

SUMMONS

Meeting: Council

Place: Council Chamber, County Hall, Bythesea Road, Trowbridge, BA14 8JN

Date: Tuesday 25 February 2020

Time: 10.30 am

Councillors are reminded to sign the attendance book before entering the Council Chamber

Please direct any enquiries on this Agenda to Kieran Elliott, of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line 01225 718504 or email kieran.elliott@wiltshire.gov.uk

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

This Agenda and all the documents referred to within it are available on the Council's website at www.wiltshire.gov.uk

Recording and Broadcasting Information

Wiltshire Council may record this meeting for live and/or subsequent broadcast on the Council's website at <http://www.wiltshire.public-i.tv>. At the start of the meeting, the Chairman will confirm if all or part of the meeting is being recorded. The images and sound recordings may also be used for training purposes within the Council.

By entering the meeting room you are consenting to being recorded and to the use of those images and recordings for broadcasting and/or training purposes.

The meeting may also be recorded by the press or members of the public.

Any person or organisation choosing to film, record or broadcast any meeting of the Council, its Cabinet or committees is responsible for any claims or other liability resulting from them so doing and by choosing to film, record or broadcast proceedings they accept that they are required to indemnify the Council, its members and officers in relation to any such claims or liabilities.

Details of the Council's Guidance on the Recording and Webcasting of Meetings is available on request. Our privacy policy can be found [here](#).

Parking

To find car parks by area follow [this link](#). The three Wiltshire Council Hubs where most meetings will be held are as follows:

County Hall, Trowbridge
Bourne Hill, Salisbury
Monkton Park, Chippenham

County Hall and Monkton Park have some limited visitor parking. Please note for meetings at County Hall you will need to log your car's registration details upon your arrival in reception using the tablet provided. If you may be attending a meeting for more than 2 hours, please provide your registration details to the Democratic Services Officer, who will arrange for your stay to be extended.

Public Participation

Please see the agenda list on following pages for details of deadlines for submission of questions and statements for this meeting.

For extended details on meeting procedure, submission and scope of questions and other matters, please consult [Part 4 of the council's constitution](#).

The full constitution can be found at [this link](#). For assistance on these and other matters please contact the officer named above for details

PART I

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

1 **Apologies**

2 **Minutes of Previous Meeting** (*Pages 7 - 78*)

To approve as a correct record and sign the minutes of the last meeting of Council held on 26 February 2019.

3 **Declarations of Interest**

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

4 **Announcements by the Chairman**

5 **Petitions**

5a) **Petitions Received**

No petitions have been received for this meeting.

5b) **Petitions Update** (*Pages 79 - 82*)

A report is attached on petitions received since the last meeting of council.

6 **Public Participation**

The Council welcomes contributions from members of the public.

Statements

If you would like to make a statement at this meeting on any item on this agenda, please register to do so at least 10 minutes prior to the meeting. Up to 3 speakers are permitted to speak for up to 3 minutes each on any agenda item. Please contact the officer named above for any further clarification.

Questions

To receive any questions from members of the public received in accordance with the constitution. Those wishing to ask questions are required to give notice of any such questions in writing to the officer named above (acting on behalf of the Chief Executive Officer) no later than 5pm on 18 February 2020 in order to receive a written response, and no later than 5pm on Thursday 20 February 2020 in order to receive a verbal response. Please contact the officer named on the first page of this agenda for further advice. Questions may be asked without notice if the Chairman decides that the matter is urgent.

Details of any questions received will be circulated to Councillors prior to the meeting and made available at the meeting and on the Council's website.

BUDGET ITEMS

BUDGET 2020/2021

To consider Wiltshire Council's Financial Plan

The updated Budget Report as proposed can be accessed on the following link of the Council's website: [here](#)

7 **Treasury Management Strategy 2020/2021** (*Pages 83 - 124*)

A report from Chief Executive Officers Alistair Cunningham and Terence Herbert.

8 **Wiltshire Council's Financial Plan Update 2020/21 and Medium Term Financial Strategy 2020/21- 2024/25** (*Pages 125 - 142*)

Details of the Budget Process are attached.

8a) Leader's Budget Speech

8b) Relevant extract of the minutes of Cabinet held on 4 February 2020.

8c) The report of the Special Overview and Scrutiny Management Committee held on 28 January 2020.

8d) Financial Plan 2020/21. Report by the Chief Executive Officers can be accessed at this link: [Budget Papers](#)

9 **Capital Strategy and Programme** (*Pages 143 - 176*)

A report from Chief Executive Officers Alistair Cunningham and Terence Herbert.

10 **Council Tax Setting 2020/21** (*Pages 177 - 198*)

A report from Chief Executive Officers Alistair Cunningham and Terence Herbert.

11 **Pay Policy Statement** (*Pages 199 - 218*)

To consider the Pay Policy Statement as recommended by the Staffing Policy Committee at its meeting on 8 January 2020.

A report from Chief Executive Officers Alistair Cunningham and Terence Herbert, and relevant extract of the minutes of the Staffing Policy Committee are attached.

POLICY FRAMEWORK ITEMS

12 **Wiltshire Housing Site Allocations Plan** (*Pages 219 - 530*)

A report from the Chief Executive Officer- Place, Alistair Cunningham.

- 13 **Trowbridge Bat Mitigation Strategy Supplementary Planning Document**
(Pages 531 - 684)

A report from the Chief Executive Officer- Place, Alistair Cunningham.

ITEMS FOR COUNCIL

- 14 **Senior Leadership Structure & Designation of Statutory Officer Posts**
(Pages 685 - 696)

A report from the Head of Paid Service / Director of HR&OD.

COUNCILLORS' MOTIONS

- 15 **Notices of Motion**

To consider the following notices of motions:

- 15a) **Notice of Motion - EU Citizens are welcome here** (Pages 697 - 698)

To consider the attached motion from Cllrs Brian Mathew and Ian Thorn.

- 15b) **Notice of Motion - Herbicides** (Pages 699 - 700)

To consider the attached motion from Cllrs Ian Thorn and Ruth Hopkinson.

OTHER ITEMS OF BUSINESS

- 16 **Announcements from Cabinet and Committees**

a) The Leader, Cabinet members and Chairmen of Committees will be invited to make any important announcements.

b) Councillors will be given the opportunity to raise questions to the Chairmen of Committees on the minutes of their meetings, available [here](#), or to the Dorset and Wiltshire Fire Authority on the minutes of their meetings, available [here](#).

c) Councillors will be given an opportunity to raise general issues relating to Area Boards but not specific local issues.

- 17 **Appointment to the Local Pension Board** (Pages 701 - 704)

A report from Chief Executive Officers Alistair Cunningham and Terence Herbert.

- 18 **Membership of Committees and Review of Allocation to Political Groups**

To determine any requests from Group Leaders for changes to committee membership in accordance with the allocation of seats to political groups approved by the Council.

18a) **Review of Committee Places** (Pages 705 - 714)

To consider the implication on political balance following changes to the number of seats held by political groups on the Council.

18b) **Membership of Committees**

19 **Councillors' Questions**

Councillors were required to give notice of any such question in writing to the officer names on the first page of this agenda **no later than 5pm** nine clear working days before the meeting – **Tuesday 11 February 2020** in order to be guaranteed a written response.

Any question received after 5pm on Tuesday 11 February and no later than 5pm four clear working days before the meeting, **Tuesday 18 February 2020**, may only receive a verbal response at the meeting. Any questions received after this date will be received at the next meeting.

Questions may be asked without notice if the Chairman determines the matter is urgent.

Details of any questions received will be circulated to Councillors prior to the meeting and made available at the meeting and on the Council's website.

PART II

Items during consideration of which it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed.

None

Terence Herbert
Chief Executive Officer (People)
Wiltshire Council
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Alistair Cunningham
Chief Executive Officer (Place)
Wiltshire Council
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Council

MINUTES OF THE COUNCIL MEETING HELD ON 26 NOVEMBER 2019 AT COUNCIL CHAMBER - COUNTY HALL, BYTHESEA ROAD, TROWBRIDGE, BA14 8JN.

Present:

Cllr James Sheppard (Chairman), Cllr Richard Gamble (Vice-Chairman), Cllr Phil Alford, Cllr Ben Anderson, Cllr Pat Aves, Cllr Chuck Berry, Cllr Ian Blair-Pilling, Cllr Richard Britton, Cllr Allison Bucknell, Cllr Andrew Bryant, Cllr Trevor Carbin, Cllr Mary Champion, Cllr Pauline Church, Cllr Ernie Clark, Cllr Richard Clewer, Cllr Mark Connolly, Cllr Christine Crisp, Cllr Anna Cuthbert, Cllr Brian Dalton, Cllr Jane Davies, Cllr Andrew Davis, Cllr Matthew Dean, Cllr Tony Deane, Cllr Christopher Devine, Cllr Bill Douglas, Cllr Mary Douglas, Cllr Peter Evans, Cllr Sue Evans, Cllr Nick Fogg MBE, Cllr Peter Fuller, Cllr Sarah Gibson, Cllr Gavin Grant, Cllr Howard Greenman, Cllr Mollie Groom, Cllr David Halik, Cllr Russell Hawker, Cllr Ross Henning, Cllr Alan Hill, Cllr Sven Hocking, Cllr Ruth Hopkinson, Cllr Atiqul Hoque, Cllr Jon Hubbard, Cllr Chris Hurst, Cllr Peter Hutton, Cllr Hayley Illman, Cllr Simon Jacobs, Cllr Tony Jackson, Cllr Johnny Kidney, Cllr Carole King, Cllr Gordon King, Cllr Edward Kirk, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Jim Lynch, Cllr Brian Mathew, Cllr Laura Mayes, Cllr Ian McLennan, Cllr Nick Murry, Cllr Paul Oatway QPM, Cllr Steve Oldrieve, Cllr Christopher Newbury, Cllr Stewart Palmen, Cllr Andy Phillips, Cllr Horace Prickett, Cllr Leo Randall, Cllr Fleur de Rhé-Philippe MBE, Cllr Pip Ridout, Cllr Tom Rounds, Cllr Baroness Scott of Bybrook OBE, Cllr Jonathon Seed, Cllr John Smale, Cllr Toby Sturgis, Cllr Melody Thompson, Cllr John Thomson, Cllr Ian Thorn, Cllr Tony Trotman, Cllr John Walsh, Cllr Bridget Wayman, Cllr Fred Westmoreland, Cllr Philip Whalley, Cllr Stuart Wheeler, Cllr Philip Whitehead, Cllr Suzanne Wickham, Cllr Christopher Williams, Cllr Graham Wright, Cllr Robert Yuill and Cllr Nick Holder

54 Apologies

Apologies for absence were received from Cllrs Derek Brown, Clare Cape, Stewart Dobson, Jose Green, Darren Henry, Mike Hewitt, George Jeans, Bob Jones and Ricky Rogers.

55 Minutes of Previous Meeting

The minutes of the Meeting held on 9 July 2019 were presented.

Resolved:

That the minutes of the last Council meeting held on 9 July 2019 be approved as a correct record and signed by the Chairman.

56 **Declarations of Interest**

Cllrs. Richard Britton, Richard Clewer and Steve Oldrieve declared non-pecuniary interests in Agenda Item No. 10 - Wiltshire Council Carbon Reduction – Corporate Property Energy Efficiency and Generation Programme Phase 1 as they were Directors of Selwood Housing.

57 **Announcements by the Chairman**

The Chairman made the following announcements:-

(1) Events attended by the Chairman from 9 July to 25 November 2019

Thursday, 18 July, 2019	Wiltshire Scout Council AGM and Celebration of Wiltshire Scouting, Potterne.
Tuesday, 3 September, 2019	Hosted the 'Fly the Red Ensign for Merchant Navy Day' flag raising ceremony, County Hall.
Sunday, 15 September, 2019	CPRE Best Kept Village Competition Presentation Day. Visited Charlton, near Malmesbury, Urchfont, Bratton and Ansty.
Thursday, 19 September, 2019	Trowbridge in Bloom Awards Evening, Civic Centre, Trowbridge.
Friday, 27 September, 2029	Royal visit of HRH The Duke of Gloucester to Melksham Town Hall for the 800 th anniversary celebrations of the granting of a Royal Charter by King Henry III in 1219.
Tuesday, 1 October, 2019	Attended the EmployAbility Job Fair in the Atrium.
Saturday, 5 October, 2019	The Showmen's Guild of Great Britain Western Section Reception, Town Hall, Marlborough following the opening of the Fair.
Friday, 11 October, 2019	Chippenham Town Council Purple Flag Breakfast at The Neeld Community & Arts Centre.
Monday, 14 October, 2019	WRFCA Lord-Lieutenant of Wiltshire Cadet Awards Presentation, Cumberwell Park, Bradford on Avon.
Tuesday, 15 October, 2019	Royal Visit by HRH The Countess of Wessex to the MENCAP South Wiltshire's 60 th anniversary tea party at the Guildhall, Salisbury.

Tuesday, 22 October, 2019	Dedication of new Police Standard, St. Andrew's Church, Chippenham.
Thursday, 24 October, 2019	The REME HQ Officers' Mess Corps Autumn Guest Night, MoD Lyneham.
Friday, 25 October, 2019	RBL Wiltshire County Poppy Appeal Launch 2019, Bowood House, Calne.
Friday, 1 November, 2019	RBL Field of Remembrance Opening Service, Lydiard Park, Swindon.
Saturday, 9 November, 2019	Imber Remembrance Service.
Sunday, 10 November, 2019	Salisbury Remembrance Day Service.
Monday, 11 November, 2019	Chippenham Town Council Armistice Day Commemoration.

(2) Events attended by the Vice-Chairman from 9 July to 25 November 2019

Saturday, 5 October, 2019	Warminster Town Council launch party of new skate park, Warminster Lake Pleasure Grounds.
Friday, 11 October, 2019	Chippenham Town Council Purple Flag Breakfast, Neeld Community and Arts Centre.
Sunday, 13 October, 2019	Royal Wootton Bassett Mayor's Civic Service, St. Bartholomew's and All Saints Church.
Tuesday, 15 October, 2019	Royal Visit by HRH The Countess of Wessex to Entrain Space, Wilton (formerly known as Our Wilton).
Sunday, 10 November, 2019	Trowbridge Remembrance Day Service.

- (3) Cllr Jerry Wickham** – Members will be aware of the sad passing of Councillor Jerry Wickham on 23 July 2019. A thanksgiving service was held at St. John's Church, Long Street, Devizes on Friday, 9th August, 2019 and a Book of Condolence was placed in Trowbridge library for two weeks.

Cllr Wickham represented the Ethandune Division after winning a by-election in 2014, after a distinguished career with Wiltshire Police, and as Cabinet Member for Adult Social Care had a huge impact upon this council and the people of Wiltshire as was noted in the many tributes

given in this Chamber at his last Council meeting. Jerry had been followed in representing Ethandune by his wife, Councillor Suzanne Wickham, whom the Chairman welcome to the Council.

- (4) **Resigning Members** – The Chairman noted the resignation from the Council of Councillor Roy While, Melksham Without South Division, which he had represented since the formation of Wiltshire Council in 2009, due to ill health. He extended the thanks of the Council to Roy for his dedicated service to the people of Wiltshire, both as an elected member and before that as a local government officer.

He also noted the resignation from the Council of Councillor Deborah Halik, who was elected in 2017 to the Trowbridge Lambrok division. The Chairman recorded his thanks to Deborah for her work during her time on the Council, and noted the by-election for Trowbridge Lambrok was due to be held on 28 November 2019.

- (5) **New Members** – In addition to Councillor Suzanne Wickham, the Chairman also welcomed Councillor Nick Holder as the new Councillor for Melksham Without South, and Councillor Carole King as the new Councillor for Westbury North, following the resignation of Councillor David Jenkins announced at the last meeting. He invited new councillors to stand to introduce themselves.

- (6) **South West Challenge** – On 3 October, a team made up of five Wiltshire Council employees took part in the South West Challenge 2019. The team was made up of Vicky Bodman, Jenine Brister, Sean Chacksfield, Doug Coombs, Claire Lovelock and Lynn Trigwell. During the challenge, the team played the part of a senior management team of a failing fictitious council for the day and had to work together and form partnerships with other delegates to turns its fortunes around.

Wiltshire Council won the overall challenge, ahead of 18 other teams – the first time the council has won the challenge.

The Chairman formally recognised that achievement by presenting an Award to the successful team.

- (7) **Local Council Award Scheme** – The Chairman congratulated Royal Wootton Bassett Town Council for being given a Quality Gold certification through the Local Council Award Scheme. This was a government benchmarking scheme administered by the National Association of Local Councils to recognise and celebrate excellent governance, leadership and best practice in local government. Only 47 Councils had achieved Quality Gold status through this scheme.

The Chairman requested that If Members were aware of any other town and parish councils who had received similar recognition he would

welcome that their achievements be reported after the meeting so that they could be included next time.

(8) Membership of Cabinet Cllr Philip Whitehead, Leader, reported that he had appointed Cllr Simon Jacobs to the post of Cabinet Member for Finance & Procurement.

(9) Motion No. 16 – Trophy Hunting The Chairman reported that this Motion had been withdrawn by the mover and seconder prior to the meeting.

58 **Petitions Received**

Resolved:

To note that no petitions had been received for presentation to this meeting.

59 **Petitions Update**

It was reported that since the last meeting five petitions had been received by the Council. Actions taken in response to those petitions as set out in the appendix to the report were noted.

Resolved:

That Council notes the petitions received and the action taken.

60 **Public Participation**

A number of questions and statements by members of the public were received as follows:

- Jacqui Johnston had submitted a question about the provision of sustainable transport to which a response had been provided as set out in the Summons. Ms Hill was not present at the meeting and was therefore unable to ask a supplementary question. A written response would be sent to Ms Johnston.
- Jane Laurie had submitted a question about climate emergency and made a statement to which a verbal response was provided. Cllr Clewer explained that the Council had acknowledged the climate emergency in February 2019 and had resolved to seek to make the county of Wiltshire carbon neutral by 2030. Since that time the Council had been planning to review its key strategy and policy documents and the plans that flowed from them, including those in respect of biodiversity and green space. This was in parallel with continuing the work which was already being carried out across a range of services. While carbon sequestration, biodiversity and green spaces were not a solution in isolation of all the

measures the Council and other organisations and residents of Wiltshire need to put in place, they play a part.

Ms Laurie did not ask a supplementary question. A written response would be sent to Ms Laurie.

- Lou Barry had submitted a question about a commitment to a massive road building programme and climate emergency to which a written response would be sent. Cllr Clewer explained that the Council did not have a massive road building programme. Instead the focus was on targeted infrastructure improvements at key locations relating to the strategic highway network, where necessary, to improve connectivity and support economic and housing growth to meet local needs.

Ms Barry was not present at the meeting and was therefore unable to ask a supplementary question.

- Lou Barry had submitted a question about the proposed SSSI designation for Trowbridge Woods and the provision of a 100m development buffer zone around Biss Barn Ancient Woodland site near Trowbridge to which a written response would be sent. Cllr Toby Sturgis explained that the requirement to conserve Ancient Woodland, as a protected habitat, was clear within legislation and the National Planning Policy Framework. Alongside this, Natural England and the Forestry Commission had issued joint standing advice on conservation of Ancient Woodlands. This framework and advice were applied in relevant decision making across the Council.

Ms Barry was not present at the meeting and was therefore unable to ask a supplementary question.

- Christopher Humphries had submitted question about the protection of Wiltshire's ancient trees and woodlands from harmful development and activities to which a verbal response was provided. Cllr Sturgis reported that the requirement to conserve Ancient Woodland, as a protected habitat, was clear within legislation and the National Planning Policy Framework. Alongside this, Natural England and the Forestry Commission had issued joint standing advice on conservation of Ancient Woodlands. This framework and advice were applied in relevant decision making across the Council. The Council benefitted from a team of Ecologists who advise the Council in its decision making.

Mr Humphries did not ask a supplementary question. A written response would be sent to Mr Humphries.

- Rowena Quantrill made a statement about the Council's policy regarding climate change and the effect on trees and land usage.

- Adrian Temple Brown made a statement made a statement about climate change and considered that actions so far being taken had made little difference to the situation.
- Peter Cousins made a statement about the work undertaken by the Cabinet Member responsible for transport and did not consider that these duties fitted well with other Council work.

61 **Corporate Parenting Panel Annual Report**

The Chairman explained that he had agreed to bring this item forward in the agenda as a foster carer and a personal assistant to a care leaver were due to speak to this item. He thereupon invited Cllr Pauline Church, Cabinet Member for Children, Education & Skills to introduce the report.

She explained that this report formed the annual update to Council from the Corporate Parenting Panel (CPP) in accordance with the Council's Constitution and explained the role of this Panel.

She introduced Bev Kauppinen who explained how she came to be a foster carer and what a typical day in the life of a foster carer was like. Mr Tony Waldron then read out a statement on behalf of a care leaver.

Cllr Church explained that the role of the CPP was to secure Councillor involvement and commitment throughout the Council to deliver better outcomes for children and young people who were Looked After. Councillors were reminded that they had responsibilities as a "corporate parent" for children and young people who were Looked After in Wiltshire.

The CPP had discussed a broad range of topics during the past year whilst considering the young people's views.

Group Leaders then commented on the proposals as follows:

Cllr Philip Whitehead thanked Cllr Church and the CPP for the work they had been undertaking which was much appreciate.

Cllr Ian Thorn welcomed the report and supported the recommendations.

Cllr Ernie Clarke echoed these sentiments.

Cllr Ian McLennan welcomed the report.

The Chairman then invited comments in debate.

