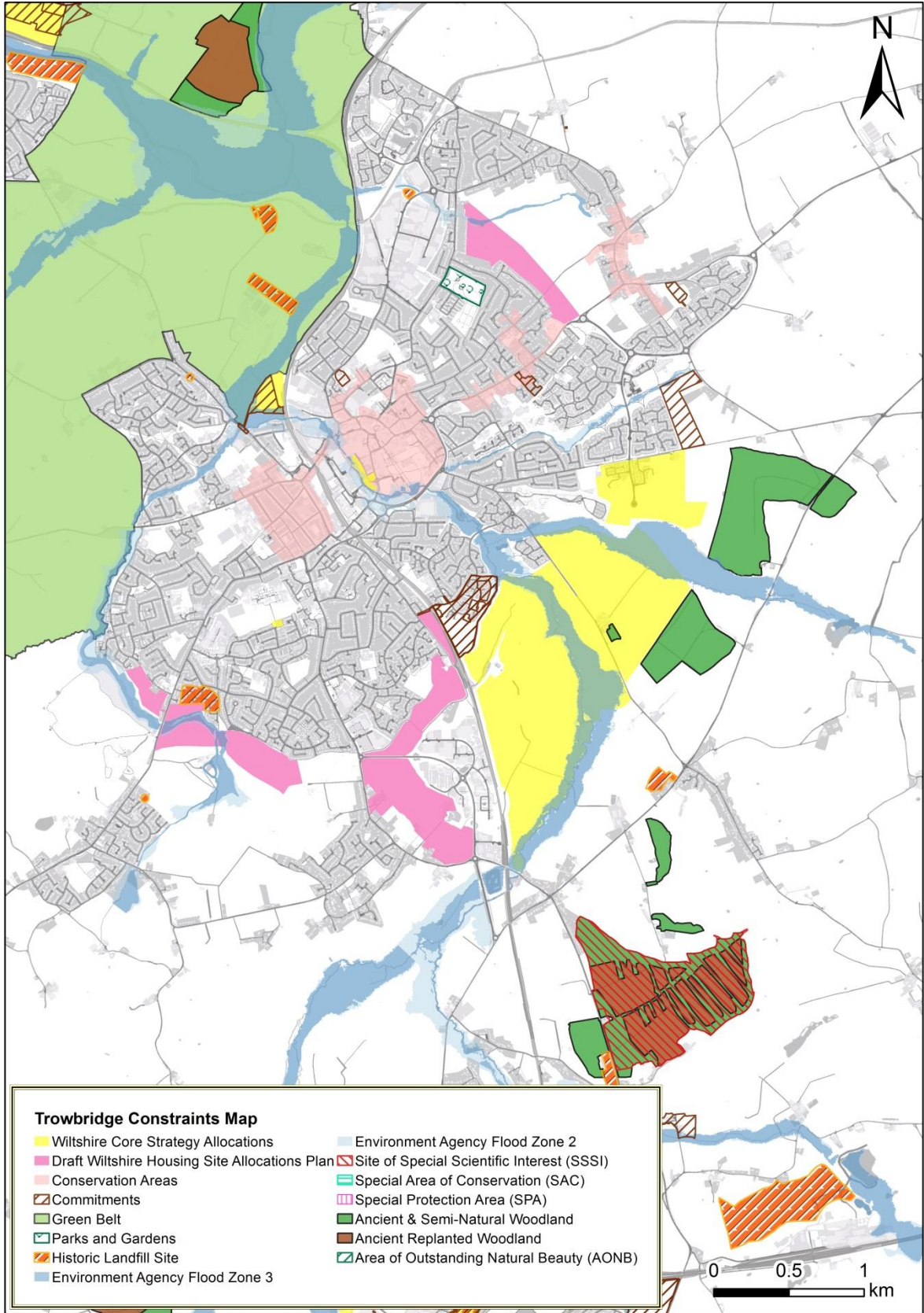
Key findings

- there has been much less employment development in the town than anticipated and the town's dormitory role was more pronounced in the 2011 Census
- key elements of the WCS such as a new secondary school, land for business investment and new homes have not yet been delivered
- there are significant environmental constraints and green belt protection
- town centre investment has focussed on leisure and convenience retail but much less comparison retailing

Issues

1. Is the town sufficiently attractive to inward investment to support its current role as a main focus for growth in Wiltshire? What could be done to improve its attractiveness?
2. Environmental constraints may limit potential for additional land for employment and housing, should the extent of the Green Belt be reviewed?
3. Are there further brownfield opportunities for redevelopment that can make significant improvement to the town and the vitality and viability of the town centre in particular?

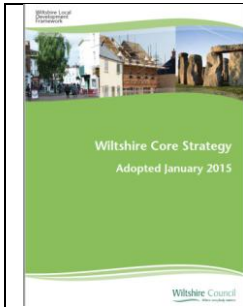
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Bradford on Avon

The historic town of Bradford on Avon is one of the smaller market towns in Wiltshire and located within the Bath-Bristol Green Belt. The town features a number of important historic buildings, along with leisure facilities such as the Kennet and Avon Canal and is a popular tourist destination. It is designated as a Market Town in the WCS.

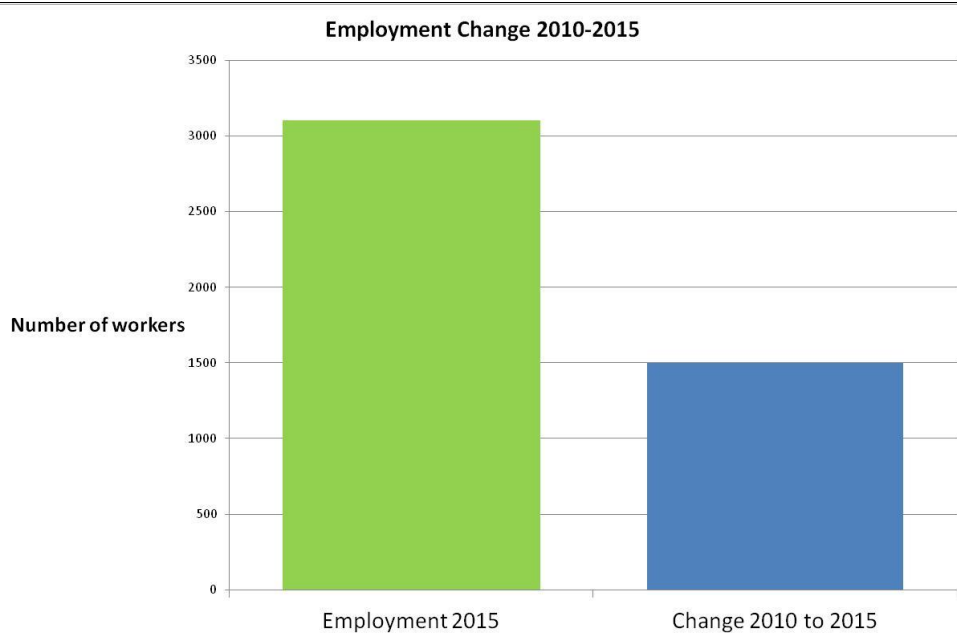


The Wiltshire Core Strategy Vision

“New development will have improved the economic self-containment of the Community Area by enhancing employment opportunities, improving services within the town and delivering an appropriate mix of affordable and market homes to help meet local need. Development will have had due regard to the historic built and cultural environment of the town and will meet high standards of sustainable design. Renewable energy provision, linked with new development, will have contributed to the Community Area’s aspirations to be carbon neutral. The natural landscape will also have been protected and enhanced. Congestion will have been reduced through the promotion and improvement of sustainable transport, including enhancements to the cycling and walking route network. The Kennet and Avon Canal and the River Avon will provide enhanced social, environmental and economic assets to the area as vital green infrastructure links with Bath and the wider countryside, and Barton Farm Country Park will have been maintained and enhanced as part of the wider green infrastructure network.”

Economy

- Antony Best Dynamics, automotive test systems developer is moving into new purpose-built premises in the town, enabling ongoing expansion with high-value AEM job creation.



Self-containment

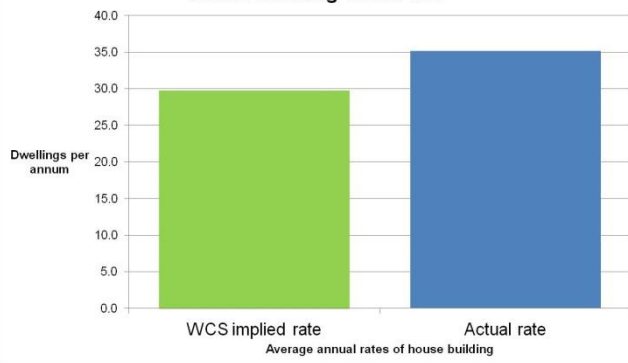
| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 44.1% | 39.8% | -4.3% |

Land at Kingston Farm provided 1 ha of the 2-3 ha intended in the WCS but 0.7 ha is linked to the relocation a business already in the town. In addition, it includes a work-hub with starter units. This will free up premises within the town and elsewhere. Additional employment land (0.3 ha) are permitted to the South of Cemetery Lane opposite Kingston Farm.

The 2011 Employment Land Review states that existing employment sites at Treenwood and Elm Cross are full, suggesting a shortfall and that additional sites should be allocated. Later data shows a concentration of employment in accommodation and catering. This is supported by more recent work on the Neighbourhood Plan. This refers to demand for premises from 57 existing businesses. The plan notes that there is a lack of small workshop space for technology and manufacturing.

Town centre: Wiltshire Council's Retail Review (February 2015) identifies a moderate demand for additional convenience goods floor space in the medium term. A slightly higher demand is forecasted for comparison goods. However, the study states that the level of capacity is relatively small and not sufficient to prompt the allocation of land for new development.

Actual compared to anticipated average rates of house building 2006-2017

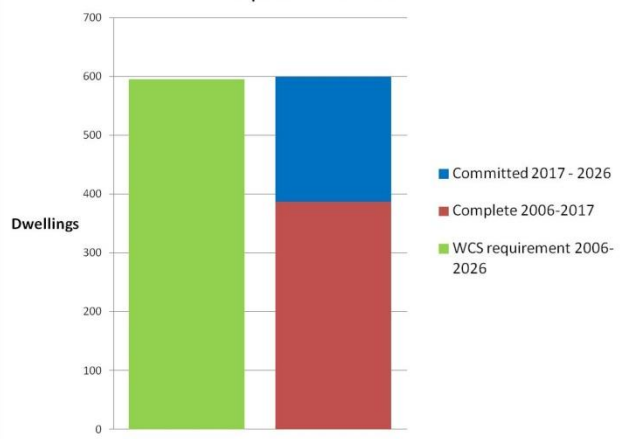


Housing

Affordable housing was 21% of all homes built. The ratio of house price to earnings rose from 10.8 to 13.8 between 2011 and 2016. This ratio is above the average for settlements in Wiltshire.

Population age structure is notably older than the Wiltshire average.

Dwellings already completed or committed compared to WCS requirement 2006-2026



Infrastructure

Transport: Traffic congestion harms air quality and the attractiveness of the town centre. Capacity is constrained by the single river crossing. A Historic Core Zone scheme was rejected and possible amendments or alternatives have yet to be produced. There is some capacity to encourage modal shift and greater use of the rail station and bus/cycle links to Trowbridge.

Schools: Primary provision has no capacity and schools do not have the potential to expand. The Secondary School is unlikely to be capable of expansion because of environmental constraints.

Water Network: Wessex Water states that assets are predicted to require investment to improve capacity between 2025 – 2036.

Neighbourhood Plan

The Plan identifies areas of opportunity at Trowbridge Rd and the Station area, which could provide mixed-use development and commercial development respectively. The Plan, however, notes a continued loss of employment land to housing.

The plan states that by comparison with many towns of a similar size and general character, Bradford on Avon has a relatively small retail footprint, relative shortage of parking and

proximity to the greater choice offered to consumers by Trowbridge and Bath. The town's retail offer is based on independent retail and marks it apart from other nearby towns. The food economy is growing with the continued success of existing restaurants and coffee shops.

The Neighbourhood Plan's Vision is amongst other to meet the challenge of climate change and achieve a carbon neutral Bradford on Avon by 2050. Climate Friendly Bradford on Avon seeks to make the Bradford on Avon Community Area carbon neutral by the year 2050 and achieve a 40% reduction in carbon emissions by 2020.

Air Quality

An Air Quality Management Area (AQMA) covers Market Street, Silver Street, Masons Lane and part of St Margaret's Street at the town.

Constraints

See map.

The overall potential for significant urban regeneration is low. Land surrounding the built up area is designated as green belt. A corridor of flood risk areas (zones 2 and 3) goes along the River Avon through the town.

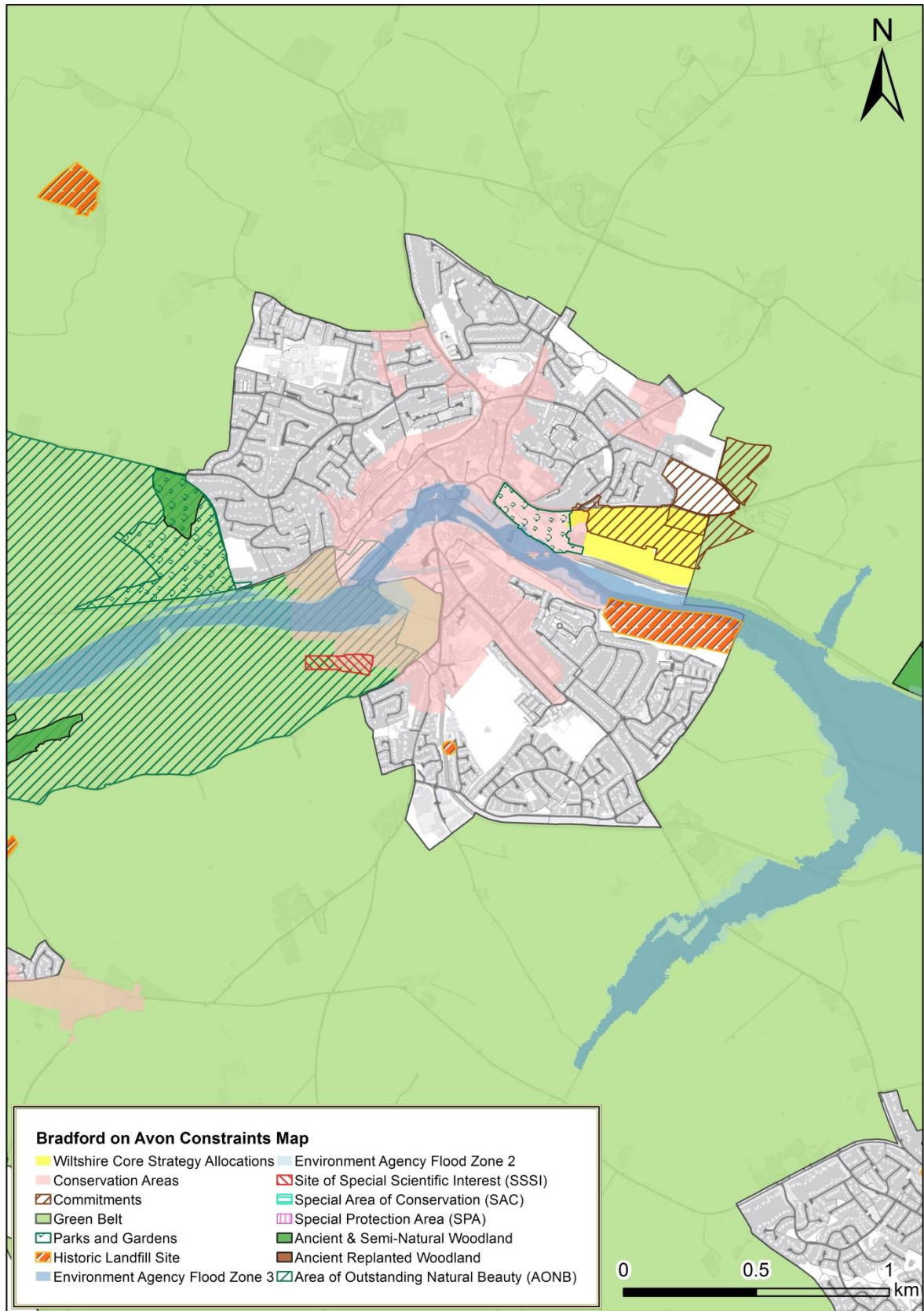
Settlement Strategic Issues

Key findings

- The local employment base has been harmed by the loss of employment land and there has been little significant inward employment investment. There is some diversification from increased work in accommodation and catering.
- Housing demand has exceeded WCS expectations but not achieved target levels of affordable homes.
- Traffic congestion in the centre of the town detracts from its attractiveness.
- Urban capacity is low and protection of heritage assets constrains scope for redevelopment. Urban expansion is restricted by green belt designation.