Cllr Hubbard welcomed the report and was pleased to note that the CPP had incorporated the views of the Children's Select Committee. He paid tribute to the work of the CPP.

The motion was put to the vote.

Resolved:

To receive and note the Annual Report and ratify improvements required to strengthen Corporate Parenting in Wiltshire

62 **Council Tax Reduction Scheme Review**

The Chairman invited Cllr Simon Jacobs, Cabinet Member for Finance & Procurement to introduce the report. He stated that proposals to the change in Wiltshire Council's Council Tax Reduction Scheme were circulated in July 2019 and this report resulted from concerns which had been raised about the sensitivity of the current scheme, the frequent changes to entitlement and recalculation of a household's council bill following the report of a minor or relatively low change in income.

Cllr Jacobs proposed, duly seconded by Cllr Laura Mayes that the recommendations in the report be adopted.

Group Leaders then commented on the proposals all of whom expressed their support. Cllr Ian McLennan, on behalf of the Labour Group, referred to the letter from Citizens Advice Wiltshire dated 23 October 2019 and in particular the assertion that the proposed Scheme did not treat people on Universal Credit equally as they were not automatically in Band 1. He stated that Universal Credit had been receiving bad publicity. Cllr Jacobs replied by stating that discussions were taking place with HRC to overcome the problems being experienced. Cllr Ian Thorn, as Chairman of the Financial Planning Task Group, informed the meeting that this problem was being addressed and there would be a review in six months. Cllr Gavin Grant agreed that Universal Credit had created significant problems. Cllr Jacobs stated that over 25,000 people were in receipt of Universal Credit and that during the next six months discussions would be taking place with Citizens' Advice Bureau and other interested parties with a view to exploring the possibility of alleviating the problem.

At the conclusion of the debate, it was

Resolved:

To note that following consultation and testing, the proposed changes to the Council Tax Reduction scheme originally presented to Council in July 2019 have been reviewed and reduced to one proposal.

To agree this change to the Council Tax Reduction scheme as set out at section 30 in the conclusion of this report; the change will take effect from April 2020.

Votes for the motion (84)

Votes against the motion (0)

Votes in abstention (0)

63 Treasury Management Strategy

The Chairman invited Cllr Simon Jacobs, Cabinet Member for Finance & Procurement, to introduce the report.

Cllr Jacobs reminded Members that the Council had adopted a Treasury Management Strategy and an Annual Investment Strategy for 2019/2020 at its meeting on 26 February 2019.

In addition to an Annual Report, the Treasury Management Strategy required a midyear report reviewing the Treasury Management activities for the current year so far. This report was considered by Cabinet on 19 November 2019 and recommended Council to approve revised counter party limits.

Cllr Jacobs proposed, duly seconded by Cllr Laura Mayes that the recommendations in the report be adopted.

Group Leaders then commented on the proposals all of whom expressed their support. Cllr Ian Thorn, as Chairman of the Financial Planning Task Group, informed the meeting that he had no comments to make on the proposals.

Resolved:

- (1) To note the contents of the Cabinet Report on Treasury Management Strategy 2019/2020 Half Year ended 30 September 2019**
- (2) To approve revised counter party limits of:**
 - £10.000 million with HSBC in respect of fixed term investments
 - £10.000 million with HSBC in respect of balances held on an overnight basis

Votes for the motion (83)

Votes against the motion (0)

Votes in abstention (1)

64 Wiltshire Council Carbon Reduction - Corporate Property Energy Efficiency and Generation Programme Phase 1

The Chairman invited Cllr Richard Clewer Deputy Leader and Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change & Military-Civilian Integration, to introduce the report.

Cllr Clewer explained that Council was asked to support a new energy efficiency and generation investment programme for the operational property estate recommended by Cabinet as part of the Council's response to the 'Climate Emergency' and its declaration at the meeting of Council on 26 February 2019.

He informed Members that this was aimed at reducing the carbon footprint from the Council's properties by installing a raft of tried and tested solutions selected according to the building type and function. Although it was expected that the cost of this programme would be about £4.8m, it was anticipated that this would bring about annual net savings amounting to £120,000.

It was noted that an outline business case had been produced exploring the viability of canopy-based solar panels at Salisbury Park & Ride sites. This would entail the generation of solar electricity on the sites and selling electricity on a commercial basis to nearby third parties such as Salisbury General Hospital. Park & Ride projects were particularly attractive for the benefit of working with strategic partners and were likely to be eligible for both grant funding and 0% interest loan funding which would significantly reduce the lifetime project cost to the Council.

Cllr Clewer proposed, duly seconded by Cllr Philip Whitehead, that the recommendations in the report be adopted.

Sarah Prinsloo had submitted a question about the limiting of energy use and made a statement to which a verbal response was provided. Cllr Clewer stated that the carbon reduction programme targeted properties in the Council's operational portfolio from which the Council directly delivered its services or where council contractors delivered council services and still retained control over the energy bills. As described in the paper this excluded those sites which were occupied by the council's contractors, but the Council did not pay the energy bill or have responsibility for maintenance of the property. Many of these sites, which included care homes, children's centres, nurseries and farms, were the subject of existing leases or contracts. There were approximately 200 of these across the county. The contracts and leases which were in place did not allow the Council to control or implement directly low carbon projects. As these contracts and leases expired or were terminated the Council might review its position on these.

Ms Prinsloo did not ask a supplementary question. A written response would be sent to Ms Prinsloo.

Group Leaders then commented on the proposals all of whom expressed their support. However, Cllr Ian McLennan, representing the Labour Group, suggested that consideration might be given in the future to the setting up of an arm's length company to look into the production of commercial electricity. Cllr Graham Wright, as Chairman of the Global Warming & Climate Emergency Task Group, informed the meeting that the Task Group fully supported the proposals.

During the subsequent discussion, Members generally supported the proposals but it was suggested that in due course some consideration might be given to the production of on shore wind power and also the production of solar electricity at other Council carparks.

Cllr Clewer thanked Members for their suggestions and stated that consideration would be given to the production of solar electricity from other

Council carparks. He considered that the setting up of a company to sell commercial electricity might prove more difficult and research was being undertaken to explore various options. Regarding the production of on shore wind power and the use of wind turbines, more research would need to be undertaken to ascertain its safety to health.

Resolved:

1) To agree the addition of £5.2m capital funding to the Councils 2020 to 2023 Capital Programme to deliver the Operational Property Energy Efficiency and Generation Programme as a step towards achieving carbon neutrality for its operational property portfolio.

2) To note that a full business case for canopy-based solar panels at all viable Park and Ride sites will be presented to Cabinet for subsequent approval and to approve a provisional capital allocation of £3.5m from Council's 2020 to 2023 Capital Programme.

Votes for the motion (66)

Votes against the motion (0)

Votes in abstention (1)

65 **Housing Revenue Account Business Plan and Council House Build Programme**

The Chairman invited Cllr Richard Clewer, Deputy Leader and Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change & Military-Civilian Integration, to introduce the report.

Cllr Clewer explained that in October 2018 Cabinet had approved a proposal to proceed with Council House Build Programme Phase 2, committing £9.48m into the development of 49 units over 16 sites.

Subsequently, the cap on borrowing funded by the Housing revenue account (HRA) had been lifted. A review of the HRA business plan had identified the capacity to fund a new Council house development programme. Council was now being asked to consider the HRA business plan model and a phase 3 development programme.

It was noted that at its meeting on 8 October 2019, Cabinet considered the detailed proposed programme for phases 3.1 and 3.2 of the next phase of council house development and had agreed the council house, build programme phases 3.1 & 3.2 at a total cost of £18.717m and £18.754m.

Cllr Clewer proposed, duly seconded by Cllr Philip Whitehead, that the recommendations in the report be adopted.

Group Leaders then commented on the proposals all of whom expressed their support. Cllr Whitehead stated that council houses would continue to be built in

the future. He highlighted the fact that social rent council houses would be built to a very high standard.

During the subsequent discussion, Members expressed their full support for the proposals

Resolved:

- 1) **To agree the Housing revenue account business plan 2020/21-2050 to deliver 1000 new homes over the next 10 years.**
- 2) **To agree to Council house, build programme phases 3.1 and 3.2 at total cost of £18.717m and £ 18.754m respectively**

Votes for the motion (74)

Votes against the motion (0)

Votes in abstention (1)

66 **Melksham Community Campus and Melksham House Construction Projects and Development Opportunities**

The Chairman invited Cllr Allison Bucknell, Cabinet Member for Communications, Communities, Leisure and Libraries, to introduce the report.

Cllr Bucknell explained that design development that provided a scheme which offered the appropriate facilities based an assessment of local need and a subsequent detailed cost analysis had determined that Melksham Community Campus could not be delivered within the approved budget envelope. In order to complete the Melksham Community Campus project a further £3.00m of capital funding was required.

Cllr Bucknell proposed, duly seconded by Cllr Simon Jacobs, that the recommendations in the report be adopted.

Group Leaders then commented on the proposals all of whom expressed their support.

During the subsequent discussion, Members expressed their support for the proposal.

Resolved:

That Full Council support an additional capital budget for the Community Campus Project of £3.000 million taking the total capital budget to £20.110 million

Votes for the motion (73)

Votes against the motion (0)

Votes in abstention (1)

67 **The Maltings**

The Chairman invited Cllr Philip Whitehead, Leader of the Council, to introduce the report.

Cllr Whitehead stated that the regeneration of the Maltings and Central Car Park site was a long-standing policy objective of the Council which was shared by the Swindon and Wiltshire Local Enterprise Partnership (SWLEP).

It was a prime city centre site but needed redevelopment to boost Salisbury's economy and responded to the economic shocks that had impacted on the city in recent years. This had been recognised by SWLEP and Government which had allocated £6.1m Local Growth Funding towards the site's regeneration. The Council's Strategic Planning Committee had endorsed the Maltings Masterplan and had granted permission for a first phase hotel, library and gym, whose delivery would unlock a second phase of development on Market Walk.

A report setting out a delivery plan for the initial phases of the Maltings was considered by Cabinet on 8 October 2019 and its proposals were approved.

Cllr Whitehead proposed, duly seconded by Cllr Atiqul Hoque, that the recommendations in the report be adopted.

Cllr Ian Thorn and Cllr Ian McLennan then commented on the proposals both of whom expressed their support.

During the subsequent discussion, Members expressed their support for the proposal. Cllr Matthew Dean considered this to be an important project for Salisbury and was pleased at the current position.

Resolved:

That Full council approve the allocation of capital finance towards the acquisition of third-party land holdings and fund further development as detailed in the October report.

Votes for the motion (75)

Votes against the motion (1)

Votes in abstention (0)

68 **Homelessness Strategy**

The Chairman invited Cllr Richard Clewer, Deputy Leader and Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change & Military-Civilian Integration, to introduce the report.

Cllr Clewer stated that the Homelessness Act 2002 placed a statutory obligation on local authorities to undertake a review of homelessness in their area and develop and publish a homeless strategy to help prevent homelessness, based

on findings of the review. This strategy had been informed by Wiltshire Council's Homelessness Review 2018 and Homeless Health Needs Assessment.

Cllr Clewer pointed out that this would be the Council's first Homeless Strategy since the introduction of the Homeless Reduction Act 2017 and would take into account new duties placed on the Council which represented the biggest changes in the homeless legislation in 20 years.

The report had been considered by Cabinet on 8 October 2019

Cllr Clewer proposed, duly seconded by Cllr Philip Whitehead, that the recommendations in the report be adopted.

Group Leaders then commented on the proposals all of whom expressed their support. Cllr Whitehead stated that this was one of the best strategies he had seen and it was encouraging to note that this was at variance with the national trend where the number of rough sleepers was regrettably increasing.

Cllr Graham Wright, as Chairman of the Homelessness Strategy Task Group, drew attention to the thorough work undertaken by this Task Group and welcomed the proposal.

During the subsequent discussion, Members expressed their support for the proposal and it was noted that Dr Andrew Murrison MP supported the need for the funding required.

Resolved:

That Full Council approve the homeless strategy 2019 – 2024 and agrees the implementation of the Homeless Strategy Action Plan.

Votes for the motion (76)

Votes against the motion (0)

Votes in abstention (0)

69 **Household Waste Management Strategy**

The Chairman invited Cllr Bridget Wayman, Cabinet Member for Highways, Transport & Waste, to introduce the report.

Cllr Wayman explained that a county-wide consultation was carried out in 2017, which helped in the development of a new Household Waste Management Strategy. Following on from this, and with the input from the Environment Select Committee, a draft Household Waste Management Strategy and annual performance reports and annual action plans were formulated which were circulated with this report.

The report had been considered by Cabinet on 8 October 2019 and the recommendation had been approved.

Cllr Wayman proposed, duly seconded by Cllr Toby Sturgis, that the recommendation in the report be adopted.

Group Leaders then commented on the proposals all of whom expressed their general support. Cllr Whitehead acknowledged that the strategy was complex and it was necessary for its contents to be regularly examined and updated as necessary. There was a need to reduce the amount of plastic waste and also food waste. Cllr Ian Thorn considered that the Strategy contained some weaknesses and suggested that it should contain clearer targets.

Cllr John Smale, as Chairman of the Environment Select Committee, reported that earlier in the year the Waste Contracts Task Group had been spent time considering problems associated with fly tipping and had recommended that the MyWiltshire App be amended so that the reporting of fly tipping/waste incidents became a simpler and more user-friendly process. This recommendation was approved and supported by the Environment Select Committee.

During the subsequent discussion, Members expressed their support for the proposal and expressed the hope that further work would be undertaken to further strengthen the Strategy.

Resolved:

That Council approves the Household Waste Management strategy as part of the Council's Policy Framework.

Votes for the motion (68)

Votes against the motion (1)

Votes in abstention (4)

70 **Wiltshire Council Equality and Inclusion Annual Report 2019 and Objectives 2019-2022**

The Chairman invited Cllr Richard Clewer, Deputy Leader and Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change & Military-Civilian Integration, to introduce the report.

Cllr Clewer explained that as a public body, Wiltshire Council was required to demonstrate its compliance with the Public Sector Equality Duty (PSED) (Equality Act 2010). Accordingly, the Council had published an annual equality and inclusion report which provided evidence and case studies to demonstrate how the Council meets its PSED each year.

In addition, the Council had also to prepare and publish one or more objectives that it considered it needed to be achieved to further any of the aims of the general equality duty. This was first undertaken in 2012 and at least every four years thereafter. The previous objectives were published in 2015 and since then five new objectives for 2019-2022 had been developed, details of which were set out in the report.

The report was considered by Cabinet on 17 September 2019 and the recommendations were approved.

Cllr Clewer proposed, duly seconded by Cllr Allison Bucknell, that the recommendation in the report be adopted.

Group Leaders then commented on the proposals all of whom expressed their general support. Cllr Ian Thorn, whilst welcoming the document, considered that more specific actions were required.

Cllr Graham Wright, as Chairman of the Overview & Scrutiny Management Committee, fully supported the report and objectives.

During the subsequent discussion, Members expressed their support for the proposal. Cllr Bucknell drew attention to the availability of training on GROW, which is available [here](#) and stated that it was essential training for all Members.

Resolved:

That Council adopt the Equality & Inclusion Objectives (The Corporate Equality Plan).

Votes for the motion (74)

Votes against the motion (0)

Votes in abstention (0)

71 **Statement of Licensing Policy**

The Chairman invited Cllr Laura Mayes, Cabinet Member for Adult Social Care, Public Health & Public Protection to introduce the report.

Cllr Mayes reported that there was a requirement for the Council to review its Licensing Policy every five years. The Policy was now due for review and it was necessary for it to be consulted upon and approved by Full Council prior to it being published and coming into force.

Cllr Mayes explained that Wiltshire Council as the Licensing Authority, was required to discharge its responsibilities under the Licensing Act 2003 with a view to promoting four licensing objectives, namely:

- The prevention of crime and disorder
- Public Safety
- The prevention of public nuisance, and
- The protection of children from harm.

Cllr Mayes proposed, duly seconded by Cllr Peter Hutton, that the recommendation in the report be adopted.

Group Leaders then commented on the proposals all of whom expressed their general support.

Resolved:

That Council approves the Statement of Licensing Policy (2019 -2024) (Appendix 1) under Licensing Act 2003.

Votes for the motion (73)

Votes against the motion (0)

Votes in abstention (0)

72 **Wiltshire Air Quality Strategy**

The Chairman invited Cllr Laura Mayes, Cabinet Member for Adult Social Care, Public Health & Public Protection to introduce the report.

Cllr Mayes reminded Members that local authorities had a duty to monitor air quality within their areas having regard to national air quality objectives and standards and report this information to the Department for Environment, Food & Rural Affairs (Defra) annually.

As part of the development of the revised Wiltshire Air Quality Strategy views and comments had previously been sought from the Environment Select Committee and the Health & Wellbeing Board. The strategy was considered and approved by Cabinet on 8 October 2019.

Cllr Mayes proposed, duly seconded by Cllr Simon Jacobs, that the recommendation in the report be adopted.

Group Leaders then commented on the proposals all of whom expressed their general support. Cllr Philip Whitehead referred to problems that arose in trying to implement various aspects of the Strategy and reported on proposed changes that had been the subject of considerable local resistance in Devizes in attempting to reduce the amount of vehicle emissions.

Cllr Ian Thorn agreed that changes to traffic flows often were the subject of local resistance but there was a need for clear and smart actions as it was vital that vehicle emissions were reduced. Cllr Ian McLennan agreed and highlighted the problems associated with parental parking outside schools. He suggested that targets should be set to reduce the amount of traffic taking children to and from school.

Cllr John Smale, as Chairman of the Environment Select Committee, endorsed the draft Strategy.

During general discussion, there was support for the Strategy but the challenge of maintaining and improving air quality in at least some of Wiltshire's market towns was considerable. Reference was made to a range of actions as set out in the Strategy which should be developed and implemented as a priority. It

was acknowledged that there were large parts of Wiltshire where there was very little or no air pollution but there were areas in a number of towns where the problem was acute. It was considered that working with commercial partners, bus companies and schools locally was most important in achieving reductions

Resolved:

That Council notes and approves the Air Quality Strategy.

Votes for the motion (69)

Votes against the motion (4)

Votes in abstention (0)

73 **Update on Wiltshire Council's Response to a Climate Emergency**

The Chairman invited Cllr Richard Clewer, Deputy Leader and Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change & Military-Civilian Integration, to introduce the report.

Cllr Clewer reminded Members that at its meeting on 26 February 2019, Full Council resolved to acknowledge that there was a climate emergency and to seek to make the County of Wiltshire carbon neutral by 2030. The report before Members was an update on actions the Council was taking to reduce carbon generation in Wiltshire in the following areas:

- Renewable energy generation, energy use and efficiency
- Planning
- Transport and air quality
- Waste
- Land use
- Business and industry
- The council's greenhouse gas emissions
- Carbon audit and renewables audit
- Working with partners to deliver this goa.

Cllr Clewer proposed, duly seconded by Cllr Philip Whitehead, that the recommendation in the report be adopted.

Bill Jarvis had submitted a question and made a statement regarding the need for adequate financial provision for the necessary work to be undertaken to which a verbal response was provided. Mr Jarvis did not ask a supplementary question. A written response would be sent to Mr Jarvis.

Group Leaders then commented on the proposals all of whom expressed their support. In commending the report, Cllr Philip Whitehead referred to constraints on the Council's Budget and the strong competing demands for financial provision in other areas. He suggested that areas which might be looked at included the possibility of reducing the number of school runs, the provision of proper cycle paths and footways away from roads.

Cllr Ian Thorn supported the report and considered it to be a good start in making Wiltshire carbon neutral. However, there was a need to proceed as quickly as possible and to ensure that the contents of local plans supported the urgency of this emergency. Cllr Ian McLennan similarly considered the work so far undertaken to be a good start.

Cllr Graham Wright, as Chairman of the Global Warming & Climate Emergency Task Group, congratulated officers on the amount of work which had so far been accomplished but considered that further success could be achieved with more engagement with local communities.

During general discussion, Members expressed their appreciation for the actions taken to date but suggested that officers should be briefed to ensure that footways be constructed prior to the completion and occupation of new housing projects.

Resolved:

That Council notes the actions taken in response to the climate emergency including Cabinet's commitment to make Wiltshire Council carbon neutral by 2030.

74 **Proposed Changes to the Constitution**

74a) Protocol 4 of the Constitution: Planning Code of Good Practice

The Chairman invited Cllr Richard Clewer, Deputy Leader and Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change & Military-Civilian Integration, to introduce the report.

Cllr Clewer stated that Full Council was being asked to consider recommendations of the Standards Committee in relation to Protocol 4 of the Constitution (Planning Code of Good Practice).

Standards Committee considered the legal position, and the concerns previously expressed by Full Council, and as such agreed proposed amended wording as follows:

*“12.6 While there is a strong presumption that the Division Member's **views on request for call-in** should prevail, if another Member (i.e. one from a neighbouring division which is **materially** affected by the development) thinks an application should go to committee **and this is contrary to the view of the local Division Member**, it will be open to that member to discuss the application with the **Chairman of the committee they can make that request in the same way as a request within their own division.**”*

A concern raised at Full Council was the possibility of officers rejecting the call-in of a local Member. In practice, officers were not aware of any examples of a local Member's call-in request being rejected. However, it was explained that

the wording of Protocol 4 had no impact upon the requirements of the Scheme of Delegation in respect of call-in.

Cllr Clewer proposed, duly seconded by Cllr Bridget Wayman, that the recommendations in the report be adopted.

Group Leaders were invited to comment on the proposals but had no comments to make.

There was no discussion on the proposals.

Resolved:

That Full Council approve the proposed changes to Protocol 4 of the Constitution.