Issues

1. A restricted scope for development particularly limits potential for new employment and local affordable homes, should the extent of the Green Belt be reviewed?
2. Commercial floorspace is vulnerable to being lost to other uses, increased commuting worsens local air quality, how can the viability and vitality of the town centre be enhanced?



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Warminster

The historic town of Warminster is surrounded by a high quality landscape with Salisbury Plain to the east. It is designated as a Market Town in the WCS

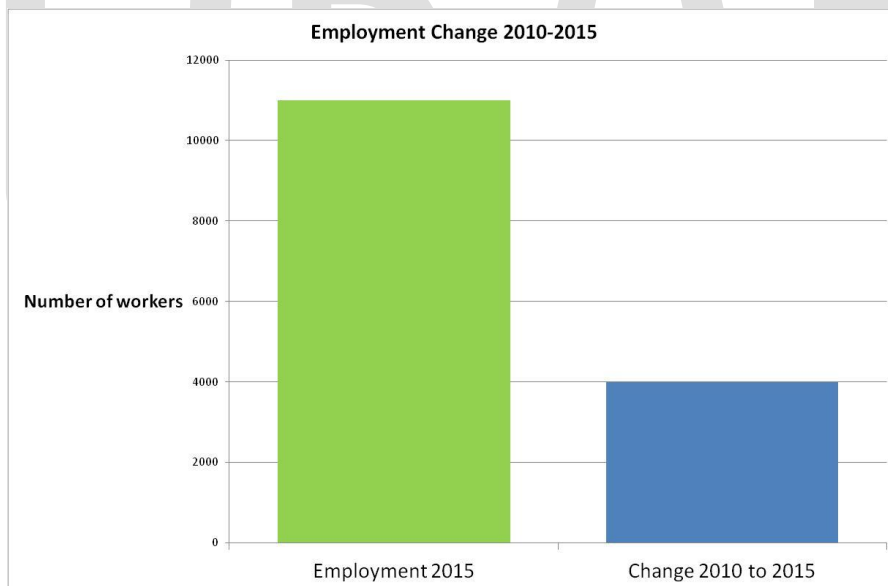


The Wiltshire Core Strategy Vision

“An increase in future housing in Warminster, compared to historic trends, will help facilitate the delivery of improved services and facilities in the town. The delivery of sustainable employment growth opportunities, alongside an appropriate mix of housing, will help improve the self-containment of the town and will strengthen the vitality and regeneration prospects for the town centre. Facilities for the young will have been improved. Warminster’s role as a service and employment centre for the surrounding rural catchment will have been enhanced. The River Wylye and the woodlands at Longleat Park will continue to provide social, environmental and economic assets as part of a wider green infrastructure network.”

Economy

- Longleat Enterprises plan to develop a major hotel/conference facility to augment core businesses – potentially significantly increasing their tourism/hospitality jobs.



Note: The Office of National Statistics has indicated that employment in Finance & Insurance is overstated in Warminster and this has given rise to the significant increase shown above.

Self-containment

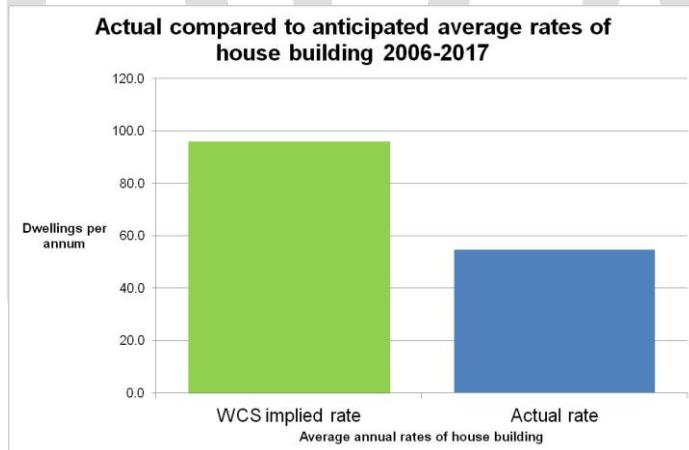
| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 57.5% | 51.7% | -5.8% |

The WCS allocates 6 ha of employment land at the West Warminster Extension, for which a masterplan has been agreed, is currently subject to a pending planning application.

In terms of new employment floorspace, 1 ha of has been permitted and 0.4 hectares t have been completed since 2011. There is a total of 2.5ha with consent as of 2017.

The Neighbourhood Plan states that both Crusader Park and Warminster Business Park are not operating at full capacity. Woodcock Industrial Estate is in need of urgent upgrade and it is considered to be run down.

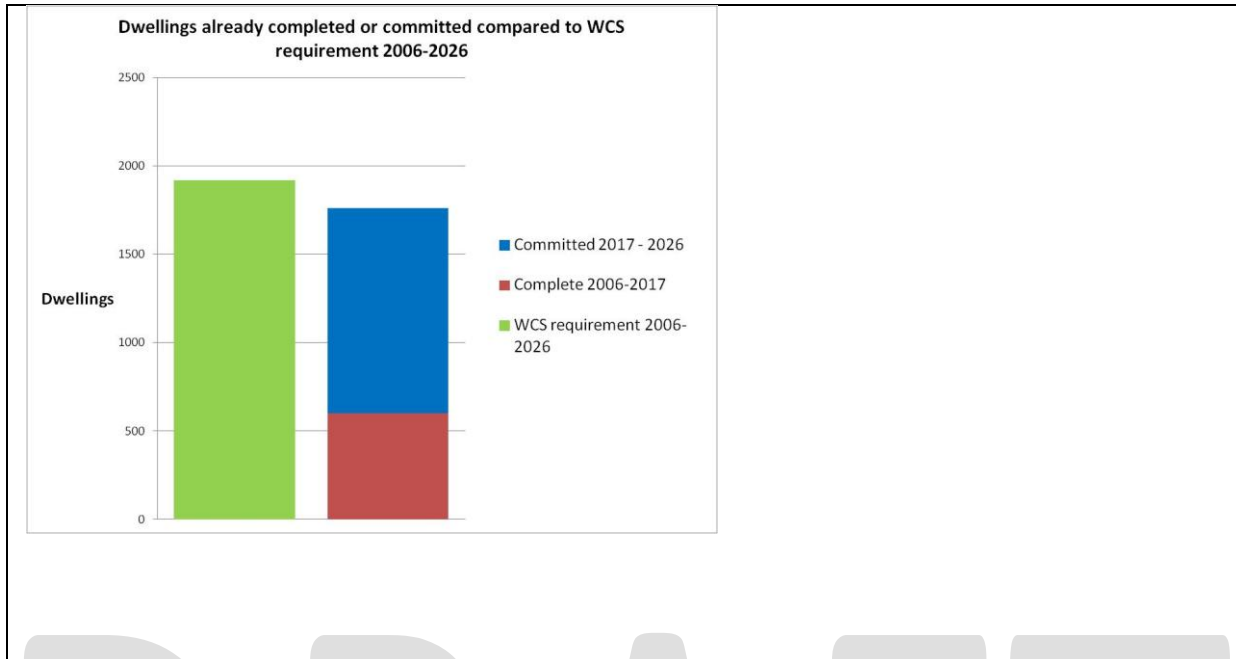
Town centre: The WCS suggests regeneration that encompasses the provision of suitable premises for larger format comparison retailers; rationalisation of parking provision; improvements to public transport connectivity and improved pedestrian linkages. The GVA Grimley Study (2015) states that there is catchment capacity for up to 2,000m² (net) of comparison goods floorspace required by 2026. The Neighbourhood Plan's town centre regeneration policy links with its strategy (see below).



Housing

House building has been below anticipated rates. One reason has been the complexity and resulting delay delivering the West Warminster Extension. Master planning for the site, however, indicates the site can accommodate significantly more homes than set out in the WCS. The town has a significant supply of land now already permitted or allocated.

Affordable housing was 55% of all homes built, in excess of target levels. The ratio of house price to earnings rose from 8.2 to 9.0 between 2011 and 2016. This ratio is below the average for settlements in Wiltshire.



Infrastructure

Transport: Town already has a bypass and good rail connections. Cross-town journeys, in particular travel to and from the secondary school, are a source of congestion. Some scope for modal shift on these local journeys through walking/cycling and bus improvements.

Schools: Further growth beyond what is already planned would need to involve allocations large enough to provide new primary provision. Military personnel are likely to take any short-term capacity in the primary sector. The town's secondary school is at capacity with no room to expand. Continued growth would be likely to require a new secondary school site of substantial size to accommodate the large school.

Water Network: Wessex Water state that investment is committed for 2020/21 mainly to bring about phosphate reduction and that further investment will be likely to be required to improve capacity between 2025 – 2036.

Neighbourhood Plan

The Warminster Neighbourhood Plan was made in November 2016. It envisages the town entering a period of growth and guides development. It seeks to retain existing employment sites supporting new start up and the expansion of existing business. It also allocates two local green spaces and contains proposals to enhance youth-related facilities. It has a particular focus on the regeneration of the town centre and options involving the redevelopment at the central car park.

River Avon Nutrient Management Plan

The Nutrient Management Plan aims to reduce and manage phosphorus levels in the River Avon Special Area of Conservation (SAC), in accordance with international obligations, principally in the EU Habitats, Wild Birds and Water Framework Directives. It will also help to

facilitate development and change in the catchment of the river by ensuring that they do not add to the phosphorus load in the river in a way that might conflict with the conservation objectives for the SAC. The Plan includes an 'ambition target' for phosphate levels by 2021, an interim step to achieving favourable status. The Plan is currently under review.

Constraints

See map.

The overall potential for significant urban regeneration is high. A designated Area of Outstanding Natural Beauty lies to the south and west and land in military use around the town as well as the A36 create man-made barriers to urban expansion. Flood risk and surface water management issues are potential obstacles to development. Further development may also risk raising phosphate levels in the River Wyle to levels that have adverse effects on the River Avon SAC.

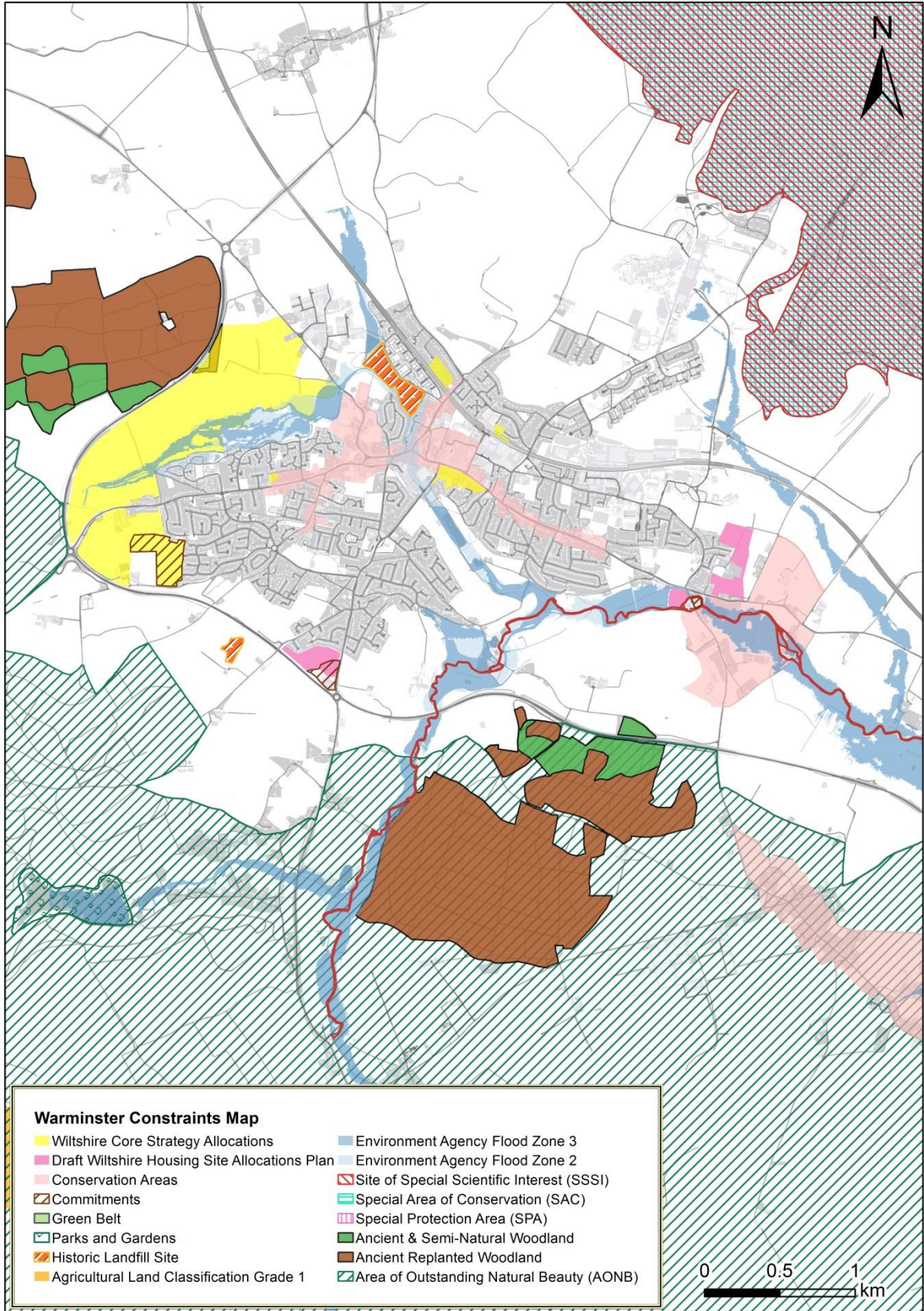
Settlement Strategic Issues

Key findings

- an increase in rates of house building has yet to materialise. However the West Urban Extension has greater capacity than set out in the WCS
- there are significant environmental constraints to further outward development
- growth might prioritise regeneration within the town
- new secondary school provision is required to underpin growth

Issues

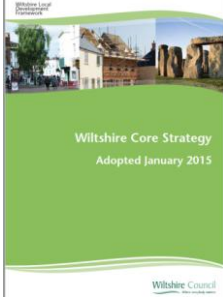
1. Where should the focus for growth be at Warminster alongside the West Urban Extension?