Votes for the motion (66)

Votes against the motion (0)

Votes in abstention (2)

74b) Part 4A of the Constitution: Petitions Scheme

The Chairman invited Cllr Richard Clewer, Deputy Leader and Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change & Military-Civilian Integration, to introduce the report.

Cllr Clewer stated that Full Council was being asked to consider recommendations of the Standards Committee in relation to Part 4A of the Constitution (Petitions Scheme).

Standards Committee recommended a series of changes intended to enhance the role of members of the public and provide greater clarity around thresholds, expectations on petition organisers and council procedures when a debate had been triggered by a petition. The proposed changes were set out in Appendix D to the report.

Cllr Clewer proposed, duly seconded by Cllr Stuart Wheeler, that the recommendations in the report be adopted.

Group Leaders were invited to comment on the proposals but had no comments to make.

There was no discussion on the proposals.

Resolved:

That Full Council approve the proposed changes to Part 4A of the Constitution.

Votes for the motion (67)
Votes against the motion (0)
Votes in abstention (0)

75 **Polling District and Polling Place Review**

The Chairman invited Cllr Richard Clewer, Deputy Leader and Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change & Military-Civilian Integration, to introduce the report.

Cllr Clewer stated that the report set out recommendations from the Electoral Review Committee for the Polling District and Polling Place Review conducted in 2019 and arrangements for future Polling District and Polling Place Reviews

Cllr Clewer proposed, duly seconded by Cllr Gavin Grant, that the recommendations in the report be adopted.

Group Leaders were invited to comment on the proposals but had no comments to make.

There was no discussion on the proposals.

Resolved:

- (1) That Full Council approve the recommendations from the Electoral Review Committee for adjustments to polling stations, polling places and polling districts as set out in the Appendices to the report.**
- (2) That Full Council approve the proposed changes to the Terms of Reference of the Electoral Review Committee to delegate approval of future Polling District and Polling Place Reviews to the Committee.**

Votes for the motion (65)
Votes against the motion (0)
Votes in abstention (1)

76 **Notices of Motion**

76a) Notice of Motion - Trophy Hunting

The Chairman reminded Members that, as mentioned under Chairman's Announcements, this motion had been withdrawn by the mover and seconder prior to the meeting.

76b) Notice of Motion - Business Plan

The meeting considered the following Motion by Cllr Ian Thorn and Cllr Brian Matthew:

“Business Plan – To make the following changes to Wiltshire Council’s Business Plan (amendments in bold)

Amend the vision of the Business Plan to:

*‘Create strong **and sustainable** communities in Wiltshire’*

Amend the final paragraph of the introduction to the Business Plan to:

*‘We will continue to make Wiltshire a special place where communities are not only strong, but **sustainable**, more connected and able to cope with any challenges they face. **Recognising our commitment to addressing the climate emergency, we will consider how all our activity can support our programme of work on both combating the climate crisis and ameliorating its consequences.**’*

Amend the goals on p3 under ‘Working with partners as an innovative and effective council’ to *‘Community Involvement: robust decision making which is open, inclusive, flexible, responsive **and considers the long-term implications of tackling the climate emergency.**’*

Amend the text on p4 under ‘delivering our priorities’ to:

*‘Our overall vision to deliver strong **and sustainable** communities continues, but there will be some changes to our services, including:*

A programme of work tackling the climate emergency which will consider the ways in which all of our services can contribute to this aim by both reducing the use of carbon in the Council’s estate, and across the county of Wiltshire, and also by responding to the effects of the climate emergency to protect the lives and livelihoods of Wiltshire’s residents’

Delegate any consequential amendments of the Business Plan to Executive Directors, in consultation with the Leader.”

Cllr Thorn stated that work was currently being undertaken to revise the Council’s Business Plan and commended his Motion as a means of ensuring that the climate emergency was fully recognised and given due prominence in the Plan.

Cllr Whitehead, as Leader with responsibility for the production of the Council’s Business Plan, responded by informing Members that it was his intention to give prominence on the climate emergency in the Business Plan and that work would continue with the Global Warming and Climate Emergency Task Group to take this forward. He requested that this Motion be referred to him as Leader without debate.

On the proposal of the Chairman, which was seconded by Cllr Richard Gamble,

Resolved:

To refer the Motion to the Leader of the Council without debate.

Announcements from Cabinet and Committees

There were no Cabinet Members or Chairmen of Committees who wished to make any important announcements.

78 **Appointments to the Local Pension Board**

The Chairman invited Cllr Simon Jacobs as Cabinet Member for Finance & Procurement to introduce the report.

Cllr Jacobs reported that vacancies had arisen on the Local Pension Board to which Council appointed membership as the Administering Authority. The report set out the recruitment process undertaken with recommendations for appointment.

Cllr Jacobs proposed, duly seconded by Cllr Whitehead, that the recommendations in the report be adopted.

Group Leaders were invited to comment on the proposals but had no comments to make.

There was no discussion on the proposals.

Resolved:

- (1) That Council appoints the following members to the Local Pension Board for a four-year term:
Ian Jones (Employer Member Representative)
Robb Lauder (Scheme Member Representative)**
- 2) To note the following members to the Local Pension Board are re-appointed for a further four-year term:
Barry Reed (Scheme Member Representative)
Mike Pankiewicz (Scheme Member Representative)**

79 **Appointment of Chairmen, Vice- Chairman and Membership of Committees**

The Chairman introduced a report which updated the Council on the outcome of the by-elections for Westbury North (18 July), Ethandune (19 September) and Melksham Without South (24 October). There were also certain changes to membership of committees.

On the Motion of the Chairman, which was seconded by Cllr Richard Gamble,

Resolved:

- (1) Note the report and the legal requirements;**
- (2) In accordance with paragraph 4.4 of Part 3 of the Constitution**

(Responsibilities for Functions) to ratify appointment of Cllrs Carole King and Suzanne Wickham to Westbury Area Board, and Cllr Nicholas Holder to Melksham Area Board.

- (3) To appoint a Chairman to the Staffing Policy Committee and Vice Chairman to the Wiltshire Pension Fund Committee.

Staffing Policy Committee

Chairman Cllr Stuart Wheeler

Vice-Chairman Cllr Tony Jackson (no change)

Wiltshire Pension Fund

Chairman Cllr Tony Deane (no change)

Vice-Chairman Cllr Simon Jacobs

- (4) To make those changes to the appointment of councillors and substitutes to serve on those committees in accordance with the revised scheme of committee places, until the next occasion membership is reviewed under the provisions of the Local Government & Housing Act 1989, as follows:

- Cllr Ian Thorn to be removed as a member of the Strategic Planning Committee and replaced by Cllr Carole King.
- Cllr Darren Henry to be removed as a member of the Western Area Planning Committee and replaced by Cllr Suzanne Wickham.
- Cllr Nick Holder to be added as a substitute member of the Western Area Planning Committee in place of the late Cllr Roy While.
- Cllr Suzanne Wickham to be added as a substitute member of the Overview & Scrutiny Management Committee in place of the late Cllr Roy While.
- Former Cllr Deborah Halik to be removed as a member of the Children's Select Committee and replaced by Cllr Nick Holder.
- Cllr Johnny Kidney to be removed as a member of the Children's Select Committee and replaced by Cllr Phil Whalley.
- Cllr David Halik to be removed as a member of the Children's Select Committee and replaced by Cllr Fred Westmoreland.
- Cllr Suzanne Wickham to be added as a member of the Children's Select Committee in place of the late Cllr Roy While.
- Cllr James Sheppard to be added as a substitute member of the Children's Select Committee in place of Cllr Phil Whalley (now a full member of this Select Committee).
- Cllr David Halik to be removed as a substitute member of the Health Select Committee and replaced by Cllr Suzanne Wickham.

- Cllr Anna Cuthbert to be removed as a member of the Audit Committee and replaced by Cllr Pip Ridout.
- Cllr Tony Jackson to be removed as a member of the Audit Committee and replaced by Cllr Nick Holder.
- Cllr Pip Ridout to be removed as a substitute member of the Audit Committee (now a full member of this Committee) and replaced by Cllr Anna Cuthbert.
- No replacement to be made in respect of the late Cllr Roy While as a substitute member of the Audit Committee.
- Cllr Brian Dalton to be removed as a member of the Appeals Committee and replaced by Cllr Carole King.
- Cllr Andrew Davis to be added as a substitute member of the Appeals Committee.
- Cllr Allison Bucknell to be removed as a member of the Staffing Policy Committee and replaced by Cllr Stuart Wheeler.
- Cllr Ian Thorn to be removed as a member of the Staffing Policy Committee and replaced by Cllr Carole King.
- Cllr Toby Sturgis to be removed as a member of the Officer Appointments Committee and replaced by Cllr Simon Jacobs.
- Cllr Simon Jacobs to be added as a member of the Wiltshire Pension Fund Committee in place of the late Cllr Roy While.

80 Councillors' Questions

Questions were received from Cllrs Ian Thorn, Ernie Clark and Chris Hurst as detailed in the Summons at Item No. 26 together with responses.

- Question 19-36 from Cllr Ian Thorn to Cllr Allison Bucknell/Cllr Richard Clewer – Council press releases follow-up.

Cllr Thorn did not ask a supplementary question.

- Question 19-37 from Cllr Ernie Clark to Cllr Allison Bucknell – Council rebranding.

Cllr Clark did not ask a supplementary question.

- Question 19-38 from Cllr Chris Hurst to Cllr Pauline Church – School transport.

As a supplementary question, Cllr Hurst asked why emissions were not being tested and why that was not a criteria in the tendering process. In response Cllr Church said that idling restrictions of vehicles in traffic queues and a 15-year limit on school transport vehicles was good. She would respond to specific issues if Cllr Hurst provided her with specific issues.

- Question 19-39 from Cllr Chris Hurst to Cllr Laura Mayes/Cllr Pauline Church – Drug trafficking in rural communities.

As a supplementary question on county lines, Cllr Hurst asked if schools knew who to contact about a young person they thought to be at risk. Cllr Church responded that, as part of the National Curriculum, schools included lessons on Personal, Social, Health & Economic (PSHE) Education which should help.

- Question 19-40 from Cllr Chris Hurst to Cllr Bridget Wayman – Car parking, Royal Wootton Bassett.

As a supplementary question on parking issues, Cllr Hurst asked how much finance was being spent on public transport. Cllr Bridget Wayman stated that all net income from parking charges went into public transport and she would confirm this in writing.

(Duration of meeting: 10.30am 12.50pm &
1.30pm - 4.05pm)

The Officer who has produced these minutes is Roger Bishton of Democratic Services, direct line 01225 713035, e-mail roger.bishton@wiltshire.gov.uk

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

26/11/2019

11:58:11

Voting 1/1 - Vote - 26/11/2019 11:58:05

Council Tax Reduction

84



Confirmation presences: 86

■ Yes	: 84
■ No	: 0
■ Abstained	: 0

26/11/2019

11:58:17

Voting 1/1 - Vote - 26/11/2019 11:58:05

Confirmation presences: 86

Yes	: 84
Baroness Scott of Bybrook OBE	: 1
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Andy Phillips (Ind)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiquil Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Bill Douglas (LD)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Chris Hurst (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Devine (Ind)	: 1
Cllr Christopher Newbury (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Gordon King (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr Jim Lynch (LD)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Jonathon Seed (C)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Mollie Groom (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Nick Murry (Ind)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Paul Oatway QPM (C)	: 1
Cllr Pauline Church (C)	: 1

26/11/2019

11:58:17

Voting 1/1 - Vote - 26/11/2019 11:58:05

Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Pip Ridout (C)	: 1
Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ross Henning (LD)	: 1
Cllr Russell Hawker (Ind)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Sarah Gibson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stephen Oldrieve (LD)	: 1
Cllr Stewart Palmen (LD)	: 1
Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1

No : 0

Abstained : 0

26/11/2019

12:06:23

Voting 2/2 - Vote - 26/11/2019 12: 06:18

Treasury Management Strategy

84



Confirmation presences: 86

■ Yes	: 84
■ No	: 0
■ Abstained	: 0

26/11/2019

12:06:32

Voting 2/2 - Vote - 26/11/2019 12:06:18

Confirmation presences: 86

<input checked="" type="checkbox"/> Yes	: 84
Baroness Scott of Bybrook OBE	: 1
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Andy Phillips (Ind)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiquil Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Bill Douglas (LD)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Chris Hurst (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Devine (Ind)	: 1
Cllr Christopher Newbury (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Gordon King (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr Jim Lynch (LD)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Jonathon Seed (C)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Mollie Groom (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Nick Murry (Ind)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Paul Oatway QPM (C)	: 1
Cllr Pauline Church (C)	: 1

26/11/2019

12:06:32

Voting 2/2 - Vote - 26/11/2019 12:06:18

Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Pip Ridout (C)	: 1
Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ross Henning (LD)	: 1
Cllr Russell Hawker (Ind)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Sarah Gibson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stephen Oldrieve (LD)	: 1
Cllr Stewart Palmen (LD)	: 1
Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1

No : 0

Abstained : 0

26/11/2019

12:48:19

Voting 3/3 - Vote - 26/11/2019 12:48:12

Carbon Reduction



Confirmation presences: 86

Yes	: 83
No	: 0
Abstained	: 1

26/11/2019

12:48:25

Voting 3/3 - Vote - 26/11/2019 12:48:12

Confirmation presences: 86

Yes	: 83
Baroness Scott of Bybrook OBE	: 1
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiquil Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Bill Douglas (LD)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Chris Hurst (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Devine (Ind)	: 1
Cllr Christopher Newbury (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Gordon King (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr Jim Lynch (LD)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Jonathon Seed (C)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Mollie Groom (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Nick Murry (Ind)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Paul Oatway QPM (C)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1

26/11/2019

12:48:25

Voting 3/3 - Vote - 26/11/2019 12:48:12

Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Pip Ridout (C)	: 1
Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ross Henning (LD)	: 1
Cllr Russell Hawker (Ind)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Sarah Gibson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stephen Oldrieve (LD)	: 1
Cllr Stewart Palmen (LD)	: 1
Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1

No : 0

Abstained : 1

Cllr Andy Phillips (Ind) : 1

26/11/2019
13:48:34

Voting 5/5 - Vote - 26/11/2019 13:48:28

Housing Revenue Account



Confirmation presences: 80

Yes	: 74
No	: 0
Abstained	: 1

26/11/2019

13:48:37

Voting 5/5 - Vote - 26/11/2019 13:48:28

Confirmation presences: 80

Yes	: 74
Baroness Scott of Bybrook OBE	: 1
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiquil Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Chris Hurst (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Gordon King (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr Jim Lynch (LD)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Jonathon Seed (C)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Mollie Groom (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1

26/11/2019

13:48:37

Voting 5/5 - Vote - 26/11/2019 13:48:28

Cllr Pip Ridout (C)	: 1
Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Sarah Gibson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stewart Palmen (LD)	: 1
Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1
<hr/>	
<input type="checkbox"/> No	: 0
<hr/>	
<input type="checkbox"/> Abstained	: 1
Cllr Stephen Oldrieve (LD)	: 1

26/11/2019
13:53:14

Voting 6/6 - Vote - 26/11/2019 13:53:10

Melksham Campus



Confirmation presences: 80

Yes	: 73
No	: 0
Abstained	: 1

26/11/2019

13:53:20

Voting 6/6 - Vote - 26/11/2019 13:53:10

Confirmation presences: 80

Yes	: 73
Baroness Scott of Bybrook OBE	: 1
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiquel Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Chris Hurst (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Gordon King (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr Jim Lynch (LD)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Jonathon Seed (C)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Pip Ridout (C)	: 1
Cllr Richard Britton (C)	: 1

26/11/2019

13:53:20

Voting 6/6 - Vote - 26/11/2019 13:53:10

Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Sarah Gibson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stephen Oldrieve (LD)	: 1
Cllr Stewart Palmen (LD)	: 1
Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1
<hr/>	
No	: 0
<hr/>	
Abstained	: 1
Cllr Edward Kirk (C)	: 1

26/11/2019
13:59:21

Voting 7/7 - Vote - 26/11/2019 13:59:08

The Maltings



Confirmation presences: 80

Yes	: 75
No	: 1
Abstained	: 0

26/11/2019

13:59:24

Voting 7/7 - Vote - 26/11/2019 13:59:08

Confirmation presences: 80

Yes	: 75
Baroness Scott of Bybrook OBE	: 1
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiquil Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Chris Hurst (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Gordon King (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr Jim Lynch (LD)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Jonathon Seed (C)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Mollie Groom (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Pip Ridout (C)	: 1

26/11/2019

13:59:24

Voting 7/7 - Vote - 26/11/2019 13:59:08

Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Sarah Gibson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stephen Oldrieve (LD)	: 1
Cllr Stewart Palmen (LD)	: 1
Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1
No	: 1
Cllr Ernie Clark (Ind)	: 1
Abstained	: 0

26/11/2019

14:13:38

Voting 8/8 - Vote - 26/11/2019 14:13:34

Homelessness Strategy

76



Confirmation presences: 80

■ Yes	: 76
■ No	: 0
■ Abstained	: 0

26/11/2019

14:13:43

Voting 8/8 - Vote - 26/11/2019 14:13:34

Confirmation presences: 80

■ Yes	: 76
Baroness Scott of Bybrook OBE	: 1
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiqul Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Chris Hurst (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Gordon King (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr Jim Lynch (LD)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Jonathon Seed (C)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Mollie Groom (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1

26/11/2019

14:13:43

Voting 8/8 - Vote - 26/11/2019 14:13:34

Cllr Pip Ridout (C)	: 1
Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Sarah Gibson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stephen Oldrieve (LD)	: 1
Cllr Stewart Palmen (LD)	: 1
Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1

No	: 0
----	-----

Abstained	: 0
-----------	-----

26/11/2019

14:36:44

Voting 10/10 - Vote - 26/11/2019 14:36:35

Household Waste Management



Confirmation presences: 80

Yes	: 68
No	: 1
Abstained	: 4

26/11/2019

14:36:49

Voting 10/10 - Vote - 26/11/2019 14:36:35

Confirmation presences: 80

Yes	: 68
Baroness Scott of Bybrook OBE	: 1
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiquil Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Gordon King (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr Jim Lynch (LD)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Mollie Groom (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Nick Murry (Ind)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Pip Ridout (C)	: 1
Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ruth Hopkinson (LD)	: 1

26/11/2019

14:36:49

Voting 10/10 - Vote - 26/11/2019 14:36:35

Cllr Sarah Gibson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stewart Palmen (LD)	: 1
Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Trevor Carbin (LD)	: 1

No	: 1
Cllr Chris Hurst (LD)	: 1

Abstained	: 4
Cllr Hayley Illman (LD)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Stephen Oldrieve (LD)	: 1

26/11/2019

14:44:16

Voting 11/11 - Vote - 26/11/2019 14:44:13

Equality Report

74



Confirmation presences: 80

Yes	: 74
No	: 0
Abstained	: 0

26/11/2019

14:44:21

Voting 11/11 - Vote - 26/11/2019 14:44:13

Confirmation presences: 80

Yes	: 74
Baroness Scott of Bybrook OBE	: 1
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiqul Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Chris Hurst (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Gordon King (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jim Lynch (LD)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Mollie Groom (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Nick Murry (Ind)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Pip Ridout (C)	: 1

26/11/2019

14:44:21

Voting 11/11 - Vote - 26/11/2019 14:44:13

Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stephen Oldrieve (LD)	: 1
Cllr Stewart Palmen (LD)	: 1
Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1

No : 0

Abstained : 0

26/11/2019

14:48:41

Voting 12/12 - Vote - 26/11/2019 14:48:38

Licensing Policy

73



Confirmation presences: 80

Yes	: 73
No	: 0
Abstained	: 0

26/11/2019

14:48:47

Voting 12/12 - Vote - 26/11/2019 14:48:38

Confirmation presences: 80

Yes	: 73
Baroness Scott of Bybrook OBE	: 1
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiquil Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Gordon King (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr Jim Lynch (LD)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Mollie Groom (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Pip Ridout (C)	: 1
Cllr Richard Britton (C)	: 1

26/11/2019

14:48:47

Voting 12/12 - Vote - 26/11/2019 14:48:38

Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Sarah Gibson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stewart Palmen (LD)	: 1
Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1

No : 0

Abstained : 0

26/11/2019

15:10:13

Voting 13/13 - Vote - 26/11/2019 15:10:05

Air Quality



Confirmation presences: 80

Yes	: 69
No	: 4
Abstained	: 0

26/11/2019

15:10:21

Voting 13/13 - Vote - 26/11/2019 15:10:05

Confirmation presences: 80

Yes	: 69
Baroness Scott of Bybrook OBE	: 1
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiquil Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Gordon King (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr Jim Lynch (LD)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Pip Ridout (C)	: 1
Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1

26/11/2019

15:10:21

Voting 13/13 - Vote - 26/11/2019 15:10:05

Cllr Ruth Hopkinson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stewart Palmen (LD)	: 1
Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Tony Trotman (C)	: 1
No	: 4
Cllr Chris Hurst (LD)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Nick Murry (Ind)	: 1
Cllr Trevor Carbin (LD)	: 1
Abstained	: 0

26/11/2019
15:41:46
Voting 14/14 - Vote - 26/11/2019 15:41:42

Protocol 4



Confirmation presences: 78

Yes	: 66
No	: 0
Abstained	: 2

26/11/2019

15:41:51

Voting 14/14 - Vote - 26/11/2019 15:41:42

Confirmation presences: 78

Yes	: 66
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiqul Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Chris Hurst (LD)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Nick Murry (Ind)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Pip Ridout (C)	: 1
Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Sarah Gibson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stuart Wheeler (C)	: 1

26/11/2019

15:41:51

Voting 14/14 - Vote - 26/11/2019 15:41:42

Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1

No	: 0
----	-----

Abstained	: 2
Cllr Christine Crisp (C)	: 1
Cllr Leo Randall (C)	: 1

26/11/2019
15:46:07
Voting 15/15 - Vote - 26/11/2019 15:46:04
Part 4A

67



Confirmation presences: 76

■ Yes	: 67
■ No	: 0
■ Abstained	: 0

26/11/2019

15:46:14

Voting 15/15 - Vote - 26/11/2019 15:46:04

Confirmation presences: 76

Yes	: 67
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiquel Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Chris Hurst (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr John Smale (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Mollie Groom (C)	: 1
Cllr Nick Holder (CON)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Pip Ridout (C)	: 1
Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Simon Jacobs (C)	: 1

26/11/2019

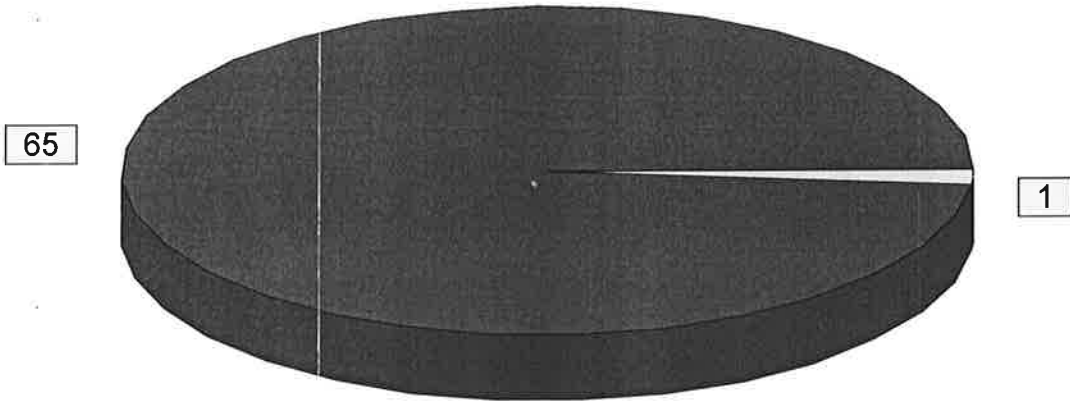
15:46:14

Voting 15/15 - Vote - 26/11/2019 15:46:04

Cllr Stuart Wheeler (C)	: 1
Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Deane (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1
<hr/> No	: 0
<hr/> Abstained	: 0

26/11/2019
15:50:15
Voting 16/16 - Vote - 26/11/2019 15:50:10

Polling District



Confirmation presences: 76

Yes	: 65
No	: 0
Abstained	: 1

26/11/2019

15:50:21

Voting 16/16 - Vote - 26/11/2019 15:50:10

Confirmation presences: 76

Yes	: 65
Cllr Alan Hill (C)	: 1
Cllr Allison Bucknell (C)	: 1
Cllr Andrew Bryant (LD)	: 1
Cllr Andrew Davis (C)	: 1
Cllr Anna Cuthbert (C)	: 1
Cllr Atiqul Hoque (C)	: 1
Cllr Ben Anderson (C)	: 1
Cllr Brian Dalton (LD)	: 1
Cllr Brian Mathew (LD)	: 1
Cllr Bridget Wayman (C)	: 1
Cllr Carole King (LD)	: 1
Cllr Chris Hurst (LD)	: 1
Cllr Christine Crisp (C)	: 1
Cllr Christopher Williams (C)	: 1
Cllr Chuck Berry (C)	: 1
Cllr David Halik (C)	: 1
Cllr Edward Kirk (C)	: 1
Cllr Ernie Clark (Ind)	: 1
Cllr Fleur de Rhe-Philippe (C)	: 1
Cllr Fred Westmoreland (C)	: 1
Cllr Gavin Grant (LD)	: 1
Cllr Graham Wright (Ind)	: 1
Cllr Hayley Illman (LD)	: 1
Cllr Horace Prickett (C)	: 1
Cllr Howard Greenman (C)	: 1
Cllr Ian Blair-Pilling (C)	: 1
Cllr Ian McLennan (Lab)	: 1
Cllr Ian Thorn (LD)	: 1
Cllr Jacqui Lay (C)	: 1
Cllr Jane Davies (C)	: 1
Cllr Jerry Kunkler (C)	: 1
Cllr John Smale (C)	: 1
Cllr John Thomson (C)	: 1
Cllr John Walsh (Lab)	: 1
Cllr Johnny Kidney (C)	: 1
Cllr Jon Hubbard (LD)	: 1
Cllr Laura Mayes (C)	: 1
Cllr Leo Randall (C)	: 1
Cllr Mark Connolly (C)	: 1
Cllr Mary Champion (C)	: 1
Cllr Mary Douglas (C)	: 1
Cllr Matthew Dean (Ind)	: 1
Cllr Melody Thompson (C)	: 1
Cllr Pat Aves (LD)	: 1
Cllr Pauline Church (C)	: 1
Cllr Peter Evans (C)	: 1
Cllr Peter Fuller (C)	: 1
Cllr Peter Hutton (C)	: 1
Cllr Philip Alford (C)	: 1
Cllr Philip Whalley (C)	: 1
Cllr Philip Whitehead (C)	: 1
Cllr Richard Britton (C)	: 1
Cllr Richard Clewer (C)	: 1
Cllr Robert Yuill (C)	: 1
Cllr Ruth Hopkinson (LD)	: 1
Cllr Simon Jacobs (C)	: 1
Cllr Stuart Wheeler (C)	: 1

26/11/2019

15:50:22

Voting 16/16 - Vote - 26/11/2019 15:50:10

Cllr Sue Evans (C)	: 1
Cllr Suzanne Wickham (CON)	: 1
Cllr Sven Hocking (C)	: 1
Cllr Toby Sturgis (C)	: 1
Cllr Tom Rounds (C)	: 1
Cllr Tony Jackson (C)	: 1
Cllr Tony Trotman (C)	: 1
Cllr Trevor Carbin (LD)	: 1

No	: 0
----	-----

Abstained	: 1
-----------	-----

Cllr Nick Holder (CON)	: 1
------------------------	-----

Full Council Meeting Tuesday 26 November 2019 – Members' Attendance

Name	Time in (Meeting)	Time Out (Meeting)
Phil Alford	10:30	16:05
Ben Anderson	10:30	16:05
Pat Aves	10:30	16:05
Chuck Berry	10:30	16:05
Ian Blair Pilling	10:30	16:15
Richard Britton	10:30	16:05
Derek Brown		
Andrew Bryant	10:30	16:05
Allison Bucknell	10:30	16:05
Clare Cape		
Trevor Carbin	10:30	16:05
Mary Champion	10:30	16:05
Pauline Church	10:30	16:05
Richard Clewer	10:30	16:05
Mark Connolly	10:30	16:05
Christine Crisp	10:30	16:05
Anna Cuthbert	10:30	16:05
Brian Dalton	10:30	16:05
Jane Davies	10:30	16:05
Andrew Davis	10:30	16:05
Tony Deane	10:30	16:05
Matthew Dean	10:30	16:05
Christopher Devine	10:30	16:05
Stewart Dobson		
Mary Douglas	10:30	16:05
Bill Douglas	10:30	13:30
Peter Evans	10:30	16:05
Sue Evans	10:30	16:05
Nick Fogg	10:30	12:15
Peter Fuller	10:30	16:05
Richard Gamble	10:30	16:05
Sarah Gibson	10:30	16:05
Gavin Grant	10:30	16:05
Jose Green		
Howard Greenman	10:30	16:05
Mollie Groom	10:30	16:05
David Halik	10:30	11:20
Russel Hawker	10:30	16:05
Ross Henning	10:30	13:30
Darren Henry		
Mike Hewitt		
Alan Hill	10:30	16:05
Sven Hocking	10:30	16:05
Ruth Hopkinson	10:30	16:05
Atiquel Hoque	10:30	16:05
Jon Hubbard	10:30	16:05
Chris Hurst	10:30	16:05

Peter Hutton	10:30	16:05
Hayley Illman	10:30	16:05
Tony Jackson	10:30	16:05
Simon Jacobs	10:30	16:05
George Jeans		
Bob Jones		
Johnny Kidney	10:30	16:05
Carole King	10:30	16:05
Gordon King	10:30	15:30
Edward Kirk	10:30	16:05
Jerry Kunkler	10:30	16:05
Jacqui Lay	10:30	16:05
Jim Lynch	10:30	15:45
Brian Mathew	10:30	16:05
Laura Mayes	10:30	16:05
Ian McLennan	10:30	13:00
Nick Murry	10:30	16:05
Christopher Newbury	10:30	12:50
Paul Oatway	10:30	13:00
Steve Oldrieve	10:30	14:25
Ashley O'Neill		
Stewart Palmen	10:30	16:05
Andy Phillips	10:30	16:05
Horace Prickett	10:30	16:05
Leo Randall	10:30	16:05
Fleur de Rhe-Philipe	10:30	16:05
Pip Ridout	10:30	16:05
Ricky Rogers		
Tom Rounds	10:30	16:05
Jane Scott	10:30	16:05
Jonathon Seed	10:30	14:45
James Sheppard	10:30	16:05
John Smale	10:30	16:05
Toby Sturgis	10:30	16:05
Melody Thompson	10:30	16:05
John Thomson	10:30	16:05
Ian Thorn	10:30	16:05
Tony Trotman	10:30	16:05
John Walsh	10:30	16:05
Bridget Wayman	10:30	16:05
Fred Westmoreland	10:30	16:05
Philip Whalley	10:30	16:05
Stuart Wheeler	10:30	16:05
Roy While	10:30	16:05
Philip Whitehead	10:30	16:05
Suzanne Wickham	10:30	16:05
Christopher Williams	10:30	16:05
Graham Wright	10:30	16:05
Robert Yuill	10:30	16:05

This page is intentionally left blank

Wiltshire Council

Council

25 February 2020

Petitions Update

Petitions Received

As of 13 February 2020, 5 new petitions have been received by Wiltshire Council since the last report to Council on 26 November 2019.

Proposal

That Council notes this update on petitions.

Lisa Moore
Democratic Services Officer

This page is intentionally left blank

NAME	DATE RECEIVED	RESPONDENTS	ACTION
Barton Park/College Fields, Marlborough Public Open Space	10/10/19	207	Petitioner presented to Marlborough Area Board and a response was provided that explained Marlborough was included in a scheme to assess sites for asset transfers, for consideration in a later tranche in 2020.
Shaftesbury Drove -Flytipping Issue and request for ongoing maintenance/clearance.	02/12/19	201	<p>Following a site inspection by the Countryside Access Team, the Enforcement Team liaised with Wilton Estate to arrange clearance of any Flytipped waste in a joint operation.</p> <p>Petitioner advised the council was only currently able to undertake urgent safety works on public rights of way, and therefore could not provide an ongoing maintenance plan for the area.</p>
Waiting Restriction on Frome Road, Trowbridge – Concerns around road safety due to inconsiderate parking.	04/12/19	177	Petitioner advised to refer the matter to the Community Area Transport Group via the Parish Council.
Coaches using Whistley Road, Potterne as a rat run.	06/12/19	48	<p>Coaches were found to be from a private company.</p> <p>Petitioner advised to refer the matter to the Community Area Transport Group via the Parish Council.</p>
Winsley Bypass – Reduced speed request from 50mph to 40mph.	16/12/19	1207	Highways confirmed there has been no changes to the area since the previous road speed assessment, the current speed limit was considered appropriate. The Local Member is in contact with the Cabinet Member on the matter.

This page is intentionally left blank

Wiltshire Council

Council

25 February 2020

Subject: Treasury Management Strategy 2020/2021

Cabinet member: Councillor Simon Jacobs – Cabinet Member for Finance and Procurement

Key Decision: Non Key

Executive Summary

This report presents the Treasury Management Strategy for 2020/2021 including:

- a) Prudential and Treasury Indicators for the next three years
- b) Debt management decisions required for 2020/2021 that do not feature within the Prudential or Treasury Indicators (paragraphs 72 to 76)
- c) Minimum Revenue Provision Policy 2020/2021
- d) Annual Investment Strategy for 2020/2021

This report has been prepared in accordance with CIPFA Code of Practice for Treasury Management in the Public Services 2011, as revised December 2017. Any relevant changes within the code of practice have been reflected within the Treasury Management Strategy 2020/2021. This report was endorsed by Cabinet on 4 February and the report to Cabinet is included below.

Proposals

That Council:

- a) Adopt the Minimum Revenue Provision Policy (paragraph 32 – 34)
- b) Adopt the Prudential and Treasury Indicators (paragraphs 24 – 31, 40 – 48 and Appendix A)
- c) Adopt the Annual Investment Strategy (paragraph 77 onwards).
- d) Delegate to the Director of Finance and Procurement the authority to vary the amount of borrowing and other long-term liabilities within the Treasury Indicators for the Authorised Limit and the Operational Boundary
- e) Authorise the Director of Finance and Procurement to agree the restructuring of existing long-term loans where savings are achievable or to enhance the long-term portfolio
- f) Agree that short term cash surpluses and deficits continue to be managed through temporary loans, deposits and money market funds
- g) Agree that any surplus cash balances not required to cover borrowing are placed in the most appropriate specified or non-specified investments, particularly where this is more cost effective than short term deposits and delegate to the Director of Finance and Procurement the authority to select such funds
- h) Adopt the Third Party Loans Policy (paragraph 93 and Appendix F)

Reasons for Proposals

To enable the Council to agree a Treasury Management Strategy for 2020/2021 and set Prudential Indicators that comply with statutory guidance and reflect best practice.

Alistair Cunningham
Chief Executive Officer – Place

Terence Herbert
Chief Executive Officer - People

Wiltshire Council

Cabinet

4 February 2020

Subject: Treasury Management Strategy 2020/2021

Cabinet member: Councillor Simon Jacobs – Cabinet Member for Finance and Procurement

Key Decision: Non Key

PURPOSE OF REPORT

1. This report asks the Cabinet to consider and recommend that the Council approve the Prudential and Treasury Indicators, together with the Treasury Management Strategy for 2020/2021.

Background

2. The Council is required to operate a balanced budget. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in appropriately risk assessed counterparties or instruments commensurate within the Council's risk appetite set out in the Strategy, providing adequate liquidity initially before considering investment return.
3. The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer-term cash flow planning, to ensure that the Council can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans, or using longer-term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn may be restructured to meet Council risk or cost objectives.
4. The contribution that the treasury management function makes to the Council is critical, as the balance of debt and investment operations ensure liquidity or the ability to meet spending commitments as they fall due, either on day to day revenue or for larger capital projects. The treasury operations will see a balance of the interest costs of debt and the investment income arising from cash deposits affecting the available budget. Since cash balances generally result from reserves and

balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal will in effect result in a loss to the General Fund Balance.

5. Whilst any commercial initiatives or loans to third parties will impact on the treasury function, these activities are generally classed as non-treasury activities, (arising usually from capital expenditure), and are separate from the day to day treasury management activities. Further details on non-financial investments are given in the Capital Strategy 2020/2021.
6. CIPFA defines treasury management as:

“The management of the local authority’s borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”

Reporting Requirements - Capital Strategy

7. The CIPFA revised 2017 Prudential and Treasury Management Codes require for 2019/2020, all local authorities to prepare an additional report, the capital strategy, which will provide the following,
 - a high-level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
 - an overview of how the associated risk is managed
 - the implications for future financial sustainability
8. The aim of the capital strategy is to ensure that all members fully understand the overall long-term policy objectives and resulting capital strategy requirements, governance procedures and risk appetite.
9. The capital strategy is reported separately from the Treasury Management Strategy Statement; non-treasury investments will be reported through the former. This ensures the separation of the core treasury function under security, liquidity and yield principles, and the policy and commercialism investments usually driven by expenditure on an asset.
10. The capital strategy will show,
 - The corporate governance arrangements for these types of activities;
 - Any service objectives relating to the investments;
 - The expected income, costs and resulting contribution;
 - The debt related to the activity and the associated interest costs;
 - The payback period (MRP policy);

- For non-loan type investments, the cost against the current market value;
 - The risks associated with each activity.
11. Where a physical asset is being bought, details of market research, advisers used, (and their monitoring), ongoing costs and investment requirements and any credit information will be disclosed, including the ability to sell the asset and realise the investment cash.
 12. Where the Council has borrowed to fund any non-treasury investment, there should also be an explanation of why borrowing was required and why the MHCLG Investment Guidance and CIPFA Prudential Code have not been adhered to.
 13. If any non-treasury investment sustains a loss during the final accounts and audit process, the strategy and revenue implications will be reported through the same procedure as the capital strategy.
 14. To demonstrate the proportionality between the treasury operations and the non-treasury operations, high level comparators are shown throughout this report.

Reporting Requirements – Treasury Management Reporting

15. Each year, the Council is required to receive and approve, as a minimum, three main reports, which incorporate a variety of policies, estimates and actuals.
 - a) Treasury Management Strategy Statement including prudential and treasury indicators, which covers the following,
 - the capital plans (including prudential indicators);
 - a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
 - the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
 - an investment strategy (the parameters on how investments are to be managed).
 - b) Mid-year Treasury Management Report, which will update members with the progress of the capital position, amending prudential indicators as necessary, and whether any policies require revision.
 - c) Annual Treasury Report, which is an outturn position document that provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy for the financial year.

Treasury Management Strategy 2020/2021

16. The strategy for 2020/2021 covers two main areas,

Capital Issues

- the capital expenditure plans and the associated prudential indicators;
- the minimum revenue provision (MRP) policy.

Treasury Management Issues

- the current treasury position;
- treasury indicators which limit the treasury risk and activities of the Council;
- prospects for interest rates;
- the borrowing strategy;
- policy on borrowing in advance of need;
- debt rescheduling;
- the investment strategy;
- creditworthiness policy; and
- the policy on use of external service providers.

17. These elements cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, MHCLG Guidance, the CIPFA Treasury Management Code and MHCLG Investment Guidance.

Training

18. The CIPFA Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for scrutiny. Training will be arranged as required.

19. The training needs of treasury management officers are periodically reviewed.

Treasury Management Consultants

20. The Council uses Link Asset Services - Treasury Solutions, as its external treasury management advisors.

21. The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external service providers. All decisions will be undertaken with regards to all available information, including, but not solely, our treasury advisers.

22. It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.
23. The scope of investments within the Councils operations now includes both conventional treasury investments (the placing of residual cash from the Council's functions), and more commercial type investments, such as investment properties. The commercial type investments may require specialist advisers, and the Council will appoint external advisors appropriate to the activity.

Capital Prudential Indicators (2020/2021 – 2022/2023)

24. The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.

Capital Expenditure

25. This indicator shows the anticipated level of capital expenditure for the five years 2018/2019 to 2022/2023. The Capital Programme 2020/2021 will be submitted to Cabinet and Council in February 2020. The estimates for future years are based on indicative figures as part of the Capital Programme, and are therefore subject to change.

Capital Expenditure	2018/2019 Actual £million	2019/2020 Estimate £million	2020/2021 Estimate £million	2021/2022 Estimate £million	2022/2023 Estimate £million
General Fund	91.313	129.100	192.352	72.756	85.111
Housing Revenue Account (HRA)	14.980	14.858	40.482	30.371	11.534
Commercial Activities/Non-financial investments*	0.000	4.585	28.700	26.700	29.950
Total	106.293	148.543	261.534	129.827	126.595

* Commercial activities/non-financial investments relate to areas such as capital expenditure on investment properties, loans to third parties etc.

26. The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

Financing of Capital Expenditure	2018/2019 Actual £million	2019/2020 Estimate £million	2020/2021 Estimate £million	2021/2022 Estimate £million	2022/2023 Estimate £million
Capital Receipts	11.602	8.779	8.612	2.180	0.000
Flexible Use of Capital Receipts	0.000	4.351	5.190	3.318	0.000
Capital Grants & Contributions	78.159	75.623	55.302	32.839	57.570
Capital Reserves	0.000	0.000	0.000	0.000	0.000
Revenue	0.000	0.000	0.000	0.000	0.000
HRA (excluding borrowing)	14.499	10.635	14.148	11.149	11.149
Total Financing (non-borrowing)	104.260	99.388	83.252	49.486	68.719
HRA Borrowing	0.00	0.000	14.694	14.841	0.385
Net Financing Need (Borrowing) – General Fund	2.033	49.155	162.588	65.500	57.491
Net Financing Need (Borrowing) – Total	2.033	49.155	177.282	80.341	57.876
Total Financing	106.293	148.543	261.534	12.827	126.595

The Council's Borrowing Need (the Capital Financing Requirement)

27. The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's indebtedness and so its underlying borrowing need. Any capital expenditure which has not immediately been paid for, through a revenue or capital resources, will increase the CFR.
28. The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with the asset life, and so charges the economic consumption of capital assets as they are used.
29. The CFR includes any other long-term liabilities (e.g. PFI schemes, finance leases). While these increase the CFR, and therefore the Council's borrowing requirement, these types of schemes include a borrowing facility by the lease PFI, PPP lease provider, and so the Council is not required to separately borrow for these schemes. The Council currently has £72.395 million of such schemes within the CFR.