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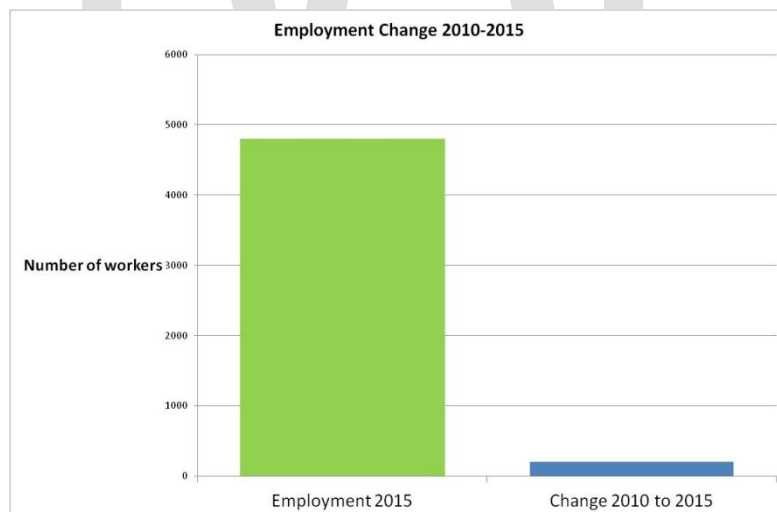
Westbury

Westbury is an historic market town located in the west of Wiltshire between Trowbridge and Warminster. It is designated as a Market Town in the WCS.

| | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p>Wiltshire Core Strategy Adopted January 2015</p> <p>Wiltshire Council</p> | <p>The Wiltshire Core Strategy Vision</p> <p><i>“Housing development will be at a reduced rate compared to the past with a focus on improving and consolidating the town’s infrastructure and services. Public transport will be more integrated, particularly with improved linkages to the railway station and the industrial sites to the north of the town. Housing growth on a strategic allocation at Station Road will have helped to deliver public realm enhancements, particularly around the railway station, and deliver a new rail crossing. Town centre improvements will have been delivered with strengthened linkages and public realm. The important strategic role of employment provision in Westbury will be maintained and expanded. The scarp of Salisbury Plain including the White Horse will continue to provide social, environmental and economic assets to the area as part of a wider green infrastructure network which will be used and managed sustainably.”</i></p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Economy

- Global paper manufacturer Welton Bibby & Baron relocated into the county, refurbishing and expanding premises at WWTE, bringing 300+ jobs; other investments included increased capacity at Arla Westbury Dairies, and the adjacent Hills Group MBT Plant (waste recycling) .
- Hawkeridge Business Park now has infrastructure connected and offers major job creation opportunities as a strategic employment location.



Self-containment

| | 2001 | 2011 | change |
|---------------------------------------------|-------|-------|--------|
| % of employed residents working in the town | 45.5% | 36.8% | -8.7% |

The WCS allocates Land at Mill Lane, Hawkeridge for 14.7 ha and North Acre Industrial Estate for 3.8 ha. Land at Mill Lane, Hawkeridge forms an extension to West Wiltshire Trading Estate that has been almost fully developed.

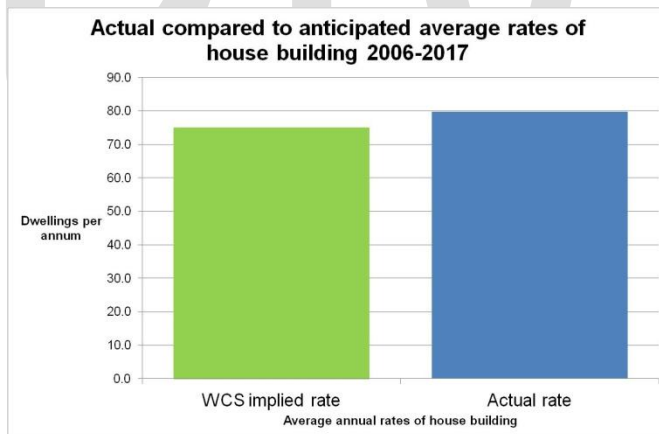
Since 2011, 8.3ha has been permitted of which 4.6ha has been completed. The largest completion (3.2 ha) retains an existing business. The largest committed sites (not implemented) are at Cory Way (West Wilts Trading Estate) for 0.8 ha floor space of B-use, and for 0.7 ha of B use space at Hawkeridge Business Park. A number of smaller permissions complement the picture.

The 2011 Employment Land Review suggests that land supply meets anticipated needs to 2026 and that Westbury fulfils a complementary role to Trowbridge providing space for employment, should it not come forward at Trowbridge as planned.

Town Centre: The WCS confirms that any large format retail expansion in Westbury is not appropriate, with the focus instead being on protecting the existing independent sector and enhancing the town centre with stronger linkages between areas which currently feel fragmented and by improving the public realm. The redevelopment of the High Street precinct will be supported, providing this incorporates high quality design, is sensitive to the historic character of Westbury and will clearly enhance and strengthen the existing independent retail sector in the town.

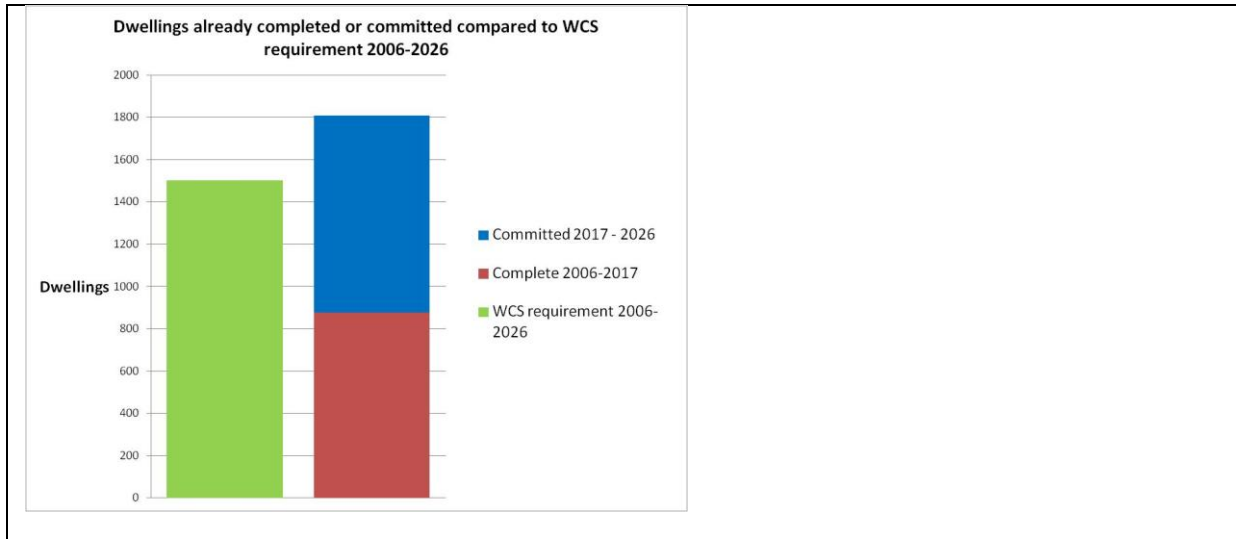
The Wiltshire Council Retail Review (2015) identifies no additional capacity for convenience retail at Westbury which conforms to the WCS strategy. There will be a small capacity for additional comparison goods retail by 2026 (406 sq m net).

Housing



House building has been slightly higher than anticipated rates. The town has a significant supply of land already permitted or allocated. This exceeds current requirements to 2026.

Affordable housing was 39% of all homes built, consistent with target levels. The ratio of house price to earnings rose from 8.2 to 10.3 between 2011 and 2016. This ratio is below the average for settlements in Wiltshire.



Infrastructure

Transport: Traffic along the A350 through the town centre detracts from the attractiveness of the town centre, causes congestion and harms air quality. Industrial sites are detached from the town and need links to be improved. Development around the railway station would improve a gateway to the town and may help to alleviate traffic on Oldfield Road. There is some scope for modal shift on local journeys through walking/cycling and bus improvements, especially for trips to the railway station.

Schools: Continued growth beyond 2026 would need additional primary school provision. Further planned expansion of a primary school is needed to meet demand from existing known housing. Beyond that a new primary school will be required. Secondary school accommodation could possibly be extended, but not to any significant degree.

Water Network: Wessex Water state that investment is committed for 2019/20, mainly to improve phosphate reduction and that further investment will be likely to be required to improve capacity between 2025 – 2036.

Neighbourhood Plan

The Westbury Neighbourhood Plan Area covers the parish of Westbury as designated in April 2017. At the outlying villages, the Heywood and Dilton Marsh neighbourhood plans are currently under preparation but have not progressed sufficiently to be of material weight.

Constraints

See map.

The overall potential for significant urban regeneration is high. Compared to other settlements in the HMA, land around the town does not have significant or extensive environmental constraints. The main land allocations for employment are, however, quite detached from the main urban area.

Settlement Strategic Issues

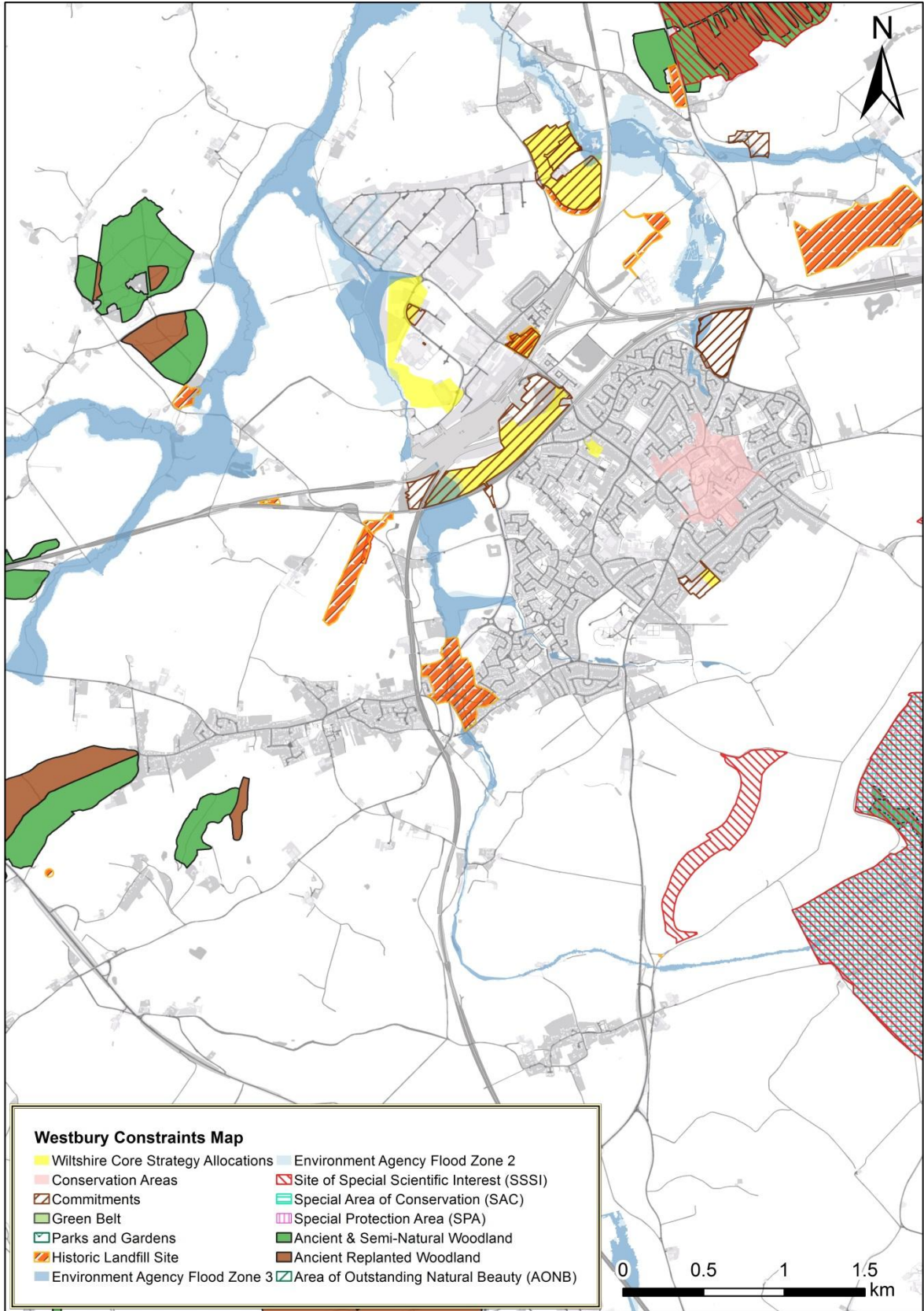
Key findings

- The rate of housing development has slowed as intended although there is land already committed that could exceed the WCS indicative requirement if it was all developed by 2026
- Employment land provision has played a strategic role whilst development in Trowbridge has been delayed
- Improvements within the town, around the railway and to the town centre have not yet taken place
- The potential for development around the town is comparatively unimpeded by environmental constraints

Issues

1. Should Westbury become a greater focus for growth or maintain a strategy of consolidation?
2. How can improvements to the town centre and around the railway station be brought forward? What other measures could enhance the vitality and viability of the town centre and improve local infrastructure?

DRAFT



Trowbridge Housing Market Area – Strategic Issues

Settlements in the Trowbridge HMA have experienced the most marked reduction in self-containment over the period 2001 to 2011. Studies point to relationships between the settlements, such as by business development at Westbury reacting to restricted supply at Trowbridge. Relationships with other settlements further afield also need to be examined to better understand commuting patterns.

Important elements of the WCS have not come to fruition at the pace originally envisaged; some because of their complexity (Ashton Park and West Warminster Urban Extension). This has affected both greenfield and some brownfield sites.

Strategic issues for the HMA at this stage are:

- The SHMA suggest a modest increase in housing needs, but a surplus workers compared to jobs within the area, should housing needs be met in the HMA? And if not where else?
- Should the extent of the green belt be reviewed to enable development needs to be met?
- What are relationships (1) between settlements within the HMA and (2) with settlements outside; and how might transport infrastructure attract inward investment or influence commuting patterns?

APPENDIX 2

Wiltshire Local Plan Review Position Statement

What is the Wiltshire Local Plan?

Local plans set out a vision and framework for the future development of an area; meeting needs and realising opportunities in relation to housing, the economy, community facilities and infrastructure. They are also the means to protect the environment, adapt to climate change and secure good design. By law, they are the basis upon which decisions are reached for individual development proposals that require planning permission.

The Wiltshire Local Plan comprises adopted planning policy documents drawn up by Wiltshire Council, which in combination plan for the future development of the local area. They are prepared in consultation with the community. The Wiltshire Core Strategy, policies of the former district councils saved under the 2004 Act¹, the Chippenham Site Allocations Plan and various mineral and waste plans currently form the Wiltshire Local Plan.

Why are we reviewing the Wiltshire Local Plan?

Having up to date local plans in place promotes sustainable development and ensures the Council can shape growth to serve the wider public interest.

National planning policy contained in the National Planning Policy Framework (NPPF) states that local plans should be '*drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date*' (paragraph 157). The adopted Wiltshire Core Strategy and the Chippenham Site Allocations Plan have time horizons of 2026 which is only 9 years away, less than the preference expressed in the NPPF. The Wiltshire Local Plan Review will provide an opportunity to roll forward the time horizon of the Wiltshire Core Strategy to 2036 more in line with the preference expressed in the NPPF.

Furthermore, the former district local plans were only originally intended to be in place until 2011. Many policies have simply been rolled forward until they are replaced by consistent policy across Wiltshire.

The Wiltshire Local Plan Review will complete the review of all saved policies and ensure consistency of planning policy across Wiltshire. The review will also enable adopted local plan policies to be reviewed in the light of more recent changes to national planning policy and guidance to improve conformity.

¹ Planning and Compulsory Purchase Act 2004

What is the scope of the Wiltshire Local Plan Review?

The proposed scope of the review is set out in the Wiltshire Local Development Scheme Update 2017 and reproduced below.

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

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

The review will also include:

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

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

What is the Wiltshire Core Strategy?

The Wiltshire Core Strategy (WCS), adopted January 2015, provides a positive and flexible overarching planning policy framework to guide development across Wiltshire for the period up to 2026. It is required to be consistent with national planning policy - the National Planning Policy Framework (NPPF) and supporting Planning Policy Guidance (PPG).

The core strategy sets out county wide policy and replaced many, but not all, of the policies within the former district local plans for Kennet, North Wiltshire, Salisbury and West Wiltshire.

Are adopted policies consistent with national planning policy?

An assessment has been carried out of the existing 'saved' policies of the former district councils and county wide policies in the Wiltshire Core Strategy against advice in the NPPF. The purpose of the assessment was to find out if there are 'gaps' in certain areas of policy compared to the requirements of the NPPF.