30. The CFR projections are summarised in the table below,

	2018/2019 Actual £million	2019/2020 Estimate £million	2020/2021 Estimate £million	2021/2022 Estimate £million	2022/2023 Estimate £million
CFR – General Fund	402.122	436.906	581.433	622.590	655.556
CFR – HRA	119.864	111.865	126.558	141.399	141.783
Total CFR	521.986	548.771	707.991	763.989	797.399
Movement in CFR	(17.342)	26.785	159.222	55.998	33.350
Represented by					
Net Financing Need (General Fund)	2.033	49.155	162.588	65.500	57.491
Net Financing Need (HRA)	0.000	0.000	14.694	14.841	0.385
Total Net Financing Need	2.033	49.155	177.282	80.341	57.876
Less MRP/VRP	(10.988)	(10.789)	(14.479)	(18.762)	(20.945)
Less Other Long Term Liabilities (PFI)	(3.351)	(3.581)	(3.581)	(3.581)	(3.581)
Less Other Financing Movements	(5.036)	(8.000)	0.000	(2.000)	0.000
Movement in CFR	(17.342)	26.785	159.222	55.998	33.350

31. A key aspect of the regulatory and professional guidance is that elected members are aware of the size and scope of any commercial activity in relation to the Council's overall financial position. The capital expenditure figures shown in paragraph 25 above and these details demonstrate the scope of this activity and, by approving these figures, consideration is given to the scale, proportionate to the Council's remaining activity.

Minimum Revenue Provision (MRP) Policy Statement

32. The minimum revenue provision (MRP) is the amount set aside for the repayment of the debt as a result of borrowings made to finance capital expenditure.

33. The Council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the MRP), although it is also allowed to undertake additional voluntary revenue payments (VRP) if required.

34. MHCLG regulations have been issued which require full Council to approve an MRP statement in advance of each year. The following MRP policy (section a-d) was approved in October 2017 following a full review. It is recommended that Council approves the same MRP policy with the addition of section e for 2020/2021:

- a. In respect of the Council's supported borrowing: MRP will be provided for in accordance with existing practice outlined in the former regulations but on a 2% straight-line basis, i.e. provision for the full repayment of debt over 50 years.
- b. MRP for capital expenditure incurred wholly or partly by unsupported (prudential) borrowing or credit arrangements: equal Instalments to be determined by reference to the expected life of the asset. Asset life is deemed to begin once the asset becomes operational. MRP will commence from the financial year following the one in which the asset becomes operational.
- c. MRP in respect of unsupported (prudential) borrowing: equal Instalments taken to meet expenditure, which is treated as capital expenditure by virtue of either a capitalisation direction or regulations, will be determined in accordance with the asset life method as recommended by the statutory guidance.
- d. The Council retains the right to make additional voluntary payments to reduce debt if deemed prudent.
- e. Where the Council issues capital loans to third parties (including to its own commercial companies), the expectation is that the funds lent will be re-paid in full at a future date. Therefore, no MRP will set aside in respect of these loans. MRP will however need to be applied as appropriate if it is determined at any point that any such loan will not be re-paid in full. The position of each loan will be reviewed on an annual basis by Chief Finance Officer.

Borrowing

35. The capital expenditure plans set out in paragraph 25 provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity and the Council's capital strategy. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury/prudential indicators, the current and projected debt positions and the annual investment strategy.

Current Portfolio Position

36. The overall treasury management portfolio as at 31 March 2019 and for the position as at 30 November 2019 are shown below for both borrowing and investments.

Treasury Portfolio				
	Actual 31/03/2019 £million	Actual 31/03/2019 %	Current 30/11/2019 £million	Current 30/11/2019 %
Treasury Investments				
Banks	48.000	47.10	66.000	50.57
Local Authorities	39.000	38.27	10.000	7.66
Money Market Funds	14.907	14.63	54.502	41.76
Total Treasury Investments	101.907	100.00	130.502	100.00
Treasury Borrowing				
PWLB	282.123	82.22	282.123	82.22
LOBOs	61.000	17.78	61.000	17.78
Total External Borrowing	343.123	100.00	343.123	100.00
Net Treasury Investments/ (Borrowing)	(241.206)		(212.621)	

37. The Council's forward projections for borrowing are summarised in the tables below. These tables show the actual external gross debt, against the underlying capital borrowing need (the CFR), highlighting any over or under borrowing, for both the general fund and the HRA.

External Debt General Fund	2018/2019 Actual £million	2019/2020 Estimate £million	2020/2021 Estimate £million	2021/2022 Estimate £million	2022/2023 Estimate £million
Debt at 1 April	209.123	229.123	278.278	440.866	504.366
Expected Change in Debt	20.000	49.155	162.588	63.500	57.491
Debt at 31 March	229.123	278.278	440.866	504.366	561.587
CFR	402.122	436.906	581.433	622.590	655.556
PFI Liability	72.395	68.814	65.233	61.652	58.071
Under/ (Over) Borrowing	100.604	89.814	75.334	56.572	35.898

External Debt HRA	2018/2019 Actual £million	2019/2020 Estimate £million	2020/2021 Estimate £million	2021/2022 Estimate £million	2022/2023 Estimate £million
Debt at 1 April	118.810	114.000	106.000	120.694	135.535
Expected Change in Debt	(4.810)	(8.000)	14.694	14.841	0.385
Debt at 31 March	114.000	106.000	120.694	135.535	135.920
CFR	119.864	111.864	126.558	141.399	141.784
Under/ (Over) Borrowing	5.864	5.864	5.864	5.864	5.864

- 38. Within the range of prudential indicators there are a number of key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2020/2021 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue or speculative purposes.
- 39. The Director of Finance and Procurement confirms that the Council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this report.

Treasury Indicators: Limits to Borrowing Activity

Operational Boundary

- 40. The operational boundary is the limit beyond which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on the levels of actual debt and the ability to fund under borrowing by other cash resources.
- 41. The operational boundary is based on a prudent estimate of the most likely maximum level of external borrowing for both capital expenditure and cash flow purposes, which is consistent with other budget proposals.
- 42. The basis of the calculation for HRA borrowing 2020/2021 is the HRA CFR.

Operational Boundary	2019/2020 £million	2020/2021 £million	2021/2022 £million	2022/2023 £million
General Fund Debt	488.951	605.014	648.173	679.137
HRA Debt	123.122	126.558	141.399	141.784
Other Long-Term Liabilities	0.200	0.200	0.200	0.200
Total	612.273	731.772	789.772	821.121

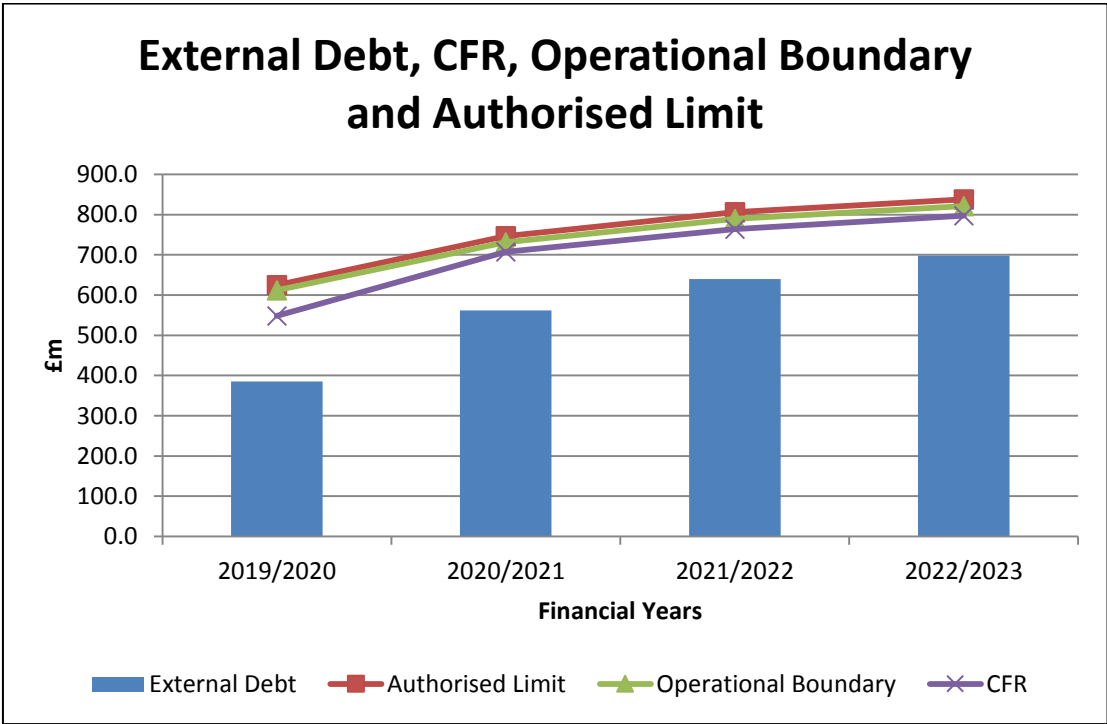
Authorised Limit for External Debt

- 43. The authorised limit for debt is a key indicator which represents a control on the maximum level of borrowing. This represents a legal limit beyond which external debt is prohibited, and this limit needs to be set or revised by the full Council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.

- 44. The authorised limit is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils’ plans, or those of a specific council, although this power has not yet been exercised.
- 45. The authorised limit is the operational boundary, including an allowance for unplanned and irregular cash movements.
- 46. It is proposed that an allowance of 2.5% is continued for General Fund borrowing for 2020/2021 to 2022/2023, but this will be kept under review. The allowance provides for the possibility of additional borrowing during the year as a result of Government support for further schemes and provides headroom where the projection proves too optimistic (payments made earlier or receipt of income delayed against that forecast).
- 47. There is no allowance in respect of HRA borrowing, so it has been decided that this borrowing should not exceed the CFR.

Authorised Limit	2019/2020 £million	2020/2021 £million	2021/2022 £million	2022/2023 £million
General Fund Debt	501.175	620.139	664.377	696.115
HRA Debt	123.122	126.558	141.399	141.784
Other Long-Term Liabilities	0.200	0.200	0.200	0.200
Total	624.497	746.897	805.976	838.099

- 48. The following bar/line graph shows external debt against the CFR, operation boundary and authorised limit.



Monitoring and Reporting of the Prudential Indicators

49. Progress will be monitored throughout the year, particularly against the two borrowing limits (operational boundary and authorised limit) above. Cabinet will be kept informed of any issues that arise, including potential or actual breaches.
50. The elements within the Authorised Limit and the Operational Boundary, for borrowing and other long-term liabilities require the approval of the Council. In order to give operational flexibility, members are asked to delegate to the Director of Finance and Procurement, the ability to effect movements between the two elements where this is considered necessary. Any such changes will be reported to members.
51. The operational boundary is a key management tool for in-year monitoring. It will not be significant if the operational boundary is breached temporarily on occasions due to variations in cash flow. However, a sustained or regular trend above the operational boundary is considered significant and will lead to further investigation and action as appropriate.
52. Any breach of the operational boundary will be reported to members at the earliest meeting following the breach. The authorised limit will in addition need to provide headroom over and above the operational boundary, sufficient for unusual cash movements, for example, and should not be breached.

Borrowing Strategy

53. The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need, (the Capital Financing Requirement) has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow have been used as a temporary measure (internal borrowing). This strategy is prudent, as investment returns are low and counterparty risk is still an issue that needs to be considered.
54. Against this background and the risks within the economic forecast, caution will be adopted with the 2020/2021 treasury operations. The Director of Finance and Procurement will, through delegation and reporting, monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:
 - a) if it was considered that there was a significant risk of a sharp fall in long and short-term rates, (e.g. due to a marked increase of risks around relapse into recession or of risks of deflation), then long term borrowings will be postponed, and potential rescheduling from fixed rate funding into short term borrowing will be considered.

- b) if it was considered that there was a significant risk of a much sharper rise in long and short-term rates than that currently forecast, perhaps arising from an acceleration in the rate of increase in central rates in the USA and UK, an increase in world economic activity or a sudden increase in inflation risks, then the portfolio position will be re-appraised. Most likely, fixed rate funding will be drawn whilst interest rates are lower than projected to be in the next few years.

55. Any decisions will be reported to Cabinet at the earliest meeting following the decision.

Rate and Timing of Borrowing

56. In 2020/2021 one (HRA PWLB) loan of £4 million will mature and become repayable (March 2021). This loan may be refinanced in 2021 depending on the Council's overall internal borrowing position, and the nature of the current economic climate.

57. The timing of any borrowing is crucial in terms of interest rates and the potential to minimise interest costs. Prior to any actual borrowing the treasury team will, in conjunction with our treasury advisers, proactively manage the interest rate position, using all information available to inform the borrowing decision.

58. It is, of course, not always possible to obtain the lowest rates of interest, as there is a risk that unforeseen events can significantly alter the level of rates, however, ongoing active monitoring of rates will mitigate against this risk.

59. In supporting the capital programme, the Council will consider all borrowing options, such as:

- a) internal borrowing, using medium term cash balances;
- b) fixed rate Public Works Loan Board (PWLB) borrowing;
- c) long term fixed rate market loans.

60. The decision will be made whilst maintaining an appropriate balance between PWLB and market debt in the debt portfolio.

Sources of Borrowing/Types of Borrowing

61. Following the decision by the PWLB on 9 October 2019 to increase the margin over gilt yields by 100 basis points to 180 basis points on loans lent to local authorities, consideration will also be given to sourcing funding at cheaper rates from the following,
- Local Authorities (primarily shorter dated maturities)
 - Financial Institutions (primarily insurance companies and pension funds but also some banks)
 - Municipal Bond Agency (no issuance at present, but there is potential)
62. The degree which any of these options proves cheaper than PWLB certainty rate is still evolving at this current time, but our advisors will keep the Council informed.

Lender Option Borrower Option (LOBO) Market Loans

63. Wiltshire Council currently has borrowings of £61 million in LOBO loans.
64. There are two main types of LOBO loan (of which the Council has both in its portfolio)
- a) a loan with an 'initial period' at a relatively low rate of interest, on the completion of which, the rate will automatically increase to a 'secondary rate' under the terms of the loan agreement. The interest rate is then subject to 'call option dates' at certain predetermined stages (e.g. every six months, every five years) over the life of the loan, at which time the lender has the option to set a revised interest rate and the borrower has the option to repay the loan without penalty;
 - b) a loan subject to 'call option dates' only (i.e. there is no 'secondary rate') at which time the lender has the option to raise the interest rate and the borrower has the option to repay the loan without penalty.
65. If the lender exercises his option to revise the interest rate at one of the 'call option dates', the Council's strategy is that it will always exercise its option to repay the loan. Consideration will then be given to refinancing the debt where the overall level of debt prior to the repayment needs to be maintained.
66. In the current market of relatively low interest rates and very little significant upward movement in rates predicted in the near future, it is unlikely that the loans would be called in the short to medium term.

Short Term Cash Deficits

67. Temporary loans, where both the borrower and lender have the option to redeem the loan within twelve months, are used to offset short term revenue cash deficits. They may also be used to cover short term capital requirements until longer term loans become more cost effective. The majority of these loans will be at fixed interest rates, maturing on specific dates. The strategy is that the Council shall utilise temporary loans for any short-term cash deficits that arise in respect of revenue and/or capital.

Short Term Cash Surpluses

68. It is anticipated that temporary short term (up to three months) cash surpluses will arise regularly during the year, due to timing differences between income streams and payments. Investment of these surpluses will be in specific investments (e.g. short-term Sterling investments of less than one year). Such investments will normally be short term deposits maturing on specific dates that reflect cash flow requirements at the date the deposit is made. However, under certain market conditions, money market funds will be used, particularly if they provide improved returns.

Longer Term Cash Surpluses (over three months, up to one year)

69. Some cash surpluses, for example core revenue balances, net creditors, accrued reserves and special funds such as those for insurance and PFI can be invested on a long-term basis. These cash surpluses may be used for capital financing requirements, where longer term interest rates mean that it is less cost effective to take out longer term loans.
70. Improved returns may be obtained by placing these surpluses in money market funds. The Director of Finance and Procurement has delegated authority to select money market funds and appoint external cash managers within the current approved strategy and it is proposed that this authority is retained.
71. The proposed Investment Strategy for 2020/2021 continues to include the use of unspecified investments (e.g. more than 12 months to maturity and for which external professional advice is required) that the Council's treasury adviser may recommend for investment of longer term cash surpluses.

Policy on Borrowing in Advance of Need

72. The Prudential Code issued by CIPFA requires that a council should not borrow more than, or in advance of need purely to profit from the investment of the extra sums borrowed. This Statutory Guidance requires that where borrowing in advance is enacted by a council that the rationale for the decision is clearly set out to ensure that external auditors, tax payers and interested parties are able to hold the council to account for the reasons for the borrowing. This will be included in the decision-making process.

Debt Rescheduling

73. As short term borrowing rates will be cheaper than longer term fixed interest rates, there may be potential opportunities to generate savings by switching from long term debt to short term debt. However, these savings will need to be considered in the light of the current treasury position and the size of the debt repayment cost (i.e. premiums for early repayment).

74. The reasons for any rescheduling to take place will include:

- a) the generation of cash savings and/or discounted cash flow savings;
- b) helping to fulfil the treasury strategy;
- c) enhancing the balance of the portfolio (the maturity profile and/or the balance of volatility).

75. Consideration will also be given to identify if there is any residual potential for making savings by running down investment balances to repay debt early as short term rates on investments are likely to be lower than rates paid on current debt.

76. All rescheduling will be reported to members in a treasury report at the earliest meeting following its action.

Annual Investment Strategy

Investment Policy – Management of Risk

77. The MHCLG and CIPFA have extended the meaning of investments to include both financial and non-financial investments. This report deals solely with financial investments, (managed by the treasury management team). Non-financial investments, essentially the purchase of income yielding assets, are covered in the Capital Strategy (a separate report).
78. Council's investment policy has regard to the following,
- MHCLG Guidance on Local Government Investments (“the Guidance”)
 - CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2017 (“the Code”).
 - CIPFA Treasury Management Guidance Notes 2018.
79. The Council's investment priorities will be security first, portfolio liquidity second, then yield (return).
80. The above guidance from the MHCLG and CIPFA place a high priority on the management of risk. The Council has adopted a prudent approach to managing risk and defines its risk appetite by the following means,
- a) Minimum acceptable credit criteria are applied in order to generate a list of highly creditworthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the short term and long-term ratings.
 - b) Other information ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To achieve this consideration the Council will engage with its advisors to maintain a monitor on market pricing such as credit default swaps and overlay that information on top of the credit ratings.
 - c) Other information sources used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.

- d) The Council has defined the list of types of investment instruments that the treasury management team are authorised to use. There are two lists in Appendix B under the categories of 'specified' and 'non-specified' investments.
- a) Specified Investments are those with a high level of credit quality and subject to a maturity limit of one year.
 - b) Non-specified investments are those with less high credit quality, may be for periods in excess of one year, and/or are more complex instruments which require greater consideration by members and officers before being authorised for use. Once an investment is classified as non-specified, it remains so until maturity. i.e. an 18 month deposit would still be non-specified even if it only has 11 months left to maturity.
- e) Non-specified investments limit. The Council has determined that it will limit the maximum total exposure to non-specified investments to be £30 million, in line with the limits for investments for longer than 365 days.
- f) Lending Limits, (amounts and maturity) for each counterparty will be set through applying the matrix table in paragraph 86 and 91.
- g) The Council will set a limit for the amount of its investments which are invested for longer than 365 days (see paragraph 106)
- h) Investments will only be placed with counterparties from countries with a specified minimum sovereign rating (see paragraph 97)
- i) The Council has engaged external consultants (see paragraph 20) to provide expert advice on how to optimise an appropriate balance on security, liquidity and yield, given the risk appetite of the Council in the context of the expected level of cash balances and need for liquidity throughout the year.
- j) All investments will be denominated in sterling.
- k) As a result of the change in accounting standards from 2018/2019 under IFRS 9, the Council will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018, the MHCLG concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years commencing from 1 April 2018)

81. The Council will also pursue value for money in treasury management and will monitor the yield from investment income against appropriate benchmarks for investment performance (see paragraph 102). Regular monitoring of investment performance will be carried out during the year.
82. Property funds offer enhanced returns over the longer term, but are more volatile in the short term. These allow the Authority to diversify into asset classes other than cash without the need to own and manage the underlying investments. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Authority's investment objectives will be monitored regularly.
83. The Council will consider an investment in the CCLA Property Fund (a fund tailored to Local Authorities), and investment limits have been set as per non-specified investments. This would provide additional diversification of the Council's investments and the potential for earning a higher investment yield on the core investment balance.

Changes in Risk Management Policy from 2019/2020

84. There have been no changes in the Risk Management Policy from last year.

Creditworthiness Policy

85. The Council applies the creditworthiness service provided by Link Asset Services. This service employs a sophisticated modelling approach, utilising credit ratings from the three main credit rating agencies - Fitch, Moodys and Standard & Poors. The credit ratings of counterparties are supplemented with the following overlays:
- Credit watches and credit outlooks from credit rating agencies;
 - CDS spreads to give early warning of likely changes in credit ratings;
 - Sovereign ratings to select counterparties from only the most creditworthy countries.
86. The above modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the suggested duration for investments. The Council will therefore use counterparties within the following durational bands:

Colour	Maximum Investment
Yellow	5 years
Dark Pink	5 years (for ultra-short dated bond funds with a credit score of 1.25)
Light Pink	5 years (for ultra-short dated bond funds with a credit score of 1.5)
Purple	2 years
Blue	1 year (only applies to nationalised or semi nationalised UK banks)
Orange	1 year
Red	6 months
Green	100 days
No colour	not to be used

87. The Link Asset Services creditworthiness service uses a wider array of information other than just primary ratings. Furthermore, by using a risk weighted scoring system, it does not give undue preponderance to just one agency's ratings.
88. Typically, the minimum credit ratings criteria the Council use will be a Short Term rating (Fitch or equivalent) of F1 and a Long Term rating of A-. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings but may still be used. In these instances, consideration will be given to the whole range of ratings available, or other topical market information, to support their use.
89. All credit ratings will be monitored daily. The Council is alerted to changes to ratings of all three agencies through its use of the Link Asset Services' creditworthiness service.
- If a downgrade results in the counterparty/investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.
 - In addition to the use of credit ratings the Council will be advised of information in movements in credit default swap spreads against the iTraxx benchmark and other market data on a daily basis via its Passport website, provided exclusively to it by Link Asset Services. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.
90. Sole reliance will not be placed on the use of this external service. In addition, the Council will also use market data and market information, information on any external support for banks to help support its decision making process.
91. In addition to the above criteria, the following limits will be applied to the total cumulative investments placed with an individual institution (or group of institutions where there is common ownership):

Monetary Limit	Counterparties
Up to £15 million	UK incorporated banks with a long term credit rating of at least AA
	Overseas banks that have a long term credit rating of at least AA
	Multilateral development banks
	Local authorities and other public bodies
	Money market funds
Up to £12 million	Government backed UK banks and UK building societies and their subsidiaries
Up to £10 million	UK incorporated banks (that have a long term credit rating of less than AA but which also satisfy the credit rating conditions within this Strategy);
	Overseas banks (that have a long term credit rating of less than AA but which also satisfy the credit rating conditions within this Strategy)
	UK Building societies with long term credit rating of at least A
	Government backed overseas banks and their subsidiaries

Changes in Creditworthiness Policy from 2019/2020

92. The following criteria has been changed from last year,

- a. Due to operational requirements, monetary lending limits for HSBC were adjusted to distinguish between potential fixed term investments and operational balances held within the Council's bank account. The following limits were approved by Full Council on 26 November 2019.
 - £10.000 million with HSBC in respect of fixed term investments
 - £10.000 million with HSBC in respect of balances held on an overnight basis.

Third Party Loans

93. The Council has the power to lend monies to third parties. Appendix F sets out the Council's framework within which it may consider advancing loans to third party organisations.

UK Bank – Ring Fencing

94. The largest UK banks, (those with more than £25 billion of retail/Small and Medium Sized Enterprise (SME) deposits), as required, by UK law, to separate core retail banking services from their investment and international investment activities. This is known as 'ring-fencing'. While smaller banks with less than £25 billion in deposits are exempt, they can choose to opt up. Several banks are very close to the threshold already and so may come into scope in the future regardless.

95. Ring-fencing is a regulatory initiative created in response to the global financial crisis. It mandates the separation of retail and SME deposits from investment banking, to improve the resilience and resolvability of banks by changing their structure. In general, simpler, activities offered from within a ring-fenced bank, (RFB), will be focused on lower risk, day-to-day core transactions, whilst more complex and “riskier” activities are required to be housed in a separate entity, a non-ring-fenced bank, (NRFB). This is intended to ensure that an entity’s core activities are not adversely affected by the acts or omissions of other members of its group.
96. While the structure of the banks included within this process may have changed, the fundamentals of credit assessment have not. The Council will continue to assess the new-formed entities in the same way that it does others and those with sufficiently high ratings, (and any other metrics), will be considered for investment purposes.

Other Limits

97. Due care will be taken to consider the exposure of the Council’s total investment portfolio to non-specified investments, countries, groups and sectors.
 - a. Non-specified investment limit. The Council has determined that it will limit the maximum total exposure to non-specified investments as being £30 million.
 - b. Country limit. The Council has determined that it will only use approved counterparties from the UK and countries with a minimum sovereign credit rating of AA- from Fitch (or equivalent). The list of countries that qualify using this credit criteria as at the date of this report are shown in Appendix C. This list will be added to, or deducted from, by officers should ratings change in accordance with this policy.
 - c. Other limits. Limits in place above will apply to a group of counterparties.

Investment Strategy

98. Investments will be made with reference to the core balance and cash flow requirements and the outlook for short term interest rates (i.e. rates for investments up to 12 months)
99. Greater returns are usually obtainable by investing for longer periods. While most cash balances are required to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the potential value from longer term investments will be carefully assessed.

- If it is thought that Bank Rate is likely to rise significantly within the time horizon being considered, then consideration will be given to keeping most investments as being short term
- Conversely, if it is thought that Bank Rate is likely to fall within that time period, consideration will be given to locking in higher rates currently obtainable, for longer periods.

Investment Returns Expectations

100. On the assumption that the UK and EU agree a Brexit deal, including the terms of trade, by the end of 2020, then bank rate is forecast to increase slowly over the next few years to reach 1.00% by quarter 1 of 2023.

101. Bank rate forecasts for financial year ends are as follows,

Year	Bank Base Rate
2020/2021	0.75%
2021/2022	1.00%
2022/2023	1.00%

102. The suggested budgeted investment earnings rates for returns on investments places for periods up to about 3 months during each financial year are as follows:

Year	Budgeted Earnings Rate
2019/2020	0.75%
2020/2021	0.75%
2021/2022	1.00%
2022/2023	1.25%
2023/2024	1.50%
2024/2025	1.75%
Later Years	2.25%

103. The overall balance of risks to economic growth in the UK is probably to the downside due to the weight of all the uncertainties over Brexit, as well as a softening global economic picture.

104. The balance of risks to increases in Bank Rate and the shorter term PWLB rates are broadly similar to the downside.

105. In the event that a Brexit deal is agreed with the EU and approved by Parliament, the balance of risks to economic growth and to increases in Bank Rate is likely to change to the upside.

Investment Treasury Indicator and Limit

106. This investment treasury indicator limits the total funds invested for greater than 365 days. These limits are set with regard to the Council’s liquidity requirements and to reduce the need for any unnecessary borrowing. They are based on the availability of funds after each year end.

107. The Council is asked to approve the treasury indicator and limit:

Upper Limit for Principal Sums Invested for longer than 365 days			
	2020/2021	2021/2022	2022/2023
Principal Sums Invested > 365 Days	£30m	£30m	£30m
Current Investments > 365 Days maturing in each year	£0m	£0m	£0m

108. For its cash flow generated balances, the Council will seek to utilise its HSBC overnight investment instant access account, money market funds and short dated deposits (overnight to 100 days) in order to benefit from the compounding of interest.

Investment Risk Benchmarking

109. The Council will use an investment benchmark to assess the investment performance of its investment portfolio of the relevant LIBID rate (dependant on the average duration of the fund).

End of Year Investment Report

110. At the end of the financial year, the Council will report on its investment activity as part of its Annual Treasury Report.

Overview and Scrutiny Engagement

111. The Financial Planning Task Group will consider this report on 23 January 2020, with any comments reported to the Cabinet meeting.

Safeguarding Implications

112. None have been identified as arising directly from this report.

Public Health Implications

113. None have been identified as arising directly from this report.

Procurement Implications

114. None have been identified as arising directly from this report.

Equalities Impact of the Proposal

115. None have been identified as arising directly from this report.

Environmental and Climate Change Considerations

116. Wiltshire Council will not intentionally invest in any investment that is not ethical and would not be consistent with our environmental and social policy objectives.

117. Where appropriate, the Council will consider investments that deliver environmental and social benefits, whilst maintaining our Security, Liquidity and Yield criteria.

Risks Assessment

118. The primary treasury management risks to which the Council is exposed are adverse movements in interest rates and the credit risk of its investment counterparties.

119. The Prudential & Capital Indicators and the Annual Investment Strategy take account of the forecast movement in interest rates and allow sufficient flexibility to be varied if actual movements in interest rates are not in line with the forecast.

120. The Council's treasury adviser is currently reporting the following in terms of investment and borrowing rates,

- a) Investment returns are likely to remain low during 2020/2021 with little increase in the following two years. However, if major progress is made with an agreed Brexit, then there is upside potential for earnings.
- b) Borrowing interest rates were on a major falling trend during the first half of 2019/2020 but then jumped up by 100 basis points (bps) in October 2019. The policy of avoiding new borrowing by running down spare cash balances has served local authorities well over the past few years. However, the unexpected increase of 100 bps in PWLB rates requires a major rethink of local authority treasury management strategy and risk management.
- c) Now that the gap between longer term borrowing rates and investment rates has materially widened, and in the long term Bank Rate is not expected to rise above 2.5%.

- d) While the Council will not be able to avoid borrowing to finance new capital expenditure, to replace maturing debt and the rundown of reserves, there will be a cost of carry (the difference between higher borrowing costs and lower investment returns), to any new short or medium term borrowing that causes a temporary increase in cash balances, and this position will, most likely, incur a revenue cost.

Financial Implications

121. These have been examined and are implicit throughout the report.

Workforce Implications

122. None have been identified as arising directly from this report.

Legal Implications

123. None have been identified as arising directly from this report.

Options Considered

124. Future consideration will be given to alternative borrowing and investment options to improve the cost effectiveness of and return on treasury activities for the Council.

125. The options in relation to the revenue and capital budgets in these proposals are fully consistent with the figures included within the budget considerations.

Proposals

126. The Cabinet is requested to recommend that the Council approves and adopts the Treasury Management Strategy for 2020/2021, as follows,

- a. Adopt the Minimum Revenue Provision Policy (paragraphs 32 – 34)
- b. Adopt the Prudential and Treasury Indicators (paragraphs 24 – 31, 40 – 48 and Appendix A)
- c. Adopt the Annual Investment Strategy (paragraph 77 onwards)
- d. Delegate to the Director of Finance and Procurement the authority to vary the amount of borrowing and other long term liabilities within the Treasury Indicators for the Authorised Limit and the Operational Boundary

- e. Authorise the Director of Finance and Procurement to agree the restructuring of existing long-term loans where savings are achievable or to enhance the long term portfolio
- f. Agree that short term cash surpluses and deficits continue to be managed through temporary loans, deposits and money market funds
- g. Agree that any surplus cash balances not required to cover borrowing are placed in the most appropriate specified or non-specified investments, particularly where this is more cost effective than short term deposits and delegate to the Director of Finance and Procurement the authority to select such funds.
- h. Adopt the Third Party Loans Policy (paragraph 93 and Appendix F)

Deborah Hindson
Interim Director, Finance and Procurement

Alistair Cunningham
Chief Executive Officer – Place

Terence Herbert
Chief Executive Officer – People

Report Author:
Stuart Donnelly, Head of Finance (Corporate)
email: stuart.donnelly@wiltshire.gov.uk

Tel: 01225 718582

Background Papers

The following unpublished documents have been relied on in the preparation of this report:

None.

Appendices

Appendix A Prudential and Treasury Indicators 2020/2021, 2021/2022 & 2022/2023
Appendix B Specified and non-specified Investments
Appendix C Approved countries for investments
Appendix D Treasury Management Scheme of Delegation
Appendix E Role of the Section 151 Officer
Appendix F Third Party Loans Policy

Capital Prudential and Treasury Indicators for 2020/2021 – 2022/2023

1. The Prudential and Treasury Management Codes and Treasury Guidelines require the Council to set a number of Prudential and Treasury Indicators for the financial year ahead. This appendix sets out the indicators required by the latest code.

Affordability Prudential Indicators

2. The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council's overall finances. The Council is asked to approve the following indicators,

Ratio of Financing Costs to Net Revenue Stream

3. This indicator identifies the trend in the cost of capital (borrowing and other long-term obligation costs net of investment income) against the net revenue stream

	2018/2019 Actual (%)	2019/2020 Estimate (%)	2020/2021 Estimate (%)	2021/2022 Estimate (%)	2022/2023 Estimate (%)
General Fund	5.9	5.8	6.8	8.8	9.8
HRA	14.4	14.1	13.4	15.9	18.6

4. The estimates in financing costs above include current commitments and the proposals in this budget report.

Maturity Structure of Borrowing

5. These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits.
6. In order to protect the Council from interest rate risk and to safeguard the continuity of treasury management financing costs, the following limits have been adopted.

Maturity Structure of Fixed Interest Rate Borrowing 2020/2021		
	Lower (%)	Upper (%)
Under 12 months	0	25
12 months to 2 years	0	25
2 years to 5 years	0	45
5 years to 10 years	0	75
10 years and above	0	100

7. In addition to the indicators (above) it is considered prudent that, under normal circumstances, no more than 15% of long term loans, excluding LOBO loans, should fall due for repayment within any one financial year and 25% in the case of LOBO loans, where maturity is deemed to be the “next call option date”.

Treasury Management Practice (TMP) 1 Credit and Counterparty Risk Management

Specified Investments.

1. All such investments will be sterling denominated, with maturities up to a maximum of 1 year, meeting the minimum 'high' quality criteria.

Non-Specified Investments.

2. These are any investments which do not meet the specified investment criteria.
3. A maximum of £30 million will be held in aggregate non-specified investments.

Credit and Counterparty Risk

4. A variety of instruments will be used, subject to the credit quality of the institution, and depending on the type of investment made, it will fall into one of the above categories.
5. The criteria applying to institutions or investment vehicles are as follows,

	Minimum credit criteria/ colour band	Maximum maturity period
Specified Investments		
DMADF – UK Government	N/A	6 months
UK Government Gilts	UK sovereign rating	12 months
UK Government Treasury Bills	UK sovereign rating	12 months
Bonds issued by multilateral development banks	AAA	6 months
Money Market Funds CNAV	AAA	Liquid
Money Market Funds LVNAV	AAA	Liquid
Money Market Funds VNAV	AAA	Liquid
Ultra Short Dated Bonds (1.25)	AAA	
Ultra Short Dated Bonds (1.5)	AAA	
Local Authorities	N/A	12 months
Term Deposits with Banks and Building Societies	Blue	12 months
	Orange	12 months
	Red	6 months
	Green	100 days
	No Colour	Not for use
Certificates of Deposit or Corporate Bonds	Blue	12 months
	Orange	12 months
	Red	6 months
	Green	100 days

	No Colour	Not for use
Gilt Funds	UK sovereign rating	
Non-Specified Investments		
Term Deposits with Banks and Building Societies	Purple Yellow	2 years 5 years
UK Government Gilts	UK sovereign rating	50 years
Property Fund (CCLA)	N/A	N/A

6. The criteria in this appendix are intended to be the operational criteria in normal times. At times of heightened volatility, risk and concern in financial markets, this strategy may be amended by temporary operational criteria further limiting investments to counterparties of a higher creditworthiness and / or restricted time limits.

Accounting treatment of investments.

7. The accounting treatment may differ from the underlying cash transactions arising from investment decisions made by this Council. To ensure that the Council is protected from any adverse revenue impact, which may arise from these differences, we will review the accounting implications of new transactions before they are undertaken.

Monitoring of Investment Counterparties

8. The credit rating of counterparties will be monitored regularly. The Council receives credit rating information (changes, rating watches and rating outlooks) from Link Asset Services as and when ratings change, and counterparties are checked promptly. On occasion ratings may be downgraded when an investment has already been made. The criteria used are such that a minor downgrading should not affect the full receipt of the principal and interest. Any counterparty failing to meet the criteria will be removed from the list immediately by the Director of Finance and Procurement, and if required new counterparties which meet the criteria will be added to the list.

Approved Countries for Investments

This list is based on those countries which have sovereign ratings of AA- or higher (the lowest rating from Fitch, Moody's and S&P is shown) and also, (except - at the time of writing - for Hong Kong, Norway and Luxembourg), have banks operating in sterling markets which have credit ratings of green or above in the Link Asset Services credit worthiness service.

Rating	Country
AAA	Australia
	Canada
	Denmark
	Germany
	Luxembourg
	Netherlands
	Norway
	Singapore
	Sweden
	Switzerland
AA+	Finland
	U.S.A.
AA	Abu Dhabi (UAE)
	France
	Hong Kong
	U.K.
AA-	Belgium
	Qatar

Treasury Management Scheme of Delegation

Full Council

1. Receiving and reviewing reports on treasury management policies, practices and activities;
2. Budget consideration and approval;
3. Approval of annual strategy.

Cabinet

1. Approval of/amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices;
2. Budget consideration and proposal;
3. Approval of the division of responsibilities;
4. Receiving and reviewing regular monitoring reports and acting on recommendations;

Scrutiny – Finance Task Group

1. Reviewing the treasury management policy and procedures and making recommendations to the responsible body.

The Treasury Management Role of the Section 151 Officer

1. Recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance;
2. Submitting regular treasury management policy reports;
3. Submitting budgets and budget variations;
4. Receiving and reviewing management information reports;
5. Reviewing the performance of the treasury management function;
6. Ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function;
7. Ensuring the adequacy of internal audit, and liaising with external audit;
8. Approving the selection of external service providers and agreeing terms of the appointment.
9. Preparation of a capital strategy to include capital expenditure, capital financing, non-financial investments and treasury management, with a long term timeframe (say 20+ years – to be determined in accordance with local priorities.)
10. Ensuring that the capital strategy is prudent, sustainable, affordable and prudent in the long term and provides value for money
11. Ensuring that due diligence has been carried out on all treasury and non-financial investments and is in accordance with the risk appetite of the Council
12. Ensure that the Council has appropriate legal powers to undertake expenditure on non-financial assets and their financing
13. Ensuring the proportionality of all investments so that the Council does not undertake a level of investing which exposes the Council to an excessive level of risk compared to its financial resources
14. Ensuring that an adequate governance process is in place for the approval, monitoring and ongoing risk management of all non-financial investments and long term liabilities
15. Provision to members of a schedule of all non-treasury investments including material investments in subsidiaries, joint ventures, loans and financial guarantees

16. Ensuring that members are adequately informed and understand the risk exposures taken on by the Council
17. Ensuring that the Council has adequate expertise, either in house or externally provided, to carry out the above
18. Creation of Treasury Management Practices which specifically deal with how non-treasury investments will be carried out and managed.

Third Party Loans Policy

1. Government changes in the way councils are funded has prompted local authorities to look at more innovative ways of supporting business plan objectives.
2. The primary aims of any investment, in order of priority, are the security of its capital, liquidity of its capital and to obtain a return on its capital commensurate with levels of security and liquidity. These aims are crucial in determining whether to proceed with a potential loan.
3. Whilst the Council does not wish to become a commercial lender in the market place it can use its ability to borrow, at relatively economic rates, to support the delivery of improved outcomes for the residents of Wiltshire. At the same time this will facilitate the creation of a relatively modest income stream to support the Council's overall financial resilience. All third party loans must demonstrate alignment to the Council's core objectives and priorities.
4. The intention of this policy is therefore to establish a framework within which the Council may consider advancing loans to third party organisations.

Types of Loan

Loans Defined as Capital Expenditure

5. The acquisition of share capital or loan capital in any corporate body is defined as capital expenditure under Regulation 25(1) (d) of the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003.
6. A loan, grant or financial assistance provided by this Council to another body will be treated as capital expenditure if the Council would define the other bodies use of those funds as capital had it undertaken the expenditure itself.
7. Loans of this nature will be included in the Council's approved capital programme.
8. The Council's Minimum Revenue Provision (MRP) Policy sets out the MRP requirements in respect of capital loans.

Other Loans

9. Other loans refers to loans that do not meet the definitions of capital expenditure but still support the delivery of the Council's core objectives and priorities. Examples of this type of loan include working capital loans to the Council's Local Authority Trading Companies (LATC's) and loans to Wiltshire Schools to enable Academy conversion.

Loan Framework

10. All loans, with the exception of loans to Wiltshire Schools to enable Academy conversion, must be secured against an asset or guaranteed by a public sector organisation with tax raising powers.
11. The maximum loan to value will not exceed 80%.
12. The maximum duration of the loan will be 25 years but the loan period must not exceed the useful life of the asset.
13. An independent valuation of the asset upon which the loan is secured will be undertaken by the Council.
14. A robust business case must be developed that demonstrates that the loan repayments are affordable.
15. The on-going value of the asset(s) that the loan has been secured against will be valued on a 5 year basis. A charge to revenue may be required if the equity value falls below the debt outstanding or if it becomes clear that the borrowing organisation is unable to service the debt.
16. Guarantees will be called upon if the lending organisation falls into arrears of more than 12 months.
17. Given the administrative costs incurred in both establishing and managing loans of this nature an administration/arrangement fee will be applied to each loan made. The arrangement fee will be no more than 1.0% of the value of the loan value.
18. All loan proposals (including any loan re-scheduling) must be agreed with the Director of Finance & Procurement in conjunction with the Council's Treasury Management team.

Limits

19. No specific maximum limits are proposed but all loans must be approved as set out above.
20. Loans less than £0.250 million will not be considered.

State Aid and Interest Rates

21. Under current EU law, State Aid rules must be taken into account whenever public money is given to an organisation that undertakes any commercial operation. State Aid is defined as an advantage in any form whatsoever conferred on a selective basis to undertakings by public authorities. Subsidies granted to individuals or general measures open to all enterprises are not covered by the State Aid prohibition.
22. The general parameters of the scheme will not permit loans to be made where the funding could be used in the delivery of commercial activities. However, not for profit organisations often undertake commercial activities in order to support the delivery of non-commercial activities. State aid can be avoided by using the Market Economy Operator (MEO) principles. If the state is acting in a way that a rational private investor would, for example in providing loans or capital on terms that would be acceptable to a genuine private investor who is motivated by return and not policy objectives, then it is not providing State Aid. This is because the beneficiary is not considered to be obtaining an advantage from the State but on the same terms that it could have obtained on the open market.
23. The actual interest rate charged on third party loans will be set with reference to the minimum permitted within State Aid rules at the time of fund advance and the Council's cost of borrowing plus an appropriate credit risk margin, whichever is higher.
24. If there is any doubt as to whether State Aid may be an issue, Legal advice must be sought.