This work began in 2015 when two papers were prepared and consulted upon as part of a consultation on the scope of the then proposed partial review of the Wiltshire Core Strategy. The work carried out then has been reviewed to ensure it is up to date and in accordance with latest policy and guidance.

Tables 1 and 2 set out the issues identified through the analysis which are explored in more detail in **Appendix 1**. For each identified issue, Appendix 1 summarises the work completed as part of the 2015 Partial Review and how this is proposed to form the basis for the 2017 Wiltshire Local Plan Review. Colour coding is used in accordance with Table 1 for ease of reference.

Table 1: Issues arising from an assessment of ‘saved’ policies of the former district council local plans

| Ref | Issue |
|-----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Strategic Objective 1 – Delivering a thriving economy | |
| PR1 | Telecommunications, especially with respect to the design of larger installations |
| PR2 | Retail and town centre planning policies to include the defining or redefining of primary and secondary shopping frontages, primary shopping areas and town centre boundaries |
| PR3 | Retail and town centre uses; site allocations if need is identified |
| PR4 | Farm Diversification, equine facilities and change of use and development and buildings to meet the requirements of agriculture |
| PR5 | Employment allocations |
| Strategic Objective 2 - Climate change | |
| | No issues identified in relation to review of saved policies |
| Strategic Objective 3 – to provide everyone with access to a decent, affordable home | |
| PR6 | Replacement of existing dwellings in rural areas |
| PR7 | Temporary Housing for Rural Workers |
| PR8 | Extensions to dwellings and buildings in the countryside |
| PR9 | Accommodation for dependent persons |
| PR10 | Flat Conversions |
| PR11 | Housing allocations |
| PR12 | Empty Homes |
| Strategic Objective 4 – helping to build resilient communities | |
| PR13 | Location of /permissive exceptions policy on education and community facilities Including playgroups, day nurseries, child minding facilities, health, social services, places of worship, community halls, indoor and outdoor sports and recreation facilities and cemeteries. |
| PR14 | Community facilities allocations |
| PR15 | Health and Wellbeing |
| PR16 | Public safety from major accidents |
| Strategic Objective 5 – Protecting and enhancing the natural, historic and built environment | |
| PR17 | Enabling Development |
| PR18 | Disabled Access |
| PR19 | Design of shop fronts |
| PR20 | Trees, woodland and tree planting schemes |
| PR21 | Open space and recreation policies to include the facilitation and future management of open space and recreational assets and to justify the |

| | |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| | collection of developer contributions / CIL towards open space provision |
| PR22 | Hazardous Substances/Noise and Pollution /Sterilisation caused by conflicting land uses |
| PR23 | Special Landscape Area |
| PR24 | Inappropriate development in residential gardens |
| PR25 | Land stability |
| PR26 | Protection and enhancement of Public Rights of Way |
| PR27 | Local green space designations |
| Strategic Objective 6 – To ensure essential infrastructure is in place to support our communities | |
| PR28 | Water and sewage safeguarding areas |
| PR29 | Developments with river frontages and public access, use of culverts |
| PR30 | Flood risk |
| PR31 | Safeguarded land – transport |
| PR32 | New distributor road |
| PR33 | New link road |
| PR34 | Swindon and Cricklade Railway Line |
| PR35 | A350 Shaftesbury Eastern Bypass |
| Community Areas specific | |
| PR36 | Salisbury Townscape |
| PR37 | Restriction to development south of Southampton Road, Salisbury |
| PR38 | Housing for healthcare workers at Salisbury District hospital |
| PR39 | Avebury World Heritage Site including the consideration of car parking and tourist accommodation |
| PR40 | Facilities for boat users on and control of development along the Kennet and Avon Canal |

Table 2: Issues arising from updates to national planning policy since adoption of the Wiltshire Core Strategy

| Ref | Issue |
|------------|-------------------------------------|
| PR41 | Climate Change |
| PR42 | Self Build and Custom Build Housing |
| PR43 | Affordable Housing Threshold |
| PR44 | Optional Housing Standards |
| PR45 | Gypsy and Traveller Sites |
| PR46 | Healthy Living |

Consultation Questions

Consultation Questions: Wiltshire Local Plan Review Position Statement

1. Do you agree with the proposed scope of the Wiltshire Local Plan Review? If no, please explain why and how it should be amended.
2. Do you agree with the policy assessment as set out in Appendix 1 and the proposed recommendations? Please explain your answer.
3. Are there other planning policy issues that the council should consider within the Local Plan Review? If so, what are they and why should they be included?

Please refer to the section 'how to comment' to find out more on how to submit your views.

Timetable and Next Steps

All comments received in relation to this Position Statement will be considered as part of developing the evidence base to inform the review of the Wiltshire Local Plan. Reasonable alternative options will be considered for each policy area which will be subject to sustainability appraisal, incorporating requirements for Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) as appropriate. The SEA and HRA will be a key part of the evidence base and a determining factor in deciding on the revisions to be made to the Wiltshire Local Plan.

A more detailed programme of work is set out in the accompanying Swindon and Wiltshire Joint Spatial Framework Issues Paper, which seeks views on the scale and distribution of growth across Wiltshire and Swindon Borough up to 2036.

A draft policy document showing proposed changes to policies within the Wiltshire Local Plan is programmed for consultation autumn 2018. This will provide a further opportunity to comment before the draft Plan is published for formal consultation.

Appendix 1: Assessment of adopted policies

Issues arising from an assessment of 'saved' policies of the former district councils

The following tables set out the proposed scope of the planning policy issues arising from an initial gap analysis of saved policies and national policy (NPPF and PPG) that are proposed to be addressed by the Wiltshire Local Plan Review. For ease of reference the policies are split by theme, with reference to the Strategic Objectives and the Community Area Strategies of the Wiltshire Core Strategy.

Please use the 'PR' reference numbers in your responses.

The following abbreviations are used;

KLP – Kennet Local Plan 2011, adopted June 2004

NWLP – North Wiltshire Local Plan 2011, Adopted April 2006

SDLP – Salisbury District Local Plan 2011, Adopted June 2003

WWLP – West Wiltshire Local Plan 1st Alteration, Adopted June 2004

WCS - Wiltshire Core Strategy

Strategic Objective 1 – Delivering a Thriving Economy

| PR1 Issue: Telecommunications, especially with respect to the design of larger installations | |
|-------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | WWLP policy U6 (Telecommunications) SDLP policy PS7 (Telecommunications) Policy that sets out the development criteria for telecommunications proposals. |
| Justification | Within the NPPF smaller masts, antennae etc are now permitted development. Paragraph 43 states that Local Planning Authorities should support the expansion of electronic communications networks, but should keep the number of radio and telecommunications masts and sites to a minimum. Existing structures should be used where possible. New sites and equipment should be sympathetically designed. Paragraph 44 sets out that Local Planning Authorities should not impose a blanket ban in certain areas. Policies have been overtaken by legislation. An assessment is needed as to whether the design aspect of the policy, particularly around protected landscapes, is still necessary for larger installations. |
| 2017 WCS Review | |
| Recommendation | Core Strategy Core Policies 3, 48 and 51 are sufficiently detailed to determine planning applications with respect to telecommunications infrastructure whilst protecting Wiltshire's landscape. No amendment is required. DELETE WWLP U6 and SDLP PS7. |

| PR2 | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Issue: Retail and town centre planning policies to include the defining or redefining of primary and secondary shopping frontages, primary shopping areas and town centre boundaries | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | <p>Policies permits certain uses within the Prime / Primary Shopping or frontage Areas and secondary shopping centres subject to certain criteria:</p> <p>KLP policy ED18 (Prime shopping areas) NWLP policy R1 (Town centre primary frontages areas) SDLP policy S1 (Primary shopping frontages in Salisbury and Amesbury) WWLP policy SP4 (Primary retail frontages) NWLP policy R2 (Town centre secondary frontage areas) SDLP policy S2 (Secondary shopping areas in Salisbury and Amesbury) WWLP policy SP5 (Secondary retail frontages) WWLP policy SP1 (Town Centre Shopping) KLP policy ED20 (Retail Development in Devizes Town Centre) SDLP policy S3 (Location of retail development) SDLP policy E3 (Employment Salisbury Central Area) KLP policy ED19 (Devizes and Marlborough Town Centres) KLP policy ED24 (New development in service centres).</p> <p>NPPF Paragraph 23 (Ensuring the vitality of town centres)</p> |
| Justification | <p>NPPF Paragraph 23 requires LPAs to define primary and secondary frontages, the extent of town centre's and primary shopping areas and make it clear which uses will be permitted in such locations. There is also a requirement for setting policies for proposals for main town centre uses which cannot be accommodated in or adjacent to town centres.</p> <p>WCS Paragraph 6.25 identifies that any necessary amendments to the frontages and associated policy will be undertaken through the partial review and supported by evidence as well as setting policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres.</p> <p>New Wiltshire-wide policy and frontage designations will be justified and replaced / considered by the partial review to ensure policy is consistent across Wiltshire and in full compliance with the NPPF.</p> <p>The council has already undertaken independent evidence base work in the study entitled 'Wiltshire Core Strategy Retail Review, February 2015'. This is available on the council's website at http://www.wiltshire.gov.uk/wiltshirecorestrategypartialreview.htm</p> <p>The study includes proposed retail frontages and town centre boundaries as well as possible draft town centre policies. The up-to-date level of retail need has also been calculated to inform any possible retail or town centre use site allocations.</p> |
| 2017 WCS Review | |
| Recommendation | <p>The retail floorspace requirements set out in Core Policy 38 and supporting text were informed by evidence contained in the Retail Study 2011. This is now out of date.</p> <p>A Partial Retail Study was prepared and consulted upon in 2015. This reviewed the retail frontage areas. This evidence remains relevant. However new evidence for floor space requirements is required.</p> <p>Delete Core Policy 38 Paragraphs 6.24 to 6.26. Replace with new policies</p> |

| | |
|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>and supporting text which take into account new evidence and which plan positively for all town centres in Wiltshire.</p> <p>Delete saved policies ED18; ED19; ED20; ED24; R1; R2; R7; S1; S2; S3; SP1;SP4; SP5</p> |
|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

PR3

Issue: Retail and town centre uses; site allocations if need is identified

2015 Partial Review

| | |
|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Existing plan policy to be reviewed and / or NPPF reference | <p>SDLP policy S5 Shopping (Brown Street Car Park, Salisbury)</p> <p>SDLP policy E5 Employment (Brown Street Car Park, Salisbury)</p> <p>WWLP policy SP2 (land at Court Street / Castle Street, Trowbridge)</p> <p>NPPF Paragraph 23 (Ensuring the vitality of town centres)</p> |
| Justification | <p>WCS Paragraph 6.25 identifies that the partial review will allocate a range of suitable sites to meet the scale and type of town centre uses needed.</p> <p>The council has already undertaken some independent evidence base work in the study entitled 'Wiltshire Core Strategy Retail Review, February 2015'. This is available on the council's website</p> <p>http://www.wiltshire.gov.uk/wiltshirecorestrategypartialreview.htm</p> <p>The study includes proposed retail frontages and town centre boundaries as well as possible draft town centre policies. The up-to-date level of retail need has also been calculated to inform any possible retail or town centre use site allocations and site assessments have been undertaken.</p> |

2017 WCS Review

| | |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>The retail floorspace requirements set out in Core Policy 38 and supporting text were informed by evidence contained in the Wiltshire Town Centre and Retail Study 2011. This is now out of date.</p> <p>A Partial Retail Study was prepared and consulted upon in 2015. This reviewed the retail frontage areas. This evidence remains relevant. However new evidence for floorspace requirements is required.</p> <p>Delete Core Policy 38 Paragraphs 6.24 to 6.26. Replace with new policies and supporting text which take into account new evidence and which plan positively for all town centres in Wiltshire.</p> <p>Delete saved policies SDLP Policies S5 and E5, WWLP Policy SP2.</p> |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

PR4

Issue: Farm Diversification, equine facilities and change of use and development and buildings to meet the requirements of agriculture

2015 Partial Review

| | |
|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Existing plan policy to be reviewed and / or NPPF reference | <p>SDLP policy C21 (farm diversification)</p> <p>WWLP policy E10 (horse-related development)</p> <p>NPPF Paragraph 28- diversification of agricultural and other land-based rural businesses</p> |
| Justification | <p>A diversification of agricultural and other land-based rural businesses policy is required by NPPF Paragraph 28. Farm diversification is not currently covered by Core Policy 48 of the Wiltshire Core Strategy and the council should consider its incorporation within Core Policy 48. This should also consider horse-related development.</p> |

| 2017 WCS Review | |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Recommendation | <p>The Core Strategy adequately supports rural employment and farm diversification, through core policies 34, 39 and 48. Existing policies are sufficiently detailed, and flexible enough, to allow the determination of planning applications.</p> <p>No amendments to policies are considered necessary but it is recommended that some amendments are made to the supporting text to aid clarity.</p> <p>DELETE Saved policies SDLP C21 and WWLP E10.</p> |

| PR5 Issue: Employment allocations | |
|--------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | <p>KLP ED3 (Nursted Road, Devizes) ED5 (Marlborough Road, Pewsey) ED21 (the North Gate, The Wharf and Devizes Hospital)</p> <p>NWLP BD1 Employment land: East of Beversbrook Farm and Porte Marsh Industrial Estate, Calne BD1 Employment land: Garden Centre, Malmesbury BD1 Employment land: Land north of Tetbury Hill, Malmesbury BD1 Employment land: Brickworks, Purton BD1 Employment land: Templars Way, Wootton Bassett</p> <p>SDLP E1 Employment (Land at Old Sarum) E8 B Land at Boscombe and Porton Down E12 Land at Mere</p> <p>WWLP E1A New Employment Land Allocation: West Ashton Road, Trowbridge E1B New Employment Land Allocation: South and West of Bowerhill Industrial Estate, Melksham E1D New Employment Land Allocation: Northacre / Brook Lane Trading Estate, Westbury</p> |
| Justification | A number of employment allocation policies are saved by the Wiltshire Core Strategy, however some criteria written within the saved local plans to control development of specific sites may need to be incorporated into the Wiltshire Local Plan to ensure high quality sustainable development. |
| 2017 WCS Review | |
| Recommendation | <p>NPPF Paragraphs 14 and 16 specifically requires that each local plan involves an objective assessment of need in order to help gauge future levels of growth. Updated evidence is now available including Wiltshire and Swindon Local Economic Assessment 2016; Swindon and Wiltshire Functional Economic Market Area Assessment 2017.</p> <p>A new Employment Land Review has been commissioned which will provide updated employment requirements, will assess existing employment allocations as to whether they should remain allocated and consider allocating new sites.</p> |

Strategic Objective 2 – addressing climate change

All previously saved policies have already been replaced by the WCS or deleted.