Governance Arrangements

25. Loans Defined as Capital Expenditure require Cabinet approval in order to be added to the Capital Programme supported by a full business case.
26. The Director for Finance and Procurement has delegated authority for awarding loans to schools, in order to assist with their conversion process to become an academy. Specific delegation was awarded by Cabinet at their meeting of 17 May 2016, minute number 63.
27. All other loans must be approved by Cabinet supported by a full business case. Specific details in relation to drawdown of approved loan facilities must be specified as part of each business case.

28. Due-diligence checks will be undertaken to test the underlying assumptions set out in each business case. These checks will include but are not limited to independent credit checks and future cashflow forecasts.

Financial Risk

29. Where the Council issues capital loans to third parties (including to its own commercial companies), the expectation is that the funds lent will be re-paid in full at a future date.
30. However, the Council is required to consider the potential impairment of all loans that it issues to third parties on an annual basis to comply with International Financial Reporting Standards (IFRS 9). Where it is considered that there is a risk that any loan will not be re-paid, the Council will need to consider the level of any impairment, in full or in part) as appropriate. Impairments represent a real financial cost to the Council and are charged to the Council's General Fund revenue budget.

Exemptions

31. Exemptions to this policy may be considered but any exemption will need to be approved by Full Council.

This page is intentionally left blank

COUNCIL – 25 FEBRUARY 2020

BUDGET DEBATE PROCESS

1. Introduction by Chairman

- Remind councillors about circulated paperwork
- To clarify process to be followed

2. Councillor Philip Whitehead - Leader of the Council

- To deliver the budget speech
- No time limit on speech

3. Councillor Simon Jacobs - Cabinet Member for Finance & Procurement

- To present and move the budget
- No time limit on speech

4. Councillor Graham Wright - Chair of Overview and Scrutiny Management Committee

- To present the report of the Committee on the consideration of the Financial Plan – 28 January 2020
- To highlight particular areas of discussion
- No time limit on speech

5. Councillor Ian Thorn – Chair of Financial Planning Task Group

- To report on the work of the Financial Planning Task Group
- No time limit on speech

6. Group Leaders – Response to Budget

- Group Leaders to respond to the recommendations of Cabinet and Councillor Jacobs' motion
- No time limit on speeches

7. Group Leaders – Opportunity for amendments *(if applicable)*

- Group Leaders' opportunity to move amendments to the motion – each amendment needs to be seconded and the seconder may reserve their speech until later in the debate

- Debate and vote on each amendment to budget – Group Leaders to be asked to speak first on any amendments.
- Chairman of Overview and Scrutiny Committee to respond, then widen debate to other Councillors.
- Movers of an amendment have a right to reply, followed by Cllr Jacobs (as mover of original motion).

8. Other Councillors – Opportunity for amendments *(if applicable)*

- Each councillor to speak once only
- The mover of the amendment has a right to reply followed by the mover of the original motion (Councillor Jacobs) who has the right of reply
- Debate and vote on amendment
- Proceed to next amendment and repeat process

9. The Substantive Motion

(This could be the original motion or the motion as amended)

- Debate on the substantive motion
 - Councillors to speak only once
 - Cllr Jacobs has right of reply
 - Substantive motion debated and put to the vote
 - Budget set
 - All votes on budget will be by way of recorded vote
-

**EXTRACT MINUTES OF THE CABINET MEETING HELD ON 4
FEBRUARY 2020 AT COUNCIL CHAMBER - COUNTY HALL, BYTHESEA
ROAD, TROWBRIDGE, BA14 8JN.**

**Wiltshire Council's Budget 2020/21 and Medium Term Financial Strategy
2020/21 - 2024/25**

21 Cllr Simon Jacobs, Cabinet Member for Finance and Procurement introduced the report which proposed the 2020/2021 Budget and Medium-Term Financial Strategy 2020/2021 to 2024/2025 and set out the budget setting proposals, giving details that fed into the budget setting reports.

Colin Gale asked for clarification in relation to figures detailed in the report associated with Council Tax and Social Care Levy. A copy of his question is attached as an appendix to these minutes. The Leader indicated that a written response would be provided after the meeting.

Cllr Jacobs reported that the process undertaken to consult on the Budget was open and transparent. He confirmed that the report had been discussed in detail with the public, the Financial Planning Task Group and the Overview and Scrutiny Management Committee, prior to its consideration by the Cabinet and ultimately Council at the end of February 2020.

In presenting the report, Cllr Jacobs indicated that the Council's strategic aims and priorities drove the medium-term financial planning process, with changes in resource allocation determined in accordance with policies and priorities of the Council's 2017-2027 business plan. A key focus being to ensure a strong sustainable financial base during the current challenging times. The key changes reflect the revised forecast for the increasing demand for care for the vulnerable, including adult and children with complex care needs and special educational needs and the delay in Government determining a new fairer funding settlement.

Cllr Jacobs commented on (i) the Council's four key priorities; (ii) the growth and challenges to the Council spending; (iii) funding sources for the budget; (iv) the level of savings required for 2020/2021; and (v) budget assumptions for future years. He was confident that the Council was currently in a good position to set a strong Financial Plan for the years ahead and thanked officers for their assistance in putting the proposals together.

Councillor Graham Wright, Chair of the Overview and Scrutiny Management Committee, welcomed the positive and early engagement with Scrutiny and thanked officers for their input. He confirmed that the Overview and Scrutiny Management Committee undertook a robust and thorough consideration of the proposals, the details of which were circulated as a Supplement to the main agenda.

Resolved: To recommend that Council

- 1. Agrees the budget for 2020/21;**
- 2. Approves the growth and savings proposals summarised in the report to provide a net revenue budget for 2020/21 of £344.023 million;**
- 3. Agrees to:**
 - a. Set the Council's total net expenditure budget for 2020/21 at £344.023 million;**
 - b. Set a Council Tax increase of 1.99% and Social Care Levy increase of 2%;**
 - c. Delegate changes in fees and charges as set out in Section 9;**
 - d. Set a 2.7% increase for social dwelling rents (CPI plus 1%);**
 - e. Set the Housing Revenue Account (HRA) Budget for 2020/21 at £30.302 million expenditure; and**
 - f. All service charges related to the HRA being increased to recover costs, capped at increase of £5 per week for those not on housing benefits and garage rents increased by 1.7% (CPI).**
- 4. Endorse the Medium-Term Financial Strategy and receive regular updates on delivery against strategy to Cabinet; and**
- 5. Notes the budget gap of £69.527 million for MTFS period 2021/22 – 2024/25.**

Reason for Decision:

To enable the Cabinet to recommend to Council to:

- 1. Set its revenue and housing revenue accounts budgets and levels of reserves and Council Tax for the financial year 2020/21;*
- 2. Provide the Council with a strong financial plan for sustainable delivery of services in 2020/21;*

3. *Provide the Council with a Medium-Term Financial strategy to drive long term financial sustainability and delivery of the business plan; and*
4. *Meet its strategic financial objectives.*

22 **Capital Strategy**

Cllr Simon Jacobs, Cabinet Member for Finance and Procurement presented the report on the Capital Strategy for 2020/2021; the Capital Programme for 2020/2021 with future years projected to 2029/2030.

Cllr Jacobs in presenting the report explained that the purpose of the Capital Strategy is to set out the priorities and framework within which Wiltshire Council determines its resourcing priorities for capital investment, decides the level of borrowing, the affordability of the borrowing and sets the level of the risk appetite. He referred to the proposed Capital Programme which totalled £898.330m over the ten year period, and in particular those capital schemes already approved and pipeline scheme requiring approval.

Resolved: To recommend that Council

- 1. Adopts the Capital Strategy 2020/2021**
- 2. Approves the Capital Programme 2020/2021-2029/2030**
- 3. Adopts the non-financial investment indicators (paragraph 84 of the report)**

Reason for Decision:

To enable the Council to agree a Capital Strategy for 2020/2021, approve the Capital Programme 2020/2021-2029/2030 and set non-financial investment indicators that comply with statutory guidance and reflect best practice.

23 **Treasury Management Strategy**

Cllr Simon Jacobs, Cabinet Member for Finance and Procurement presented the report, which recommended that Council approve the Prudential and Treasury Indicators, together with the Treasury Management Strategy for 2020/21.

The report included information about:

- Prudential and Treasury Indicators for the next three years

- Debt management decisions required for 2020/2021 that do not feature within the Prudential or Treasury Indicators (paragraphs 72 to 76)
- Minimum Revenue Provision Policy 2020/2021
- Annual Investment Strategy for 2020/2021

In response to a comment from Cllr Ian Thorn about loans from the Public Loans Board, Cllr Jacobs confirmed that borrowing risks are analysed and monitored on a regular basis and that the interest rates charged were for the term of the loan.

In response to a question from Cllr Pauline Church about investments in environmentally responsible assets, Cllr Jacobs confirmed that the Council received specialist advice from treasury advisors for the day to day investments made with banks and other investment organisations.

Resolved: To recommend that Council

- 1. Adopts the Minimum Revenue Provision Policy (paragraph 32 – 34 of the report)**
- 2. Adopts the Prudential and Treasury Indicators (paragraphs 24 – 31, 40 – 48 and Appendix A of the report)**
- 3. Adopts the Annual Investment Strategy (paragraph 77 onwards of the report)**
- 4. Delegates to the Director of Finance and Procurement the authority to vary the amount of borrowing and other long-term liabilities within the Treasury Indicators for the Authorised Limit and the Operational Boundary**
- 5. Authorises the Director of Finance and Procurement to agree the restructuring of existing long-term loans where savings are achievable or to enhance the long-term portfolio**
- 6. Agrees that short term cash surpluses and deficits continue to be managed through temporary loans, deposits and money market funds**
- 7. Agrees that any surplus cash balances not required to cover borrowing are placed in the most appropriate specified or non-specified investments, particularly where this is more cost effective than short term deposits and delegate to the Director of Finance and Procurement the authority to select such funds**
- 8. Adopts the Third Party Loans Policy (paragraph 93 and Appendix F of the report)**

Reason for Decision:

To enable the Council to agree a Treasury Management Strategy for 2020/2021 and set Prudential Indicators that comply with statutory guidance and reflect best practice.

Questions from Colin Gale

Agenda Item 6 – Wiltshire Council’s Budget 2020/21 and Medium Term Financial Strategy 2020/21 – 2024/25

To Councillor Simon Jacobs – Cabinet Member for Finance and Procurement

Question 1

I attended the WC finance brief at Devizes on 16th January and the budget presentation identified that the total budget funding needed for 2020/21 was £332.4m. The Cabinet report identifies that this was the opening amount and the amount now needed is £344.023m?

Response

The £332.4m is the 2019/20 budget before the movements as shown below are applied to reach the 2020/21 budget of £344.0m:

MTFS Financial Model	2019-2020 Approved Financial Plan	Movement 2020-2021	2020- 2021
	£m	£m	£m
Income / Funding			
Recurring Funding			
Council Tax Requirement	(252.580)	(8.250)	(260.830)
Social Care Levy	(18.417)	(5.476)	(23.893)
Total Council Tax	(270.997)	(13.726)	(284.723)
Rates Retention	(58.500)	1.900	(56.600)
Collection Fund	(2.881)	0.181	(2.700)
Total Funding	(332.378)	(11.645)	(344.023)

Question 2

Similarly, with a council tax increase of 1.99% the Council Tax Requirement identified on 16th Jan was £252.580m. The cabinet report, Section 5, now identifies the 'Amount funded through Council Tax to be £260.830m' and yet the percentage increase has not changed. On page 46 of the report the £8.250m increase is identified as funding movement but there is no clear explanation in the report on how the funding movement is achieved. At the Devizes meeting £2.8m was identified as additional council tax from new homes but this will not in isolation explain the funding movement.

Response

The £252.580m is the 2019/20 budget before movements as shown above. The £260.830m is the 20/21 requirement. It is not simply 1.99% of the base because of the additional properties and growth in the base number of properties as well as the increased %. Thus, the breakdown of council tax growth is as follows

Overall Council Tax Base 2019/20	270.997
Base increase 1.0336%	2.801
New base 2020/21	273.798
Increase Ctax 1.99%	5.449
Increase Social Care levy 2%	5.476
Council Tax Funding 2020/21	284.723

The overall Council tax increase is the base increase of 1.036% and the Council 1.99% tax increase (2.801m + 5.449m= 8.250m)

Question 3

Again, at the Devizes meeting it was stated that there would be a 2% increase to the social care levy which would generate an additional £18.4m. The cabinet report, Section 5, identifies the amount now as £23.893m again without any percentage increase.

Response

The £18.4 m is the existing social care levy is 2019/20, to which £5.476 m growth is added to reach £23.893 m for 2020/21.

Question 4

The report, page 46, identifies a funding movement of £5.476m from the original amount but there is no clear explanation on how this is achieved. Please can you explain how these funding movements are achieved if the percentage increases stay the same?

Response

As above. The growth of 2% is on the overall council tax base of £273.798 m after including the new properties.

APPENDIX to the Overview and Scrutiny Management Minutes of 28 January 2020

Wiltshire Council

Cabinet 4 February 2020

Council 25 February 2020

Report of the Overview and Scrutiny Management Committee on the Draft Financial Plan Update 2020-21 and Medium-Term Financial Strategy 2020-2025

Purpose of report

1. To report to Cabinet and Full Council a summary of the main issues discussed at the meeting of the Overview and Scrutiny Management Committee (“The Committee”) held on 28 January 2020.

Background

2. The meeting of the Overview and Scrutiny Management Committee provides an opportunity for non-executive councillors to question the Cabinet Member with responsibility for Finance and the Chief Executives with the Interim Director of Finance on the draft 2020-21 Financial Plan and medium-term financial strategy before it is considered at Cabinet on 4 February 2020 and Full Council on 25 February 2020.
3. The Cabinet Member for Finance and Procurement, Councillor Simon Jacobs, supported by the Interim Director of Finance and Section 151 Officer, Deborah Hindson, was in attendance along with the Leader of the Council, Councillor Philip Whitehead, and the Chief Executive Officers, Alistair Cunningham and Terence Herbert, to provide clarification and answers to issues and queries raised by the Committee.
4. In addition to the draft Financial Plan update made available on the council’s website on 20 January 2020 and other public events, a briefing from the Cabinet Member open to all elected Members was held on 23 January 2020 and was attended by 44 Members.
5. Details had included:
 - Council Tax to be increased by 1.99% and a Social Care Levy of 2%;
 - Details of the £14.683m savings proposed (of which £3.849m was identified during the 2019/20 budget process, leaving £10.834m to be identified), with a total expenditure of £344.023m;
 - Increase in the level of reserves to 5% over the MTFs period;
 - A 2.7% increase for social dwelling rents
 - The Housing Revenue Account (HRA) budget for 2020/21 to be set at £30.302m expenditure and all service charges related to the HRA being increased to cover costs, capped at £5 per week for those not on housing benefits and garage rents increased by 1.7%.
 - A forecast budget gap of £69.527m for the Medium-Term Financial Strategy period 2021/22 – 2024/25

APPENDIX to the Overview and Scrutiny Management Minutes of 28 January 2020

Main issues raised during questioning and debate

6. This report is divided into sections relating to each of the Select Committee areas as budget proposals and impacts on services were discussed, before opening up to general queries.

Financial Planning Task Group

7. The report of the Task Group on the budget proposals was received and noted. The report and its comments would be forwarded for attention at Cabinet and Full Council along with the report of the Committee itself.
8. The Committee sought details of some of the points raised in the Task Group report, including the identification of risks when seeking savings, and in particular the new Savings Delivery Group, which would be reporting directly to the Corporate Leadership Team on achieving agreed savings.
9. Business transformation, in particular digitalisation, was highlighted as increasingly important to achieve savings. It was noted that the circa £69m of savings required in the next four years was less than had been achieved in the preceding 4 years, and there was discussion of how transformation of services could allow savings not previously achievable, but also that many simple efficiencies had already been achieved.

Children's Select Committee

10. Clarity was sought in relation to the Dedicated Schools Grant (DSG) where as in 2019/20 there had been an increase in demand in the High Needs Block, for this year of £4.904m. It was confirmed Schools Forum had agreed a transfer of 0.7%, £2.065m, from the Schools Block to support high needs pupils, which would require approval from the Secretary of State. the Council had requested permission to transfer up to 1% of Schools Funding (up to £2.6m) to cover the remaining shortfall for the High Needs block along with £1.300m as a one-off contribution. It was confirmed that the Department for Education had approved 0.8% to contribute to the shortfall from other blocks within DSG. It was also noted by the Committee that Wiltshire remained one of the lowest funded authorities in this area.

Additional details were also sought on future budget pressures and growth in Children's and Families, where it went from £6.596m in 2020/21 to £3.870m in 2021/22, before increasing to £5.211m by 2024/25. This was explained as 20/21 effectively having double growth reinstating some 2019/20 savings.

11. Pressures on cost of providing children's transport of £1.221m was raised, and it was stated this could decrease when arrangements for the expanded school at Rowdeford were in place.
12. The level of savings required from children and education within the bloc which included corporate services and Human Resources was also queried, as well as the £0.675m funding for the Families and Children's transformation programme.

APPENDIX to the Overview and Scrutiny Management Minutes of 28 January 2020

13. Further queries were made on Special Educational Need (SEN) funding contributions from academies, impacts on services from increases in the living wage, and that circa £4m of the overall £73m savings required in the next 4 years had already been identified, hence the overall figure of circa £69m still to identify.

Environment Select Committee

14. Details were sought in relation to waste contract delivery, as delays had resulted in significant costs in the previous financial year. In response it was stated the council was confident the new household waste and recycling collections would be operational from sometime in March 2002.
15. It was confirmed in response to queries that there were no current plans to end charging for green waste collection, and no government proposals on the subject at present.
16. It was also confirmed that free Sunday parking costs had not been included within the budget proposals.
17. Details were sought on the development of a climate change team within the proposals, and it was highlighted that the team would bring through projects like Carbon reduction funded by capital investment or savings, and that the budget cost was for staffing.
18. Other issues raised included pressures on the libraries service, and it was stated no savings were required, one off growth had been given, but there was a focus on increasing volunteering further and looking at making the service more efficient.

Health Select Committee

19. It was confirmed that the Social Care Levy was able to be included in the budget because central government had not finalised its fairer funding formula which would revise allocations for local authorities, and therefore the amount could change in future once that was resolved, and was for 2020/21 only. It was confirmed the levy was for adult social care.
20. It was stated that approximately 62p out of every pound the council spent was on Adult Social Care and Looked After Children, and as such transformation within Adult Social Care had been responsible for significant savings in previous years and would in future years. The Committee was also interested in monitoring private sector social care for any implications for the council. It also requested a breakdown of how much of the spend was statutory, and how much was discretionary, with a discussion on the preventative effect of discretionary spending.
21. It was noted that there was continued uncertainty as to proposals from central government regarding social care, and that there could be significant changes which could impact upon council proposals, positively and negatively. It was also confirmed in response to queries that the council was in frequent contact with the Clinical Commission Group to discuss operations and financial matters.

APPENDIX to the Overview and Scrutiny Management Minutes of 28 January 2020

Conclusion

22. To note the Financial Plan Update 2020-21 and Medium-Term Financial Strategy 2020-25 and to refer the comments of the Committee and the report of the Financial Planning Task Group to Cabinet and Full Council for consideration on 4 and 25 February 2020 respectively.
23. To welcome the Executive's positive engagement with the Financial Planning Task Group in the budget development and monitoring process.
24. To support the Financial Planning Task Group's continued focus on monitoring the delivery of the savings and efficiencies proposed in this Financial Plan Update (and of any further savings proposed throughout the year).

Councillor Graham Wright

Chairman of the Overview and Scrutiny Management Committee

Report Author: Kieran Elliott, Senior Democratic Services Officer, 01225 718504,
kieran.elliott@wiltshire.gov.uk

30 January 2020

Annex – Report of the Financial Planning Task Group for 28 January 2020

Wiltshire Council

Overview and Scrutiny Management Committee

28 January 2020

Report of the Financial Planning Task Group:

Wiltshire Council Financial Plan Update 2020-21 and Medium-Term Financial Strategy 2020/21-2024/25

The Task Group met with the following to discuss the reports on 23 January 2020:

Cllr Philip Whitehead	Leader of the Council
Cllr Simon Jacobs	Cabinet Member for Finance and Procurement
Alistair Cunningham	Chief Executive Officer (Place)
Terence Herbert	Chief Executive Officer (People)
Deborah Hindson	Interim Director for Finance and Section 151 Officer
Matthew Tiller	Chief Accountant
Lizzie Watkin	Head of Corporate Finance and Deputy S151 Officer

Observing:

Cllr Graham Wright	Chairman, OS Management Committee
Cllr Bob Jones MBE	Vice-chairman, Environment Select Committee
Paul Kelly	Head of Democracy

Issue (page and paragraphs numbers refer to the Budget Report)	Further information / Comments
(Para 16) Social Care Levy	It is assumed that local authorities' ability to collect the Social Care Levy (rising by 2% in 2020-21 only) will remain until Central Government provides an alternative model that makes social care funding sustainable.
(Para 28 table) Climate Change Team	This is a £350k investment to meet the staffing costs of a climate change team, remaining static in subsequent years.
(Para 28 table) External footpaths and cycle paths	The £100k budgeted is to fund staff for identifying and progressing footpaths and cycle paths so that the council can take advantage of Central Government funding expected this year.