Strategic Objective 3 – to provide everyone with access to a decent, affordable home**PR6****Issue: Replacement of existing dwellings in rural areas****2015 Partial Review**

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| Existing plan policy to be reviewed and / or NPPF reference | KLP policy HC25 (Replacement of existing dwellings) NWLP policy H4 (Residential development in the open countryside) SDLP policy H39 (Replacement dwellings in the countryside) NPPF Paragraph 55 – Sustainable Development in rural areas |
| Justification | NPPF advises against isolated dwellings in the countryside. Replacement dwelling policy remains relevant. Need to consider amending WCS to include replacement dwellings policy. |

2017 WCS Review

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| Recommendation | NPPF does not require the Core Strategy to include a policy on Replacement Dwellings in Rural Areas. Core Policies 51 and 57 are sufficiently detailed to allow any replacement dwelling proposal to be judged on its own merits. Therefore, no amendment is required DELETE KLP Policy HC25, NWLP Policy H4, SLP Policy H39, and WWDLP Policy H20 |
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PR7**Issue: Temporary Housing for Rural Workers****2015 Partial Review**

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| Existing plan policy to be reviewed and / or NPPF reference | SDLP H28 (Temporary housing for rural workers) NPPF Paragraph 55 – Sustainable Development in rural areas |
| Justification | Investigation needed as to whether there is continued demand for this type of accommodation. Potentially include criteria about temporary dwellings in rural dwellings policy. |

2017 WCS Review

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| Recommendation | Investigate incorporating temporary housing for rural workers policy area into Core Policy 48 (Supporting Rural life) Delete SDLP Policy H28. |
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PR8**Issue: Extensions to dwellings and buildings in the countryside****2015 Partial Review**

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| Existing plan policy to be reviewed and / or NPPF reference | SDLP policy H31 (Extensions to dwellings in the countryside) SDLP policy C24 (Extensions to buildings in the countryside) |
| Justification | Need to consider amending WCS to include rural dwellings and buildings policy area that also identifies the design of extension. |
| 2017 WCS Review | |
| Recommendation | <p>NPPF Paragraph 55 says new isolated dwellings in the countryside should be avoided unless there are special circumstances</p> <p>The NPPF does not explicitly refer to extensions to existing dwellings in the countryside, nor extensions of other types of buildings in the countryside</p> <p>NPPF Paragraphs 56 to 58 relates to the requirement for good design; WCS Core Policy 57 is in accordance with the NPPF. Core Policy 51 also seeks to protect, conserve and where possible enhance landscape character.</p> <p>The requirements of saved SLDP policies H31 and C24 are addressed by the requirements of WCS Core Policies 57 and 51.</p> <p>Core Policy 58 will also ensure extensions to buildings in the countryside are appropriate, where this involved a heritage asset. Some residential extensions will be permitted development for which planning permission is not necessary. No amendment to the Core Strategy is required.</p> <p>DELETE SDLP Policies H31, C24</p> |

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| PR9 | |
| Issue: Accommodation for dependent persons | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | SDLP policy H33 (Accommodation for dependent Persons) |
| Justification | <p>Not addressed in either NPPF or Core Strategy.</p> <p>WCS Core Policy 46 relates to the needs of Wiltshire's vulnerable older people.</p> <p>Need to investigate whether specific policy is necessary or whether it can be covered by general extension policies and/or design considerations.</p> <p>Alternatively, additional wording to Core Policy 46 could be considered.</p> |
| 2017 WCS Review | |
| Recommendation | <p>Core Policy 46 already deals with meeting the needs of Wiltshire's vulnerable and older people. It would therefore be appropriate to add a paragraph to this policy that deals specifically with ancillary accommodation for dependent relatives, with additional explanatory, supporting text added in a new paragraph</p> <p>DELETE SDLP Policy H33</p> |

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| PR10 | |
| Issue: Flat Conversions | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | WWLP policy H16 (Flat Conversions) |
| Justification | Not addressed in either NPPF, PPG or Core Strategy. Planning permission is required for sub-divisions. Further investigation required to understand if subdivision has a negative effect on housing stock in consideration of a Wiltshire-wide policy. |
| 2017 WCS Review | |
| Recommendation | Further investigation required to understand if subdivision has a negative effect on housing stock in consideration of a Wiltshire-wide policy. |

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| PR11 | |
| Issue: Housing allocations | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | SDLP H15 Bulbridge, Wilton |
| Justification | Many of the former district local plan housing allocations have been built out or have planning permission and therefore can be deleted. However one housing allocation still does not have planning permission although is deliverable and some criteria written within the saved local plan to control development may need to be incorporated into the Wiltshire Core Strategy to ensure high quality development. |
| 2017 WCS Review | |
| Recommendation | NPPF says to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. SDLP H15 remains undeveloped. Further investigation required as to whether this site is available and developable and should be retained as an allocation in the Local Plan. |

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| PR12 | |
| Issue: Empty Homes | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | NPPF Paragraph 51 - Identify and bring back into residential use empty housing and buildings |
| Justification | The local plan should consider referencing any actions undertaken by the Council and others to ensure the local plan refers to any practical steps that could be taken to support bringing empty homes back into use. |
| 2017 WCS Review | |
| Recommendation | As the council employs an empty homes officer and has a range of options to pursue if required, a proactive approach to empty homes is in place, and therefore this does not need to be repeated in the Local Plan. |

Strategic Objective 4 – helping to build resilient communities

PR13

Issue: Location of /permissive exceptions policy on education and community facilities Including playgroups, day nurseries, childminding facilities, health, social services, places of worship, community halls, indoor and outdoor sports and recreation facilities and cemeteries.

2015 Partial Review

Existing plan policy to be reviewed and / or NPPF reference

SDLP PS5 (New Education facilities)
 NWLP CF1 (Local community facilities and education facilities)
 SDLP PS6 (Playgroups, child minding facilities and day nurseries)
 SDLP policy R7 (Dual use of educational facilities)
 SDLP policy S1 (Community facilities)

Justification

NPPF Paragraph 72 - The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- give great weight to the need to create, expand or alter schools; and
- work with schools promoters to identify and resolve key planning issues before applications are submitted.

Education listed as essential infrastructure in WCS Core Policy 3 (Infrastructure Requirements)

NPPF Paragraph 37 states that policies should aim for a balance of land uses so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

A generic permissive exceptions policy on the location of education and community facilities needs to be developed, including playgroups, day nurseries, child-minding facilities, health, social services, places of worship, community halls and cemeteries. The policy needs to also consider defining 'indoor and outdoor sports and recreation facilities'

2017 WCS Review

Recommendation

CIL requires all residential development to contribute money for educational purposes. The only exception to this will be sites that are large enough to generate new facilities on their own or in combination.

Core Policy 3 covers the requirement for infrastructure and the Planning Obligations Supplementary Planning Document also sets out the councils approach to contributions.

Policy R7 encourages the dual use of facilities. There is no need for such a policy as using these facilities for ancillary recreation uses would not normally require planning permission.

Policy S1 has been overtaken by events, as the new CIL regime is in place. Policies CF1 and PS5 and 6 are important as they are permissive policies for community and education facilities. New policies to be prepared or existing

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| | <p>policies to be amended.</p> <p>The criteria in PS6 are now covered under Core policy 57, in relation to the compatibility of uses and Core Policy 61 in relation to highway issues</p> <p>DELETE SDLP Policies R7, S1, PS5, PS6 and NWLP CF1</p> |
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| PR14 | |
| Issue: Community facilities allocations | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | <p>WWLP policy CF7 Bowerhill (Community halls) Allocates land for a community hall and education use at Bowerhill</p> <p>WWLP policy CF8 (Community Health) - Allocates land adjacent to and including the Melksham and Trowbridge hospitals for community health care facilities</p> |
| Justification | A small number of community facilities allocation policies are saved by the Wiltshire Core Strategy, however some criteria written within the saved local plans to control development of specific sites may need to be incorporated into the WCS to ensure high quality development and further investigation is still required on a handful of saved community facilities allocations to determine if facility is still required. |
| 2017 WCS Review | |
| Recommendation | <p>New policies to be prepared or existing policies to be amended.</p> <p>DELETE WWLP CF7 and CF8</p> |

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| PR15 | |
| Issue: Health and Wellbeing | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | <p>NPPF Paragraph 171 - Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and wellbeing.</p> |
| Justification | The Wiltshire open space study will provide a robust assessment of needs and deficiencies in open spaces upon which emerging policy in the review will be based. It will also create an up-to-date evidence base which can be maintained to aid implementation of the policies and the provision of open spaces during the plan period until 2026. Although reflected in parts of the Core Strategy (e.g. Strategic Objective 4) and likely to be covered by the open space work this topic area perhaps needs a higher profile in the Core Strategy and any development implications of any relevant health-related strategies incorporated into the WCS. |
| 2017 WCS Review | |
| Recommendation | This needs a higher profile and new policies prepared or existing policies amended. |

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| PR16 | |
| Issue: Public safety from major accidents | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | NPPF Paragraph 172 Planning policies should be based on up-to-date information on the location of major hazards and on the mitigation of the consequences of major accidents. |
| Justification | It should be investigated to determine if there are major hazards in Wiltshire that could create a major accident. |
| 2017 WCS Review | |
| Recommendation | The major hazards are known within Wiltshire and dealt with via the COMAH legislation, and any planning applications that are received close to such hazard, the council would use the HSE's HSE Planning Advice Web App to ascertain whether permission should be granted. Given this knowledge and the procedures that are in place this does not need to be repeated. |

Strategic Objective 5 – protecting and enhancing the natural, historic and built environment

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| PR17 | |
| Issue: Enabling Development | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | SDLP policy G10 (Enabling development) Policy sets out where development proposals may be acceptable when development would not usually be permitted, provided that certain criteria are met to ensure that the overall benefits would outweigh any disadvantages. The policy relates particularly to the continued preservation of heritage assets. NPPF Paragraph 55 promotes enabling development in order to secure heritage assets which is including within Core Policy 48 of WCS. |
| Justification | The NPPF does include the principle of the policy. Potential to introduce principle to Core Strategy and set out Wiltshire basis (possibly as part of Core Policy 58). Currently saved policy G10 probably overly restrictive. |
| 2017 WCS Review | |
| Recommendation | Core Policy 58 already states that statutory consultees such as Historic England will be consulted in the determination of any applications potentially affecting a heritage asset, and that Historic England will be using their <i>Enabling Development</i> policy guidance to inform their recommendation, it is not considered that an amendment to Core Policy 58 is necessary. However, for completeness it is considered that some additional supporting text would be helpful in signposting to the Historic England guidance DELETE SDLP Policy G10 |

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| PR18 | |
| Issue: Disabled Access | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | <p>WWDLP policy I3 (Access for everyone) Policy ensures that the needs of disabled people are considered within development proposals for public buildings.</p> <p>The PPG design chapter recommends thinking about the design of buildings for all users (including the disabled) at the design stage rather than relying on Building Regulation requirements (“disabled people, older people and families with small children, are considered too late in the day”).</p> |
| Justification | Need to incorporate general disabled access criteria into Core Policy 57 (Design). |
| 2017 WCS Review | |
| Recommendation | <p>This is partially covered in Core policy 57, criterion x. The wording of this criteria could be updated to be more specific to the disabled and to improve the clarity of the policy.</p> |
| PR19 | |
| Issue: Design of shopfronts | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | <p>SDLP policy S10 (Shop fronts) Policy requires that proposals for alterations to shop fronts are to have due regard to historic character and scale, and is to be applied only to proposals outside Conservation Areas. The policy is supported by an SPD.</p> <p>Applies to shop fronts not in conservation areas.</p> <p>The PPG sets out that “Town centre buildings should include active frontages and entrances that support town centre activities. Where appropriate they may help to diversify town centre uses and the offers they provide. The quality of signage, including that for shops and other commercial premises, is important and can enhance identity and legibility.”</p> |
| Justification | Corresponding shop front policy in conservation area replaced by WCS Core Policy 58. Potentially need to be included in design policies if it is necessary to introduce Wiltshire-wide standards not just relating to Conservation Areas. |
| 2017 WCS Review | |
| Recommendation | <p>The Core Strategy already contains detailed design and place shaping policies (Core Policies 57 and 58) which can be applied when assessing shopfront proposals. More detailed guidance specifically relating to shopfront design can be found in current design guidance produced by the Council. The supporting text to both Core Policies 57 and 58 requires applicants to have regard to such guidance.</p> <p>DELETE SDLP Policy S10 Amend Core Policy 57 criteria viii to specifically refer to shop fronts,</p> |

| PR20 | |
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| Issue: Trees, woodland, and tree planting schemes | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | <p>NWLP policy NE14 (Trees and the control of new development) Policy restricting developments that would be likely to result in the loss of trees, hedges, lakes/ponds or other important landscape or ecological features. Sets out that Tree Preservations Orders ('TPO') will be applied to tree specimens or groups of notable value.</p> <p>SDLP policy CN17 (Trees) Policy requiring the replacement of TPO trees or trees within Conservation Areas if permission is granted for them to be felled.</p> <p>SDLP policy C9 (Loss of woodland) General woodlands policy relating to the preservation and replacement of woodland. The policy encourages planting of indigenous species.</p> <p>WWLP policy C40 (Tree Planting) Policy relating to the protection and replacement of trees. The policy sets out that trees covered by a TPO will be replaced by at least one tree. Tree planting schemes are proposed in a number of specific locations.</p> <p>Only 'ancient' woodland and veteran trees found outside identified ancient woodland are afforded protection through NPPF Paragraph 118.</p> <p>The PPG sets out extensive details relating to TPOs and trees in Conservation Areas.</p> |
| Justification | <p>WCS Core Policy 50 (Biodiversity and geodiversity) does not deal with individual trees.</p> <p>Core Policy 51 relates to the preservation of landscape character generally including protection for natural features such as trees, hedgerows, woodland, field boundaries, watercourses and water bodies. Policy does not deal with individual trees.</p> <p>Specific development management issue not addressed through NPPF / Core Policies that should consider all aspects of trees, woodland and tree planting.</p> <p>Replacement policy or text should be considered once other consent schemes / legislation for TPO has been considered.</p> |
| 2017 WCS Review | |
| Recommendation | <p>Whilst the Wiltshire Core Strategy does not contain a specific single policy dedicated to the protection and enhancement of trees and woodland, it is considered that this is not necessary as an appropriate amount of protection is afforded through various policies and their supporting text, the NPPF and existing legislation.</p> <p>The Core Strategy policies that include references to trees and/or woodland include: Core Policies 41; 50; 51; 52; 57 and 67.</p> <p>No amendments are considered necessary.</p> <p>Reference to planning conditions is unnecessary as any conditions will be</p> |

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| | attached to individual planning permissions, where relevant. DELETE NWLP Policy NE14; SDLP Policy CN17; SDLP Policy C9; WWLP Policies C40 and NE12. |
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| PR21 | |
| Issue: Open space and recreation policies to include the facilitation and future management of open space and recreational assets and to justify the collection of developer contributions / CIL towards open space provision | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | <p>KLP policy HC34 (Recreation provision on large housing sites) KLP policy HC35 (Recreation provision on small housing sites) NWLP policy CF3 (Provisions of open space) SDLP policy R2 (Open space provision) SDLP policy R3 (Open space provision) SDLP policy H17 (Important open spaces within housing policy boundaries) SDLP policy H18 (Amenity open space within Housing Policy Boundaries) SDLP policy R4 Indoor Community and Leisure Provision KLP policy TR20 (Protection of allotments) SDLP policy R20 (Allotments) WWLP policy R12 (Allotments) Protects allotments WWLP policy R13 (Sailing Lakes) Safeguards recreational use of sailing lakes West Wiltshire Leisure and Recreation DPD – Adopted February 2009</p> <p>NPPF Paragraphs 73 and 74 Planning policies should be based on robust and up-to-date assessments of the need for open space, sports and recreation facilities and assessments for new provision Protecting existing open space, sports and recreational buildings and land, including playing fields</p> |
| Justification | <p>The Wiltshire open space study will provide a robust assessment of needs and deficiencies in open spaces upon which emerging policy in the review will be based. It will also create an up-to-date evidence base which can be maintained to aid implementation of the policies and the provision of open spaces during the plan period until 2026.</p> <p>It is the intention that the Open Space Survey will identify sites that will be protected for open space and recreation.</p> <p>A draft 'Open Space Study' identifies possible draft policies and is available to view at http://www.wiltshire.gov.uk/wiltshirecorestrategypartialreview.htm</p> |
| 2017 WCS Review | |
| Recommendation | <p>It will be necessary to replace the existing saved policies as these are well used by planning and adoptions officers in order to secure protection and provision of open spaces and recreational facilities through the planning process, however they have are not consistent across Wiltshire and more recent evidence has been prepared.</p> <p>DELETE KLP Policies HC34, HC35, NWLP Policy CF3, SDLP Policies R2, R3, H17, H18, R4, TR20, R20, WWLP Policies R12, R13</p> |

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| PR22 | |
| Issue: Hazardous Substances/Noise and Pollution /Sterilisation caused by conflicting land uses | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | NWDP policy NE18 (Noise and pollution) Policy requiring the minimization of noise and pollution impacts of development. Hazardous substances NPPF Paragraphs 121, 164 and 172 Planning policies should be based on up-to-date information on the location of major hazards and on the mitigation of the consequences of major accidents |
| Justification | Covered by NPPF Paragraphs 109, 120, 125) and partly covered by WCS Core Policy 57 vii) and Core Policy 51 vii). Core Policy 55 protects against poor air quality. However, further investigation is needed into sterilisation caused by conflicting land uses and to determine if there are major hazards in Wiltshire that could create a major accident and how core strategy policy could assist |
| 2017 WCS Review | |
| Recommendation | It is considered that topic area is sufficiently covered by the adopted Core Strategy policies and supporting text, and by the NPPF and supporting PPG. DELETE NWDP Policy NE18 |

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| PR23 | |
| Issue: Special Landscape Area | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | SDLP policy C6 (Special Landscape Area) WWLP policy C3 (Special Landscape Area) Policy setting out the considerations required for proposals within the Special Landscape Areas. |
| Justification | Not covered by NPPF. Wiltshire Core Strategy Paragraph 6.80 identifies the need to review Special Landscape Areas. Special Landscape Areas will be reviewed by up-to-date evidence published for the next stage of public consultation into this Partial Review. Possible outcomes could include Core Policy 51 being amended to cover Special Landscape Areas. |
| 2017 WCS Review | |
| Recommendation | New policy needed in relation to the Special Landscape Areas to be protected. DELETE SDLP Policy C6; WWLP Policy C3 |

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| PR24 | |
| Issue: Inappropriate development in residential gardens | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | NPPF Paragraph 53 Consider setting out policies to resist inappropriate development of residential gardens |
| Justification | This is covered through the Adopted Core Strategy however review should be undertaken to consider efficacy of Core Policy 57 with respect to what the Government has referred to as “garden grabbing”. |
| 2017 WCS Review | |
| Recommendation | Inappropriate Development in residential gardens’ will be looked at on a case by |

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| | case basis and the impact of each application will be assessed on its own merits by Development management. Therefore no amendment to the Wiltshire Core Strategy is required. |
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| PR25 | |
| Issue: Land stability | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | NPPF Paragraph 120 Ensure new development is appropriate for its location, to prevent unacceptable risks from pollution and land instability |
| Justification | A criteria-based policy will be developed as part of the early partial review of the Core Strategy. |
| 2017 WCS Review | |
| Recommendation | <p>The Wiltshire Core Strategy currently does not contain a policy which deals with land / slope stability, except in relation to Gypsy and Traveller sites Core Policy 47) criteria i.</p> <p>Core Policy 56 sets out the planning policy for development on or affected by contaminated land, which covers similar considerations as those that would need to be considered in relation to land instability.</p> <p>NPPF Paragraph 120 makes clear that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.</p> <p>There is a need for policy guidance within the Core Strategy which will ensure that developers and landowners are clear about their obligations when considering development proposals that could affect or are affected by land/slope stability in Wiltshire. Core Policy 56 could be expanded to encompass requirements relating to land and slope stability. This would require amendments to the policy text and the supporting text.</p> |

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| PR26 | |
| Issue: Protection and enhancement of Public Rights of Way | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | NPPF Paragraph 75 Planning policies should protect and enhance public rights of way and access |
| Justification | Although protection and enhancement of public rights of way are largely covered by the Wiltshire Core Strategy and the forthcoming Green Infrastructure Strategy, consideration should be given as to whether more detail is required within the WCS itself. |
| 2017 WCS Review | |
| Recommendation | Issues already covered by Core Policy 57 Design and Core Policy 60 Sustainable Transport |

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| PR27 | |
| Issue: Local green space designations | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | NPPF Paragraphs 76 and 77 Allow local communities to identify green areas for special protection, through a Local Green Space designation SDLP policy D5 (Salisbury Townscape (Open Space) Open space policy for Salisbury Central Area where only enhancement and no |

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| | loss of open space will be allowed. The policy was focused around protecting areas where a level of change was expected to take place. |
| Justification | Consideration should be given to amending supporting text to Core Policy 52 to provide town and parish council's with clarification and guidance with respect to Local Greenspace designations. |
| 2017 WCS Review | |
| Recommendation | Consideration should be given to amending supporting text to Core Policy 52 to provide town and parish council's with clarification and guidance with respect to Local Greenspace designations. DELETE SDLP D5 |

Strategic Objective 6 – to ensure essential infrastructure is in place to support our communities

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| PR28 | |
| Issue: Water and sewage safeguarding areas | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | Policies restricting certain types of development within Development Restraint Areas and buffer zones around sewage treatment works: SDLP policy G7 The water environment (Development restraint areas) WWLP policy U4a (Sewage treatment works) WWLP policy U5 (Sewage treatment works buffer zones) |
| Justification | Need to investigate with water companies whether buffer zones are still necessary / appropriate or addressed through a range of other policies for example Environment Agency or the Water Framework Directive. |
| 2017 WCS Review | |
| Recommendation | Add additional text to Core Policy 57 and supporting text. This improves the clarity of the policy, making it clear that development needs to take account of potential effects on amenity from other uses and its effect on existing uses. Remove all existing safeguard/restraint zones from Core Strategy maps and proposals maps. Delete saved policies WWLP Policies U4, U5 and SDLP Policy G7. |

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| PR29 | |
| Issue: Developments with river frontages and public access, use of culverts | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | General policy relating to river front development: SDLP policy R16 (Developments with river frontages and public access) NPPF Paragraphs 76 and 77 allows designation of Local Green Space. |
| Justification | Policy probably needs to be place specific, may be best addressed through a neighbourhood plan/ masterplan on a place by place basis. Investigation needs to be had as to whether buffer strip is necessary as part of other legislation including EU legislation. No policy on use of culverts. Possibly amend Core Policy 68 and/or Core Policy 52 |
| 2017 WCS Review | |
| Recommendation | This issue is mainly covered in Core Policy 68 on Water resources, and |

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| | <p>therefore does not need to be repeated.</p> <p>Culverting is not covered in the Core Strategy at present. However, the culverting of rivers is discouraged by the council and would require authority from either the Environment Agency in the case of main rivers, or the Council in respect of the remaining ordinary watercourses. Therefore as there is other legislation that covers this area, a separate policy on this issue is not required.</p> <p>Developments with River Frontages and Public Access: The Environment Agency require a minimum 8m buffer to access all main rivers (for emergency flooding reasons) and can require land drainage consent for works within this area. The council's bylaws have the same requirements for the remaining ordinary watercourses.</p> <p>Therefore as there is other legislation that covers this area, a separate policy on this issue is not required.</p> <p>DELETE SDLP Policy R16</p> |
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| PR30 | |
| Issue: Flood risk | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | NPPF Paragraph 100 - Direct development away from areas at highest risk but where development is necessary, make it safe without increasing flood risk elsewhere. |
| Justification | Core Policy 67 considers housing development but is not necessarily clear with regard to the location of other forms of development. This could be clarified. |
| 2017 WCS Review | |
| Recommendation | Amendments to Core Policy 67 supporting text and policy are recommended to aid clarity. |

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| PR31 | |
| Issue: Safeguarded land – transport | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | NWDP policy T5 (Safeguarding) Policy to protect existing public rights of way, cycle and pedestrian routes. NPPF Paragraph 75 states that planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails. |
| Justification | The safeguarded routes have been generally replaced by Core Policy 66 (Strategic Transport Network). |
| 2017 WCS Review | |
| Recommendation | Core Policy 52 Green Infrastructure already requires proposals for major development to be accompanied by an audit of existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process. |
| | DELETE NWDP Policy T5 |

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| PR32 |
| Issue: New distributor road |

| 2015 Partial Review | |
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| Existing plan policy to be reviewed and / or NPPF reference | <p>WWLP policy T4(New distributor roads) Policy identifying proposed locations for distributor roads: <i>A. Land west of Bowerhill</i> <i>B. Land south of Westbury and north of Westbury Leigh with connection to Oldfield Road and Leigh Road/Laverton Road</i></p> <p>WWLP policy T5(new link roads) Safeguarding of Paxcroft Mead and Hammond Way for a new link road.</p> <p>NPPF Paragraph 41 Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.</p> <p>NPPF Paragraph 30 sets out that local plans should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.</p> <p>NPPF Paragraph 35 states that plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies.</p> |
| Justification | The safeguarded routes have been generally replaced by Core Policy 66 (Strategic Transport Network). |
| 2017 WCS Review | |
| Recommendation | The safeguarded routes have been replaced by Core Policy 66 (Strategic Transport Network). Some new roads have been built. DELETE WWLP Policies T4 and T5 |

| PR28 | |
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| Issue: New Link Roads | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | <p>WWLP policy T5(new link roads) Safeguarding of Paxcroft Mead and Hammond Way for a new link road.</p> <p>NPPF Paragraph 41 Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.</p> <p>NPPF Paragraph 30 sets out that local plans should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.</p> <p>NPPF Paragraph 35 states that plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies.</p> |
| Justification | The safeguarded routes have been generally replaced by Core Policy 66 (Strategic Transport Network). |
| 2017 WCS Review | |
| Recommendation | The safeguarded routes have been replaced by Core Policy 66 (Strategic Transport Network). Some new roads have been built. DELETE WWLP Policies T4 and T5 |

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| PR34 | |
| Issue: Swindon and Cricklade Railway Line | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | NWLP policy TM3 (Swindon and Cricklade railway line) - Safeguarding the route of the former railway line from Tadpole Lane, Swindon to Cricklade, NPPF Paragraph 41 Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. |
| Justification | Current route as marked on the proposals map has been superseded. Investigation required as to whether new proposals represent robust evidence in order to potentially retain and amend existing route. If justified could incorporate into Core Policy 66 alongside other railway proposals. |
| 2017 WCS Review | |
| Recommendation | Investigate whether safeguarding of the Swindon and Cricklade railway line is still required. |

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| PR35 | |
| Issue: A350 Shaftesbury Eastern Bypass | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | SDLP policy TR20 (A350 Shaftesbury eastern bypass) Safeguarding policy for the corridor of interest of the A350 Shaftesbury Eastern Bypass. NPPF Paragraph 41 Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. |
| Justification | Need to consider whether the bypass is still deliverable and planned. Discussion needs to be had with Dorset County Council / North Dorset District Council. |
| 2017 WCS Review | |
| Recommendation | Consider whether the bypass is still deliverable and planned. Discuss with Dorset County Council/North Dorset District Council |

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| Community Areas |
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| PR36 | |
| Issue: Salisbury Townscape | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | SDLP policy D4 (Salisbury Townscape (Chequers)) SDLP policy E4 (Employment, Salisbury Chequers) Policy to protect the traditional street pattern and design in the Chequers area of Salisbury City. NPPF Paragraph 58 supports policies that set out the quality of development expected. |
| Justification | Investigate whether policy is still required to guide development in Salisbury Central Area / Chequers area or whether many of the available sites have already been developed across the Chequers. If new policy or text required it would be based within Salisbury Area Chapter of WCS. |
| 2017 WCS Review | |
| Recommendation | Core Policy 58 (Ensuring the Conservation of the Historic Environment) and Core Policy 57 (Ensuring high quality design and place shaping) cover similar detail to the saved policies D4 and E4. Therefore no amendment is necessary. DELETE SDLP Policies D4 and E4 |

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| PR37 | |
| Issue: Restriction to development south of Southampton Road, Salisbury | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | SDLP policy E7 (Employment, Southampton Road, Salisbury) Does not allow the extension of employment activity on land to the south of Southampton Road. |
| Justification | Investigate further to determine if evidence, including landscape evidence, identifies whether this policy should be maintained or not. |
| 2017 WCS Review | |
| Recommendation | The policy refers to potential negative impacts of employment expansion on the local environment and setting. Existing policies in the Core Strategy address those issues. These include Core Policies 67 (Flood Risk); 50 (Biodiversity and Geodiversity), 51 (Landscape); 58 (Ensuring the Conservation of the Historic Environment) and 22 (Salisbury Skyline) Core Strategy Paragraph 5.115 sets out that views of the Salisbury roofscape and cathedral spire views will be retained. Therefore no amendment is necessary. DELETE SDLP Policy E7 |

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| PR38 | |
| Issue: Housing for healthcare workers at Salisbury District hospital | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | SDLP policy H2 E (Housing, Salisbury District Hospital) Policy allocates land at the hospital for housing for healthcare workers |
| Justification | Investigation and confirmation of need required with hospital possibility being investigated. |
| 2017 WCS Review | |
| Recommendation | Housing for healthcare workers could come forward on the site through other policies of the Wiltshire Core Strategy including Core Policy 45 Meeting Wiltshire's housing needs and Strategic Objective 4, Paragraph 3.8. DELETE SDLP H2 |

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| PR39 | |
| Issue: Avebury World Heritage Site including the consideration of car parking and tourist accommodation | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | <p>KLP policy TR6 (Tourist facilities in the Avebury World Heritage Site) Policy requires that any new tourist facilities at Avebury WHS must enhance the enjoyment and understanding of the historic sites and monuments.</p> <p>KLP policy TR7 (Facilities for visitors to Avebury) Promotes the improvement of visitor facilities at Avebury provided existing residential and employment premises are not compromised.</p> <p>KLP policy TR8 (Visitor accommodation in the Avebury World Heritage Site) Policy supports change of use for visitor accommodation rather than new build in the Avebury World Heritage Site.</p> <p>KLP policy TR9 (Car Parking in Avebury World Heritage Site) Policy supports limited extension to car parking facilities in the Avebury World Heritage Site.</p> <p>NPPF Paragraphs 137 and 138 - Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.</p> <p>Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under Paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.</p> |
| Justification | <p>These issues are highlighted in the WHS management plan and as such it will be important to try to retain the basis of the existing policies to ensure the World Heritage Site is protected but change can take place.</p> <p>Additional evidence may need to be collated.</p> |
| 2017 WCS Review | |

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| Recommendation | Review Core Policy 59 and consider including additional criteria or supporting text relating to tourist facilities. DELETE KLP Policies TR6, TR7, TR8, TR9 |
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| PR40 Issue: Facilities for boat users on and control of development along the Kennet and Avon Canal | |
| 2015 Partial Review | |
| Existing plan policy to be reviewed and / or NPPF reference | KLP Policy TR2- Facilities for boat users on the Kennet and Avon Canal Policy restricting development on the Kennet and Avon Canal with the exception of the proposals at Caen Hill Flight and Martinslade/Upper Foxhangers |
| Justification | Not covered by NPPF. Core Policy 53 (Wiltshire Canals) looks at restoration and reconstruction of the canals however it does not cover canal facilities for boat users. However KLP Policy TR2 is also referenced in WCS Paragraph 6.98. Investigate possibility of incorporating section into Core Policy 53 (Wiltshire Canals) or possible new policy or supporting text to deal with canal facilities and facilities for boat users Discussion with key bodies will establish what the policy needs to protect and how to achieve the right balance between protection and new development. |
| 2017 WCS Review | |
| Recommendation | Incorporate canal facilities for boat owners into Core Policy 53 (Wiltshire Canals) or new policy DELETE KLP Policy TR2 |

Issues arising from changing national policy since adoption of the Wiltshire Core Strategy

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| PR41 Issue: Climate Change | |
| Existing plan policy to be reviewed and / or NPPF reference | NPPF Paragraph 99 says Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure. |
| 2017 WCS Review | |
| Recommendation | The Core Strategy already contributes to tackling climate change by: <ul style="list-style-type: none"> • delivering the most sustainable patterns of development through focusing growth at the Principal Settlements and Market Towns, as set out by the settlement; • building communities which are resilient to the future impacts of a changing climate as well as other social or economic challenges. • providing an adequate network of green infrastructure which helps to provide shading, and so contributes to cooling in urban areas, and also provides habitats to assist biodiversity adapt to a changing climate; |

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| | <ul style="list-style-type: none"> ensuring more sustainable forms of transport are supported through the development of sustainable transport strategies, thus helping to reduce greenhouse gas emissions reducing the risk of flooding by ensuring that new development is neither vulnerable to flooding nor increases the risk of flooding elsewhere. <p>These issues will be taken into account when preparing new policies and/or allocations.</p> |
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| PR42 | |
| Issue: Self Build and Custom Build Housing | |
| Existing plan policy to be reviewed and / or NPPF reference | PPG Paragraph 005 - Develop policies for self-build and custom house building. Use Council owned land if available and suitable for self-build and custom house building. Engage with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom house building and facilitating access to those on the register where the landowner is interested; and work with custom build developers to maximise opportunities for self-build and custom house building. |
| 2017 WCS Review | |
| Recommendation | Review existing policies and consider amendments and/or new policies to specifically support self build/custom build proposals. |

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| PR43 | |
| Issue: Affordable Housing Threshold | |
| Existing plan policy to be reviewed and / or NPPF reference | <p>PPG Paragraph 31:</p> <p>There are specific circumstances where contributions for affordable housing should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the written ministerial statement of 28 November 2014 and should be taken into account.</p> <p>These circumstances are that:</p> <ul style="list-style-type: none"> contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area) in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty affordable housing and tariff-style contributions should not be sought from any development consisting only of the construction of a residential annex or extension to an existing home. |
| 2017 WCS Review | |
| Recommendation | Review Core Policy 43 which currently requires sites of 5 or more dwellings to provide affordable housing. Amendments to the policy may be required. |

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| PR44 Issue: Optional Housing Standards | |
| Existing plan policy to be reviewed and / or NPPF reference | PPG Paragraph 002 Local Planning Authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local Planning Authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their local plans. Mandatory Building Regulations covering the physical security of new dwellings came into force in 2015 and planning authorities should no longer seek to impose any additional requirements for security of individual dwellings through plan policies, though designing for security of site layout remains a valid planning consideration. |
| 2017 WCS Review | |
| Recommendation | Review existing policies including Core Policy 57(Ensuring High Quality Design and Plan Making). |

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| PR45 Issue: Gypsy and Traveller Sites | |
| Existing plan policy to be reviewed and / or NPPF reference | A Gypsy and Traveller Assessment was completed in December 2014 based on data collected that summer which provides recommendations for new pitch provision in each housing market area, as defined in the Wiltshire Core Strategy, for the period 2014 - 2029. There has been a national change in the definition of "Traveller" since the GTAA was completed. |
| 2017 WCS Review | |
| Recommendation | The change in definition will require a re-assessment of the accommodation needs of Travellers in Wiltshire and Core Policy 47 Meeting the Needs of Gypsies and Travellers to be reviewed and revised. |

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| PR46 Issue: Healthy Living | |
| Existing plan policy to be reviewed and / or NPPF reference | PPG Paragraph 006 says "Local planning authorities can consider bringing forward, where supported by an evidence base, local plan policies and supplementary planning documents, which limit the proliferation of certain use classes in identified areas, where planning permission is required. In doing so, evidence and guidance produced by local public health colleagues and Health and Wellbeing Boards may be relevant. Policies may also request the provision of allotments or allotment gardens, to ensure the provision of adequate spaces for food growing opportunities. Local planning authorities and planning applicants could have particular regard to the following issues: <ul style="list-style-type: none"> • proximity to locations where children and young people congregate such as schools, community centres and playgrounds • evidence indicating high levels of obesity, deprivation and general poor health in specific locations • over-concentration and clustering of certain use classes within a |

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| | <p>specified area</p> <ul style="list-style-type: none">• odours and noise impact• traffic impact• refuse and litter |
| 2017 WCS Review | |
| Recommendation | Consider incorporating new policies or amending existing policies to address this issue. |

Wiltshire Council

Cabinet

10 October 2017

Subject: Military Civilian Integration (MCI) Partnership Update

**Cabinet Member: Councillor Baroness Scott of Bybrook OBE
Leader of the Council**

Key Decision: No

Executive Summary

This report provides Cabinet with an update of the Military Civilian Integration (MCI) Partnership's work and seeks Cabinet's continued support for the partnership and its programme of work. This is a periodic update report, with previous submissions to Cabinet in October 2013 and June 2016. A number of government announcements and significant progress on particular MOD projects now warrant a further update to Cabinet.

This report highlights key aspects of the ongoing work and explains how Wiltshire Council is working together with MOD - the south west regional brigade, the major bases, the Defence Infrastructure Organisation (DIO) and partners in bringing forward the Partnership's workstreams. The aims of the MCI Partnership, which is an important element in the Council's business plan and this report demonstrates how, through the partnership, the goals of the MCI Partnership are being brought forward.

Proposals

That Cabinet:

- i) Confirms its support for the Military Civilian Integration (MCI) Programme, and endorses the approach being taken to delivery of the MCI Workstreams set out by the MCI Board; and**
- ii) In particular notes:**
 - a) The progress and way forward on the Army Basing Programme;**
 - b) The Wiltshire's Armed Forces Community Covenant (which was relaunched in March 2017) and success in drawing down significant covenant grant funding to support local integration projects;**
 - c) The Cooperation with the MOD - DIO in submitting the Round 6 of the One Public Estate bid, to be apprised of the various MCI award applications / bids submitted by Wiltshire Council in the past 12**

months;

- d) The continued cooperation with the MOD in identifying and progressing the opportunities that military presence can bring to boost the economy of Wiltshire.**

Reason for Proposals

The military has a significant presence in Wiltshire, and the nature of this presence will change dramatically over the coming years. It is important that the Council recognises the impacts that military presence will have on Wiltshire, both in terms of the opportunities that this will offer for economic growth, and the preparations that the Council is required to make to ensure that the needs of everyone in Wiltshire are met.

Cabinet is invited to recognise the achievements that have already been made with the support of the MCI Partnership, such as the relaunch of the Wiltshire AF Covenant, the Army Basing programme and ongoing success of The Enterprise Network in supporting military leavers and spouses, while acknowledging that there will be further challenges ahead, whose successful resolution will require the support of the Council working closely with the Ministry of Defence (MOD) and other partners.

Alistair Cunningham, Corporate Director

Wiltshire Council

Cabinet

10 October 2017

Subject: Military Civilian Integration (MCI) Partnership Update

**Cabinet Member: Councillor Baroness Scott of Bybrook OBE
Leader of the Council**

Key Decision: No

Purpose of Report

1. The military has a significant presence in Wiltshire, and the nature of this presence is changing dramatically as the size of the Army continues to grow in the Salisbury Plain Training Area, and potential Defence growth in Lyneham, Warminster and Boscombe Down. Additionally MOD has announced the closure of Army Bases in Colerne, Hullavington and Westbury.
2. It is important that the Council continues to recognise the impacts that military presence will have on Wiltshire, both in terms of the opportunities that this will offer for economic growth, and the preparations that the Council is required to make to ensure that the needs of everyone in Wiltshire are met. There will be further challenges ahead, whose successful resolution will require the support of the Council working closely with the Ministry of Defence (MOD) and other partners.
3. The report updates Cabinet on the important milestones that have been reached through partnership working and the support of the MCI Partnership since the last update report to Cabinet made in 2016. Cabinet is invited to recognise achievements which have included progress made on the relaunch of the Wiltshire AF Covenant, the Army Basing programme and ongoing success of The Enterprise Network in supporting military leavers and spouses, while acknowledging that there will be further challenges ahead.

Relevance to the Council's Business Plan

4. The Business Plan approved by council in July demonstrates a strong commitment to the military community in Wiltshire and contains numerous references to the partnership throughout as detailed in a selection of the following excerpts:

Our vision is to create strong communities Successful return of the British Army from Germany to Wiltshire.

Our priorities areMilitary and civilian communities are well integrated.

Growing the Economy Goals: *The relocation of 4,000 additional Army personnel and their dependents to the Salisbury Plain area by 2019 is important for Wiltshire. We are proud to be a military county and we are actively planning and preparing for the return of these troops from Germany.*

What we will do - Successful return of the British Army from Germany to Wiltshire Continue to implement the Army Basing Programme through the Wiltshire Military- Civilian Integration (MCI) Partnership; ensuring the right infrastructure and sufficient places in locals schools, GP surgeries and other services.

Support military returners and leavers.

Strong Communities Goal: *Military and civilian communities are well integrated.*

Promote the community covenant and deliver additional projects funded with Armed Forces Covenant Grants. Work to embed military representation on the relevant area boards and school governing bodies; and improve public access to MOD sports facilities. Ensure military personnel, their dependents and veterans suffer no disadvantage in access to services compared to the local population.

Main Considerations for the Council

5. To note recent MCI progress and provide continuing Cabinet support for Wiltshire Council's involvement in the partnership.

Background

6. The 2016 report on the MCI Programme updated the Cabinet on its progress since its establishment in 2006, including aspects of:
 - The development of the Army Basing Programme
 - The establishment of the Defence Technical Training College at MOD Lyneham.
 - Expansion of the MCI Board membership to represent the other services and establishments in Lyneham, Boscombe Down and Corsham
 - Other military changes that would have consequences for local communities across Wiltshire.
7. Since then:
 - The Wiltshire's Armed Forces (AF) Community Covenant was re-launched at MOD Lyneham in March 2017. Wiltshire Council was one of the first local authorities to agree a local Covenant in 2011 and our practice in this area has been recognised nationally. The aim of the Community Covenant, including the MOD's covenant grant scheme, is to encourage integration between local civilian and Armed Forces communities, to support the Service community, and nurture understanding and awareness amongst the public of issues affecting the Armed Forces Community. The re-launch was aimed to obtain greater interest and involvement of the Wiltshire business community and 10 companies added their pledges to the covenant.

- Under the AF Covenant Grant Scheme, local (Wiltshire) groups and charities have been awarded a number of new grants. The total value of all grants applied for since the scheme, started in 2011 is c. £1.944m, £912k of which has been awarded in the second tranche (2015 to the present day). Wiltshire Council staff have played a major role in assisting organisations to draft and submit these bids. The council also provide a member (Councillor Seed) to chair the local selection panel.
- In addition to these sums, Wiltshire Council successfully led a bid for £190k, on behalf of Cornwall Council, Devon County Council, Gloucestershire County Council, North Somerset District Council, Plymouth City Council, Somerset County Council and South Somerset District Council to improve implementation of the Covenant by LAs. It will be used to achieve two key aims: To ensure that veterans, reservists and their dependents who need help are identified and that public, private and non-service voluntary & community sector organisations give appropriate support when, where and how it is needed. It is also, seeking to identify underlying causes of issues and identifying preventative measures.
- In 2015 Wiltshire Council was awarded SILVER status under the MOD's Employer Recognition Scheme. In 2017 Wiltshire Council achieved a highly coveted GOLD award, which is granted to organisations that "proactively advocate and support defence, communicating their commitment both internally to employees and externally to the wider community through established policies and examples of support".
- The Army Basing Programme has been developed jointly with the MOD in Wiltshire and the successful consultation on the Defence Infrastructure Organisation (DIO)'s Salisbury Plain Training Area Masterplan which set out the full scope of development. Since then all planning applications by MOD have been approved. The programme needs to deliver, by 2020, in excess of £1Bn spend both in developing facilities within the camps and delivery of military (family) homes "outside the wire". Over 1,000 additional school places are required, the build for which started in June 2017. In excess of £21m, plus land and work directly implemented by MOD to improve roads and ecological mitigation was secured through the s106 agreement - thought to be the largest settlement since the council was formed.
- This partnership approach enabled it to win the SW regional RTPi Award in 2017 and to be a worthy finalist in the national awards.
- The Enterprise Network, managed by the council continues to work with the military community and strives to encourage both service leavers and spouses to consider self-employment through use of the premises throughout Wiltshire and the business support service it offers to fledgling enterprises.
- In addition, the council and the MOD continue to work cooperatively to assist in the present programme of MOD estate disposals in Wiltshire following conclusion of the MOD's review (A Better Defence Estate dated November 2016) to enable new housing and employment opportunities.

- A number of other community integration initiatives have been launched and are ongoing.
 - The council bid for the National AF Day Event in 2018, to be held in Salisbury with support from Swindon Borough and Salisbury City Councils. Although it was not ultimately successful it reached the final short-list for selection and it is planned to bid for the 2019 event which ties in with the return of army units from Germany and would be an appropriate opportunity to mark this occasion by welcoming the army and their families to Wiltshire.
8. Construction of the first phase of Porton Science Park, which will create modern incubation and grow on space for innovative enterprises in the Health and Life Sciences sector. The new Science Incubator building is on programme to be completed in December 2017 and occupation in early 2018. There has been significant commercial interest and based on current enquiries it is anticipated that the accommodation will be over 60% committed by the time the building is handed over to the Council. The project is funded by Wiltshire Council, the Local Growth Fund via the Swindon and Wiltshire Local Enterprise Partnership (SWLEP), and European Regional Development Funding, and is supported by the Porton Campus partners, Defence Science and Technology Laboratory (Dstl) and Public Health England. This and further investment in the Science Park is expected to deliver up to 2,000 high value jobs over the next ten years, providing opportunities in the health and life sciences and defence and security technologies sectors. By close engagement in the development of the above programmes and projects, in addition to undertaking its own core programme of work, the MCI Partnership continues to positively influence a number of initiatives and developments which will benefit both our civilian and military communities.
9. Further high quality jobs are anticipated at Boscombe Down where Wiltshire Council is working closely with the MoD, QinetiQ and other stakeholders to support future opportunities for investment and growth in that location. Many of these opportunities link to the defence aerospace sector and may include a substantial investment by Boeing Defence UK which has shortlisted Boscombe Down as a preferred location for future investment.

Member and Officer Support

10. The MCI Partnership is led by its Partnership Board whose role is to provide strategic direction and guidance. The Partnership Board is chaired by the Leader of Wiltshire Council and the following representatives sit on the Board:
- Commander HQ South West Brigade
 - Portfolio Holder (for Strategic Highways, AONB, ESIF Canals and MCI matters)
 - Corporate Director, Wiltshire Council
 - Defence Infrastructure Organisation
 - Commandant of the Defence School of Electronic and Mechanical Engineering (DSEME)
 - RAF Boscombe Down

- MOD's Director General of Information Systems and Services (Corsham)
 - Homes and Communities Agency
 - Appropriate military charities representation
 - MCI Programme Manager, Wiltshire Council
11. Supporting the Partnership Board is a Delivery Group, to ensure the effective delivery of project is taken forward through a series of workstreams. The Delivery Group is composed of senior officers from partner organisations. Its governance structure which also details full membership and each of these workstreams, which were reviewed in early 2017 is set out at Appendix 1. Progress on many of these workstreams has been touched on in the background section above. The following paragraphs focus on core work streams of the partnership and other initiatives. Salisbury Foundation Trust is about to join the group.

Army Basing

12. Army Basing, is the largest workstream in the partnership. It responds to the Regular Army Basing Plan which will relocate an additional 4,000 troops to Wiltshire by 2020. In addition some 3,200 dependants will accompany them. The significance of this move and increased reliance on reserves, are all expected to have a significant impact on Wiltshire's economy. It is anticipated that there will be in excess of £1 billion investment by MOD by 2020 in the Salisbury Plain area. New requirements in terms of housing, schooling, health and social care, as well as the impact on Wiltshire's communities have been assessed, based upon data provided by the MOD. Independent research suggests that the Army Basing Programme will increase the GVA of the South Wiltshire economy by a 4% rise in jobs (2,300 gross jobs) and a 5% (£143 million) rise in GVA in South Wiltshire.
13. An Army Basing Steering Group was established in 2013, which includes representatives from Wiltshire Council, SWHQ Brigade, the DIO and Wiltshire Council partners (NHS, the Homes & Communities Agency and Emergency Services) to lead this work. It also oversees the work of a series of sub-groups to examine planning, education, communication and health implications. Alongside this, a Councillor Reference Group comprising Wiltshire Councillors in the areas affected by the programme and officers, continues to be regularly briefed and meets, as required, to provide communities with information and a chance to influence implementation of MOD development proposals.
14. The first significant moves to Wiltshire occurred in the summer of 2016, when 5 RIFLES relocated from Paderborn (Germany) to Bulford. This move was successful and required extension of Bulford Kiwi Primary School, which occurred on time to cater for the additional children of the military families. A Learning from Experience Exercise to consider changes any improvements to the council's plans for the remainder of the units relocating to Wiltshire is presently underway.

15. Following the grant of planning permission (some 20 separate applications) work is well underway in the camps, with highly publicised development on new single living accommodation. The first new-build school has commenced on site (June 2017) which will provide 420 school places plus 60 early years capacity. It will enable the transfer of the school from its present site at Figheldean by 2018, as well as expanding its capacity from the present 100 or so places. The remaining school expansion plan under the programme is well advanced with designs reaching conclusion
16. The success of the programme was acknowledged by a LGA Peer Challenge Review conducted in September 2016. The team considered it to be an exemplary programme and organised a national seminar in May 2017 - led by Wiltshire Council - to highlight the programme approach. Over 100 delegates from LAs, the MOD and LGA attended the event.
17. The timely progress of the programme is considerable achievement facilitated through exemplary close working by the Council, its partners and the MOD. To evidence this statement, Wiltshire Council, the DIO and its consultant WYG, won the award for its partnership approach at the SW Regional RTPI awards in May 2017. The project also reached the final of the body's national awards.
18. The MOD's Service Family Accommodation and all school places required to support the remainder of the unit moves are on course for completion by 2019.

MOD Estate Review

19. Under the Government's Strategic Defence and Security Review the MOD is committed to releasing 25% of its built estate by 2020 to facilitate the build of 55,000 new homes in addition to commercial development. This was affirmed by the MOD's Better Defence Estate strategy published in November 2016. The review confirmed the potential to create 55,000 new homes but set a target to release 30% of its built estate. MOD is committing significant funds in improving its retained estate to enable other sites to be released for disposal. The aim is to complete the Defence Estate Optimisation Programme (DEOps) by the early 2030s.
20. Wiltshire Council contributed to the review by advising where development and disposal of Wiltshire based sites is likely to be supported in planning terms and to maximise sales receipts. Wiltshire Council is bidding in partnership with MOD and DIO for Round 6 of the One Public Estate programme for funds to comprehensively masterplan the sites at Colerne, Westbury, Hullavington (for release); help unlock smaller, dispersed MOD sites and accelerate the rationalisation of Boscombe Down (to develop optimal expansion plans). Wiltshire Council sees the opportunity to develop and grow the synergies between the Porton and Boscombe campuses with the theme of defence and security technologies common to both. This will build upon local excellence in areas including forensic energetics, cyber security, vaccinology and wider defence linked health and life sciences at Porton and defence aerospace technologies at Boscombe.

Support to Military Veterans

21. Following adverse publicity on the treatment of military veterans, Wiltshire Council resolved to review and make improvements for the handful of known homeless veterans in the county. With assistance from CAB, Wiltshire Council led a short Task and Finish Group which examined the scale of the problem and made a number of recommendations which were endorsed by the MCI Board in June 2017. It includes proposed changes to qualifying criteria to obtain social housing to service leavers in the council's housing policies, ensuring that veterans are provided with fares to reach support centres by public transport and investigating a veteran self-build initiative in conjunction with the Homes and Communities Agency and military charities.

Implementation of the AF Covenant by Local Authorities

22. Wiltshire Council successfully led a bid on behalf of a number of LAs in the SW, to improve implementation of the AF Covenant. The award was for £190k and will be used to achieve two key aims detailed earlier. A project manager (employed by Wiltshire Council) will drive the changes required across the region. The role will establish a good communications plan, web portal and processes and procedures which can be embedded in the LAs so that front-line staff are trained in dealing with the particular needs of the AF community, which includes serving members, reservists, cadet instructors, veterans and their families. One of the first actions will be to identify and reach out to those in need of greater assistance from LAs.

Communications Plan

23. The MCI Partnership and Army Basing Steering Group are fully supported by senior communications officers at Wiltshire Council and the DIO working together to ensure consistency of messaging. Separate plans for the MCI and Army Basing were merged and new web pages launched in 2016. These are far clearer and aimed at the military community in Wiltshire. The pages are regularly reviewed for accuracy and publication of new material.
24. The council remains supportive of the proposal to site the [Salisbury Plain Heritage Centre](#) which will be a new home for the Royal Artillery Museum and other heritage offerings in the area. Current site proposals are still being considered, but it is likely to be in the Durrington area.

Overview and Scrutiny Engagement

25. The Overview and Scrutiny Committee has formed a Task & Finish Group to review how the MCI programme (with an emphasis on the Army Basing Programme) is being managed by the council. It raised a number of issues which have been largely addressed. The T&F Group have produced a number of interim reports, but is yet to finalise its work.

Safeguarding Implications

26. The Army Basing Programme with a net 7,200 increase in population in Wiltshire, will increase the need for robust safeguarding measures. Discussion with the MOD is underway to define expected requirements, including impacts on service provision. Senior officers involved in safeguarding sit on the MCI Partnership Board and Delivery Group and safeguarding will be an integral part of the MCI Partnership's ongoing work. Data from MOD submitted in April indicates that there are very few children subject to Child Protection plans and families subject to Children In Need plans (which is much lower than the typical position in civilian communities although this could be due to different thresholds).

Public Health Implications

27. The increase in troop numbers and their families that will be brought about by the Army Basing programme will have significant implications for the provision of health care services and wider health and wellbeing considerations. Wiltshire Public Health, Wiltshire's Clinical Commissioning Group, the NHS England Area Team, and Army Primary Health Care have therefore set up a group to address health care commissioning needs. Additionally, a Health Impact Assessment was completed by the Council. It contained 96 recommendations, all of which have been fully addressed and the vast majority implemented.
28. Our public health team routinely works closely with the Defence Medical Service (DMS), the Army's chain of command in Wiltshire, and the local Army Welfare Service to improve the health and wellbeing of both serving personnel and service families. This is of particular importance as we prepare for the increases in these populations arising from the draw down from Germany which will impact not only on our broader health improvement services, but also on the council's health visitor and school nurse services. Working closely with the DMS and the NHS, a paper was produced in June 2017 (titled "*Meeting the Public Health Needs of the Armed Forces - A Resource for Local Authorities and Health Professionals*") in an attempt to ensure the military community were not disadvantaged in the provision of health services. The LGA praised Wiltshire's MCI Partnership for its work in drawing up the guide saying the MCI partnership takes "proactive steps to ensure that all of its health improvement initiatives are accessible to the 16,000 service population and their families living in Wiltshire. It recognises that those wearing a uniform and their families are equally entitled to access services provided by the local authority as other residents."

Procurement Implications

29. There are no direct procurement implications. However, under the Army Basing Programme, the council is required to invest in the following facilities:
- New primary schools in Ludgershall and Larkhill (including early years provision), though the latter is being met through relocation and major expansion of the existing St Michael's Primary, currently sited in Figheledean
 - Extension to Bulford Kiwi Primary

- Extensions to secondary schools - Avon Valley College (Durrington) and Wellington Academy (Tidworth)
- Additional waste collection facilities
- Additional bus stop provision with funds secured from the MOD through the s106 agreement to the Service Family Accommodation planning applications.

The education, transport and waste teams have been fully engaged and are aware of these requirements. They are planning to undertake the necessary procurement to meet the programme.

Equalities Impact of the Proposal (detailing conclusions identified from Equality Analysis, sections 4 and 5)

30. The MCI Programme aims to enable the realignment of service provision to meet the changing needs of the military, their families and veterans. All strands of work and projects are contributing to improving quality of life and opportunities for military families, serving personnel and veterans. This is underlined in the Wiltshire Community Covenant that as detailed above was re-launched in March 2017. In addition, measures will be taken to ensure that this does not adversely affect existing Wiltshire communities.

Environmental and Climate Change Considerations

31. The areas involved in and surrounding the majority of the development proposals are particularly sensitive in terms of environmental and ecological matters not least due to the European protected sites which occur on the Plain. It will be essential to carefully manage the associated potential increased recreational pressure; limit physical damage due to housing provision / transport infrastructure development and offset the impact on the Hydrogeology / hydrology.
32. Environmental Impact Assessments are undertaken as part of planning for the infrastructure projects to ensure measures are in place to mitigate any negative impacts associated with the projects. The MOD has highly qualified environmental officers who have worked cooperatively with Wiltshire Council and statutory authorities' counterparts to resolve or mitigate potential harmful effects on the environment arising from new developments.
33. The MOD's build programme will be constructed to its sustainable build equivalent to the Building Research Establishment Environmental Assessment Model (BREEAM) - that is the Defence Related Environmental Assessment Methodology (DREAM). Through this methodology, the impact to the environment and climate change of such a scale of development will be mitigated by sustainable build practices.

Risk Assessment

34. No specific risks have been identified with the proposal to support the MCI Partnership.

35. With regard to the partnership's programme of work, each workstream applies risk management principles to manage risk. These are in line with the Council's risk management strategy. A Risk and Opportunities Register is maintained for the Army Basing Programme and is regularly reviewed by the Steering Group.

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

36. Not applicable, as no commitment decision is required of Cabinet.

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

37. Not applicable, as no commitment decision is required of Cabinet.

Financial Implications

38. The Army Basing Programme is expected to bring in excess of £1 Billion of infrastructure investment into the local economy. There will be costs associated with the additional services required by the Army Basing Programme. In addition to revenue derived from the Army Basing planning applications, which already stands in the order of £550,000 (with a handful of applications still due covering reserved matters) the council will receive additional CILOCT (Contribution in Lieu of Council Tax) payments of c. £1.5m per annum and is likely to benefit from a sizeable New Homes Bonus, assuming the Government does not end the scheme before the SFA is built and registered. The Council is currently incurring marginal costs which are being funded from within existing resources. These cover the employment of the MCI Programme Manager. This too will need to be monitored to ensure it provides good value for money.
39. Other major capital projects are currently being discussed with the DIO. This will include potential additional development at Lyneham and a £250 million project on Salisbury Plain which MOD is currently assessing and has engaged Wiltshire Council on a confidential basis since late 2015. These will further assist the generation of military related jobs in Wiltshire.

Legal Implications

40. There are no specific legal implications in supporting the MCI Partnership and its programme of work. The legal implications of individual projects are considered as part of the project initiation process. Lead officers within the MCI Delivery Group will consult Legal Services on an ongoing basis in relation to individual projects within each workstream, to ensure that they are structured to comply with relevant legislation and government guidance, including state aid and procurement rules.
41. Under the Armed Forces Covenant the Council has a duty to support services for military and defence personnel and their families. By supporting the MCI Partnership the Council will be helping to ensure that military families are not

disadvantaged and in building resilient relationships between military and civilian communities.

Options Considered

42. The Council has a duty to provide appropriate services to people living and working in Wiltshire, including military and Defence personnel, leavers and their families. In the absence of any alternative organisation or mechanism in place to ensure that the changes in the military footprint in Wiltshire over the following years are met with preparedness and initiatives to provide effective services (education, health, infrastructure, and so on), the option of discontinuing the MCI Programme should be dismissed.

Conclusions

43. Since its establishment in 2006, the MCI Partnership and its programme of work has seen the success of a number of initiatives which have significantly benefited not only the military community comprising of military personnel, leavers and their families, but also of the civilian community whose lives are, in many ways, connected with Wiltshire's strong military heritage. This success is due to the strength of the partnership in working together to develop new initiatives and face the new challenges brought about by the Regular Army Basing Plan. By continuing to support the MCI Partnership, Wiltshire Council will benefit from the cross-cutting and cooperative approach that the MCI Partnership embodies, so that the opportunity to unlock the economic potential of the military and provide better services to Wiltshire's communities will be enhanced.

Tim Martiensen (Acting Associate Director, Economic Development and Planning)

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Date of report: 17 August 2017

Appendices

MCI Delivery Group Governance Structure

Background Papers

The following documents have been relied on in the preparation of this report:
none

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| Military Civilian Integration Partnership | | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|--------------------------------|
| Partnership Board | | | | | |
| <i>Role : Strategic Direction and guidance on all military matters in Wiltshire</i> | | | | | |
| Chair: Leader Wiltshire Council Cabinet Member for Economic Development, Skills, Strategic Transport and Strategic Property Corporate Director: Alistair Cunningham Associate Director Economic Development and Planning | | | Military Lead: HQ Southwest Bde MOD Sites: Corsham (DGISS); Lyneham (DSEME); Boscombe Down Homes and Community Agency Defence Infrastructure Organisation Voluntary Sector (Community First) Swindon and Wiltshire Local Enterprise Partnership | | |
| <i>Officer Support : MCI Programme Manager and HQSW SO1</i> | | | | | |
| Workstreams | | | | | |
| Army Basing | MOD Footprint Strategy / One Public Estate | Best Practice / LGA | Governance | Heritage | LEADER |
| SRO: A Cunningham Op Mngr: K Ladner | SRO: A Cunningham Op Mngr: K Ladner | Carolyn Godfrey Op Mngr: K Ladner | Carolyn Godfrey TBA by R Townsend | TBC TBC | TBC TBC |
| Activities: | Activities: | Activities: | Activities: | Activities: | Activities: |
| Monitor build - Schools programme | Land issues generally | LGA Peer Review | Website | Artillery Museum - Larkhill | Grant applications |
| Monitor build - DIO programme | MOD new development | National LGA Conference | Meetings | WW I Commemoration | Approvals |
| Monitor build - Highways | Operational Sites | National Programme / sites | <i>Board meeting</i> | REME 75 Celebrations | Delivery |
| Prep for service personnel return | <i>Lyneham</i> | Local compact | <i>Delivery Group</i> | Army Basing archaeology | Brexit considerations |
| Explore spousal employment opportunities | <i>Boscombe Down</i> | National MOD Decommissioning & Transition Project | Promotions / engagement | | |
| Visits to Germany | <i>Porton Down</i> | Wiltshire College (Apprenticeships) | Briefing / info management | WORKSTREAM TO BE CONFIRMED BY MCI BOARD | NB: NOT FULL WORKSTREAM |
| Service delivery for increased population | Disposal Sites | Business interface | Team management | | |
| Role of : | <i>Colerne Airfield</i> | Garrison Theatre & Tidworth Leisure Centre | Local Enterprise Partnership engagement | | |
| Army Welfare Service | <i>Colerne - Azimghur Bcks</i> | AF Covenant - Relaunch 2017 | Staff induction | | |
| HIVES (Army Information Centre) | <i>Westbury</i> | AF Covenant - Veterans Gateway application | Outcome / end state / Business as Usual | | |
| Army Families Federation | <i>Hullavington Airfield</i> | AF Covenant - Grant advice to community | Equality impact assessments | | |
| Safeguarding | <i>Hullavington - Buckley Bks</i> | AF Covenant - Tedworth House | | | |
| Community facilities | Vehicle Storage and Support Programme (VSSP) | AF Covenant - Delivery of local services | | | |
| Liaison with neighbouring Local Authorities | Other issues | AF Covenant - Reserves engagement | | | |
| | <i>Warminster</i> | AF Covenant - Wiltshire Council ERS Gold application | | | |
| | <i>Keevil</i> | AF Covenant - Transition Fairs | | | |
| | <i>Ludgershall - potential</i> | AF Covenant - Relaunch 2025 | | | |
| MCI DEIVERY GROUP | | | | | |
| <i>Role: Oversee the work from each workstream and report to the Board</i> | | | | | |
| <i>Corp Director</i> | <i>Director EDP</i> | <i>Director Finance</i> | <i>Public Health Cnslt</i> | <i>Hd of Skills</i> | <i>Hd of School Places</i> |
| Carolyn Godfrey | Alistair Cunningham | Michael Hudson | John Goodall | Ariane Crampton | David Clarke |
| <i>Hd Corp Support</i> | <i>MCI Programme Mngr</i> | <i>Hd of Comns</i> | <i>Hd of New Housing</i> | <i>Enterprise Mngr</i> | |
| Liz Creedy | Kevin Ladner | Tim Edmonds | Janet O' Brien | Angela Hays | |
| <i>CCG</i> | <i>Community First</i> | <i>AWS HIVES</i> | <i>MCI SO1</i> | <i>NHS</i> | |
| Chris Williams (CCG) | Alan Truscott | Emma Thomson | Stephen Hitchcock | Ashley Windebank-Brooks | |

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