<p>(Para 32) Savings Delivery Group</p>	<p>Once established, this will be an officer group to ensure the delivery of savings. An operational group will look at savings delivery plans while a senior board will exercise further challenge. The group will look at business plans behind proposed operational changes to ensure that they are deliverable and will monitor previous year undelivered savings and future years' savings. Delivery of headline savings will continue to be reported via the budget monitoring reports brought to Cabinet and the Task Group, with deliverability RAG-rated.</p> <p>The task group queried whether the group could also be proactive in terms of identifying additional savings opportunities.</p>
<p>(Para 42) Designated School Grant (DSG)</p>	<p>Following the Special Educational Needs (SEN) restructure in November 2019, a challenging recovery plan was approved by Schools Forum on 16 January 2020. Schools Forum also agreed a transfer of 0.7% (£2.065m) of grant from the schools block of funding to support high needs pupils. A formal disapplication request has now been submitted to the Secretary of State to permit this, with approval anticipated. Schools Forum is working with officers on a wide range of plans to reduce the commitment on the high needs block and national lobbying on funding continues.</p> <p>Paragraph 42 will be amended to reflect situation after approval by Schools Forum.</p>
<p>(Para 57) Topping up General Fund Reserves</p>	<p>It was confirmed that the recommendation to adopt General Fund Scenario 3 (representing the largest injection of cash into General Fund Reserves) represents the advice of the Section 151 officer and is intended to retain the council's reserves at the 5% of budget total (currently 4.4%). Wiltshire's reserves are low compared with most comparator authorities, but it remains policy to operate at 'minimum reserves' to maximise the funds available for investment.</p>
<p>(Para 66) Business Transformation</p>	<p>The SAP improvement programme presents enormous opportunities for broad efficiencies, to be fully implemented by 2022.</p> <p>An Head of Organisational Design and People Change has been appointed to ensure that all</p>

	<p>transformation programmes have a strong people focus in order to achieve the necessary cultural change. There may be a benefit in members becoming more aware of how the council successfully drives culture change as part of all service transformations.</p> <p>There will also be more consistent performance management with people held to account for delivery of their objectives.</p>
(Appendix A) Rates Retention	The level has reduced in 2020-21 (£56.6m) due to a technical adjustment. The council has to pay Central Government back a certain percentage if it collects more business rates than originally projected.
(Appendix B) Capital Costs	<p>A breakdown of capital cost projections is set out in paragraph 28 (table).</p> <p>The council expects to invest around £800M in capital programmes across the next 10 years.</p>
(Appendix F para 13) Government funding	An update from Central Government on the Fair Funding Review is not expected prior to the council's 2020-21 budget being adopted. However, announcements are expected later in the year. In deciding the outcomes of the review Central Government will need to consider the potential impact on high need/low rate collecting local authority areas if there was a significant shift towards greater rate retention by collecting authorities.
(Appendix F para 13-15) Business Rates Review	<p>The task group requested more detail about the potential changes to income collections and a sector by sector split of rateable values.</p> <p>There is some risk with projecting business rate receipts from the Ministry of Defence (MOD) because there can be delays to the assessments of MOD assets' rateable values due to security access requirements for assessors</p>
(Appendix F para 17) Interest	In general, Central Government wants to encourage local authorities to invest, but there is no certainty at present in terms of possible changes to local authority borrowing rates.

Police ICT	Following Wiltshire Police’s decision to withdraw from the council’s ICT system (due to national security requirements for police ICT) both parties are negotiating how the expense of the change will be shared. The change will mean a reduction of income to the council, but also a reduction in its costs.
Addressing the funding gap	<p>The 2020-21 budget presents those savings proposals that have already been submitted (by budget holders),challenged and approved. The other savings proposals submitted will continue to be assessed by the Savings Delivery Groups, with bigger savings areas considered by the relevant programme boards.</p> <p>Although it may appear to be the headline figure, the £69M budget gap over four years is significantly less than the total amount of savings achieved over the last four years and is deliverable</p>

Cllr Ian Thorn, Chairman of the Financial Planning Task Group

Report authors:

Simon Bennett, Senior Scrutiny Officer, 01225 718709,
simon.bennett@wiltshire.gov.uk

Henry Powell, Scrutiny Lead, 01225 718052, henry.powell@wiltshire.gov.uk

Wiltshire Council

Council

25 February 2020

Subject: Capital Strategy 2020/2021

Cabinet member: Councillor Simon Jacobs Cabinet Member for Finance and Procurement

Key Decision: Key

Executive Summary

This report presents the Capital Strategy for 2020/2021 as well as sets the Capital Programme for 2020/2021 with future years projected to 2029/2030.

The Capital Strategy, including the Flexible Capital Receipts Strategy is an annual requirement that must be authorised by Full Council. The report was endorsed by Cabinet at its meeting on 4 February 2020, the Cabinet report is included below

The purpose of the Capital Strategy is to clearly set out the priorities and framework within which Wiltshire Council determines its resourcing priorities for capital investment, decides the level of borrowing, the affordability of the borrowing and sets the level of the risk appetite.

Proposals

That Council:

- a) Adopts the Capital Strategy 2020/2021
- b) Approves the Capital Programme 2020/2021-2029/2030
- c) Adopts the non-financial investment indicators (paragraph 84)

Reasons for Proposals

To enable the Council to agree a Capital Strategy for 2020/2021, approve the Capital Programme 2020/2021-2029/2030 and set non-financial investment indicators that comply with statutory guidance and reflect best practice.

Alistair Cunningham
Chief Executive Officer – Place

Terence Herbert
Chief Executive Officer – People

Wiltshire Council

Cabinet

4 February 2020

Subject: Capital Strategy 2020/2021

Cabinet member: Councillor Simon Jacobs Cabinet member for Finance and Procurement

Key Decision: Key

PURPOSE OF REPORT

1. This report asks the Cabinet to consider and recommend that the Council approve the Capital Strategy for 2020/2021; the Capital Programme 2020/2021-2029/2030 and the associated non-financial investment indicators.

BACKGROUND

2. The Prudential code for Capital Finance in Local Authorities (2017) introduced a new requirement for Local Authorities to prepare an annual Capital Strategy to be authorised by Full Council.
3. The purpose of the Capital Strategy is to clearly set out the priorities and framework within which Wiltshire Council determines its resourcing priorities for capital investment, decides the level of borrowing, the affordability of the borrowing and sets the level of the risk appetite.
4. "The Capital Strategy is intended to give a high level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services along with an overview of how associated risk is managed and the implications for future sustainability." (Para 21 Prudential code)
5. The Capital Strategy does not duplicate more detailed policies, procedures or plans; it is intended to sit above and reference these to allow those seeking more detail to know where to find it.
6. This strategy also encompasses the requirements of the new legislation regarding Non-Financial Assets which are held primarily or partially to generate a profit such as investment property portfolios. These requirements are clearly set out in the statutory guidance on Local Government Investments (3rd edition).
7. Capital Expenditure is defined within the Chartered Institute of Public Finance and Accountancy's (CIPFA) Accounting Code of Practice as;

“...Expenditure that results in the acquisition, construction, or the enhancement of non-current assets (tangible or intangible) in accordance with proper practices... All other expenditure must be accounted for as revenue expenditure unless specifically directed by the Secretary of State. “

CAPITAL EXPENDITURE

Capital Programme

8. The Capital Programme is approved by Full Council annually. The proposed Capital Programme 2020/2021-2029/2030 is attached in full as Appendix A and totals £898.330 million over this 10-year period. Appendix A is the combination of:
 - Appendix B – approved capital schemes (including any budgetary/funding amendments, re-profiling and extension into future years) which totals £746.310 million
 - Appendix C – capital programme pipeline schemes (these will require approval of an appropriate business case in order to access the funding and be moved to the approved capital programme before any expenditure can be incurred) which total £152.020 million
9. The Capital Programme sets out the capital projects that the Council plans to invest in over the next 10 years from 2020/2021 to 2029/2030; the amount of budget per project per year and the indicative sources of funding.
10. The Capital Programme has been reviewed and all figures validated, amended and reprofiled in consultation with Capital Project Leads where necessary.
11. The revenue impacts (e.g. external interest payable and Minimum Revenue Provision (MRP)) of the proposed capital programme 2020/2021-2029/2030 have been factored into the 2020/2021 revenue budget setting process and MTFS (inclusive of capital programme pipeline schemes).
12. The current Flexible Use of Capital Receipts Directive allows revenue costs of transformation of services to be capitalised up until 2021/2022. A review of services currently undergoing transformation has been carried out and the forecast associated costs have been added to the Capital Programme 2020/2021-2029/2030 to be funded from flexible capital receipts as part of the council's Flexible Capital Receipts Strategy. This allows for revenue savings to be realised or non-recurring revenue growth to be avoided.
13. The key objectives of Wiltshire Council's Capital Programme are to ensure;
 - Capital assets are used to support the delivery of corporate priorities and council services (including the Housing Revenue Account (HRA)) in line with the Council's 4 key business plan priorities;
 - Expenditure is aligned to the Council's Asset Management Plan and HRA Business Plan to ensure that buildings and infrastructure, such as schools, roads

and housing dwellings are fit for purpose and in a suitable condition to deliver services to the communities they serve;

- All investments are affordable, sustainable and financially prudent;
- Expenditure supports and enhances service delivery and/or generates revenue savings or income streams.

14. In setting the Capital Programme, the Council will strongly consider projects that can generate new or additional future on-going income revenues to replace reducing grant funding and enable services that are required by the community to be provided. Opportunities will also be explored to develop new ways of relieving future pressures.
15. The Council will look to maximise opportunities to secure external funds and work with partners, both private and other government agencies, to increase the overall level of investment within Wiltshire to support priorities and economic development.
16. Capital projects within the Capital Programme are aligned to the Council's key priorities as set out in the Wiltshire Council Business Plan 2017-2027. These key priorities are:

- **Growing the Economy (£508.559 million in the period 2020/2021-2029/2030)**

We want to continue sustainable growth in our communities, and grow the skills of the local workforce so that we can continue to attract and retain high value businesses in Wiltshire. To do that we also recognise we need to have high quality schools, colleges and Higher Education provision, good transport networks and employment sites, as well as sufficient housing in clean, safe and attractive environments.

Capital projects include Chippenham Station Hub; Regeneration of the Maltings and Central Car Park, Salisbury; Council House Build Programme; Refurbishment of the Council's Housing Stock; Highways Structural Maintenance; and LED Street Lighting.

- **Stronger Communities (£132.529 million in the period 2020/2021-2029/2030)**

We want people in Wiltshire to be encouraged to take responsibility for their well-being, build positive relationships and to get involved, influence and take action on what's best for their own communities – we want residents to succeed to the best of their abilities and feel safe where they live and work.

Capital projects include Health & Wellbeing Centres; Schools Basic Need; Special Schools and Schools Maintenance & Modernisation.

- **Protecting Those Who Are Most Vulnerable (£32.287 million in the period 2020/2021-2029/2030)**

We want to build communities that enable all residents to have a good start in life, enjoying healthy and fulfilling lives through to a dignified end of life. We will provide people with the opportunities and skills to achieve this by investing in early intervention, prevention and promoting community inclusivity. Where care is

needed, health and social care will be delivered seamlessly to the highest standards. For the most vulnerable we will work closely with health and the voluntary sector to provide appropriate, local, cost efficient and good quality care packages, support and facilities.

Capital projects include Disabled Facilities Grants and Adult Care Transitions.

- **An Innovative and Effective Council (£224.955 million in the period 2020/2021-2029/2030)**

Looking ahead, we must continue to be innovative in how we work. Doing things differently means that some difficult decisions will need to be made in order that the rising demand for some services can be met. We will also focus on generating income by adopting a more commercial approach in what we do and seizing the opportunity to work with businesses for mutual benefits. By working closely with communities, businesses and public sector partners we can achieve so much more and together we can make Wiltshire an even better place in which to live, work and visit. We will continue to make Wiltshire a special place where communities are strong, more connected and able to cope with any challenges they face.

Capital projects include those that are cross-cutting; aiming to transform services or facilitating a more commercial approach such as a Housing Company; Commercial Investment; Carbon Reduction; Operational Property Energy Efficiency and Generation; and a number of ICT related schemes such as ICT Get Well and ICT Applications, which includes the replacement of the Enterprise Resource Planning (ERP) System.

17. A copy of the Capital Programme 2020/2021-2029/2030 is attached as Appendix A. The following table provides a summary of the Capital Programme:

Business Plan Priority	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	TOTAL	
	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	%
Growing the Economy	135.461	57.583	62.854	63.108	30.580	31.070	31.543	31.618	32.114	32.628	508.559	56.6
Stronger Communities	44.708	18.984	17.413	15.112	13.062	4.750	4.700	4.650	4.600	4.550	132.529	14.8
Protecting the Vulnerable	3.922	4.365	3.000	3.000	3.000	3.000	3.000	3.000	3.000	3.000	32.287	3.6
An Innovative and Effective Council	77.443	48.895	43.328	36.973	3.741	2.915	2.915	2.915	2.915	2.915	224.955	25.0
TOTAL	261.534	129.827	126.595	118.193	50.383	41.735	42.158	42.183	42.629	43.093	898.330	100.0

18. The Capital Programme for 2020/2021 proposes a total value of £261.534 million of capital works. This maintains a long-term Capital Programme of £898.330 million for the period 2020/2021 to 2029/2030.

19. Major schemes (approved and pipeline) over the period 2020/2021-2029/2030), consisting of 59% of the overall Capital Programme are as follows:

Capital Scheme	BUDGET						FUNDING					
	2020/2021	2021/2022	2022/2023	2023/2024	Future Years 2024/2025 to 2029/2030	TOTAL	Grants & Contributions	HRA	Capital Receipts	Borrowing	Borrowing	TOTAL
	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m
Regeneration of the Maltings and Central Car Park, Salisbury	36.889	0.000	0.000	0.000	0.000	36.889	0.000	0.000	0.000	31.200	5.689	36.889
Council House Build Programme (Phase 3.1/3.2)	18.718	18.754	0.000	0.000	0.000	37.472	6.235	24.267	6.970	0.000	0.000	37.472
HRA – Refurbishment of Council Stock	11.017	11.344	11.336	11.788	76.633	122.118	0.000	122.118	0.000	0.000	0.000	122.118
Commercial – Housing Company	15.000	10.000	10.000	10.000	0.000	45.000	0.000	0.000	0.000	45.000	0.000	45.000
Commercial – Commercial Investment	12.500	12.500	12.500	12.500	0.000	50.000	0.000	0.000	0.000	50.000	0.000	50.000
Structural Maintenance	13.139	13.139	13.139	13.139	78.834	131.390	131.390	0.000	0.000	0.000	0.000	131.390
Housing Infrastructure Fund (HIF)	5.000	5.000	32.500	32.500	0.000	75.000	75.000	0.000	0.000	0.000	0.000	75.000
Special Schools	1.652	7.984	8.513	7.262	7.262	32.673	0.000	0.000	0.000	0.000	32.673	32.673
TOTAL	113.915	78.721	87.988	87.189	130.568	530.542	212.625	146.385	6.970	126.200	38.362	530.542

20. Further detail on these major schemes is as follows:

Regeneration of the Maltings and Central Car Park, Salisbury

This scheme relates to acquisition and further development of The Maltings and Central Car Park in Salisbury and was approved by Cabinet in October 2019. The regeneration of the Maltings and Central Car Park site is a long-standing policy objective of the Council. It is also a priority action for the Swindon and Wiltshire Local Enterprise Partnership (SWLEP). The total budget for this scheme over the period 2020/2021-2029/2030 is £36.889 million and will be funded by external borrowing which is to be funded by revenue savings generated by the service.

Council House Build Programme (Phase 3.1/3.2)

This scheme relates to further phases of the Council House Build Programme aligned to the remodelled Housing Revenue Account (HRA) business plan 2020-2050 and was approved by Cabinet in October 2019. The total budget for this scheme over the period 2020/2021-2029/2030 is £37.472 million and will be funded

by a mixture of grants & contributions, HRA capital receipts or by the HRA, either directly or via external borrowing (funded by the HRA).

HRA - Refurbishment of Council Stock

This scheme is the cyclical repairs and maintenance on the council's housing stock e.g. bathrooms, kitchens, roofs boilers etc. The total budget for this scheme over the period 2020/2021-2029/2030 is £122.118 million in line with the HRA business plan.

Commercial - Housing Company

This scheme relates to the setting up of a local housing company (Stone Circle) within Wiltshire to meet a range of strategic housing needs facing the council that cannot easily be addressed by the Council's current approaches. Accommodation to meet the needs of specific vulnerable households in a timely manner from the existing housing stock in Wiltshire is not a priority for the Council's registered provider partners. The Council procures accommodation for homeless households that is costly and the quality and cost could be improved by private rented sector accommodation provided by a local housing company.

The Council has a successful programme of asset disposal. Over the next three years the Council estimates that it may be able to offer to the market sites capable of residential development which subject to planning permission could deliver over 500 units of accommodation. If the Council were to establish a local development company not only would it enable the strategic housing needs across the County to be better met it would also increase the potential return that could be generated from the developments.

A number of Local Authorities have established wholly owned local housing companies and development companies and there is a track record and body of professional advice to help establish such bodies.

The total budget for this scheme over the period 2020/2021-2029/2030 is £45.000 million and will be funded by external borrowing which is to be funded by revenue savings generated by the service.

The regeneration of the east wing site in Trowbridge will include residential development. To date demolition has been funded by one Public estate funding. It is intended to transfer the residential development opportunity to Stone Circle development company so as to safeguard the funding. Transfer of the opportunity will be subject to requirements of the Council's shareholders agreement with Stone Circle development company.

Commercial - Commercial Investment

This scheme relates to the investment estate within Wiltshire. This includes investment in our existing estate as well as new investment in order to maximise revenue generation. The total budget for this scheme over the period 2020/2021-2029/2030 is £50.000 million and will be funded by external borrowing which is to be funded by revenue savings generated by the service.

Structural Maintenance

This scheme includes the resurfacing of roads, reactive patching, surface dressing, drainage and pothole repairs. The total budget for this scheme over the period 2020/2021-2029/2030 is £131.390 million and is funded by external grants from Central Government.

Housing Infrastructure Fund (HIF)

This scheme relates to the delivery of significant infrastructure works, employment land and housing development in and around Chippenham. The total budget for this scheme over the period 2020/2021-2029/2030 is £75.000 million and is funded by external grants from Central Government following a successful application to Central Government's Housing Infrastructure Fund (HIF). Further details on this scheme are detailed in the Cabinet report of October 2019.

Special Schools

This scheme relates to the proposed provision in a new centre of excellence for pupils with special needs and disabilities. It will be developed at Rowdeford near Devizes to match the excellent facilities at Exeter House, Salisbury.

The purpose-built special school will address the demand needs for additional SEND places for Wiltshire while providing:

- Outstanding teaching from well-trained, well-paid, caring, specialist and dedicated staff
- Attractive buildings - safe, friendly, calm and engaging places with wide corridors and lots of natural light
- Strong links with mainstream schools, with a special outreach provision (or resource base) in at least one primary and one secondary school in each key locality
- New world class facilities and support: hydro-pools, sensory rooms, physio, open outdoor space, speech and language therapy, family care
- Strong and vibrant community links – with cafés, community gardens and public playing fields – with inclusive businesses and civic spaces and services that facilitate and advocate independent living for all
- Improved inclusion and outcomes for children with SEND at secondary age
- Effective links with specialist nurseries, offering children with special needs seamless attention from the time they are tots to their teenage years
- Good transport routes and means of transport between the sites, central to the home locations of children and young people with SEND

The total budget for this scheme over the period 2020/2021-2029/2030 is £32.673 million and is funded by external borrowing; the revenue costs associated with this external borrowing have been included in the Medium-Term Financial Strategy (MTFS).

Capital Programme - Pipeline

21. The Capital Programme is approved annually at the budget setting meeting by Full Council.
22. All amendments to the Capital Programme in year must be approved per Financial Regulations and the Scheme of Delegation and are reported to Cabinet as part of the budget monitoring reporting process.
23. Capital Pipeline Schemes (per Appendix C) have not yet been formally approved but have been included in the overall Capital Programme for financial transparency and prudence and for Council to agree the overall financial envelope.
24. Significant capital pipeline schemes in the period 2020/2021-2029/2030 include:
 - Housing Infrastructure Fund - £75.000 million (see further detail in paragraph 20)
 - Other Capital Schemes to be Confirmed - £29.934 million. This is currently unallocated capital funding to allow in-year flexibility to fund new schemes and/or pressures that arise post budget setting. This allocation has been included within the programme to ensure that the revenue costs of this capital financing (if required) are covered within the Medium Term Financial Strategy. The following schemes are expected to come forward and may draw down on this unallocated funding:
 - Drainage and Flood Alleviation programme
 - Costs associated with decanting and moving of services linked to implementation of the Depot Strategy
 - Household Recycling Centre Developments (Churchfields and Stanton St Quintin)
 - Major Roads Network
 - Leisure Transformation
25. All Capital Pipeline schemes must provide full business cases for consideration and approval including the following minimum information, in order to gain formal approval to access funding and be moved into the approved Capital Programme before any expenditure may be incurred:
 - A description of the scheme;
 - The estimated financial implications, both capital and revenue, to be signed off by Accountancy;
 - The expected outputs, outcomes and contribution to the Councils Key Priorities per the Business Plan;
 - Any urgency considerations (e.g. statutory requirements or health and safety issues).

26. Business Cases will only be considered in the following circumstances:

- To meet strategic business plan objectives
- To meet statutory obligations for e.g. new schools' places;
- To maximise use of existing assets in order to reduce revenue costs;
- To deliver long term sustainable savings;
- To meet Health and Safety requirements;
- 'Invest to save' proposals to pump prime the delivery of revenue savings;
- To create sustainable income streams – Business Rates and Council Tax;
- To earn income – Rents, Interest and Dividends;
- To address major infrastructure investment and deliver wider economic growth;
- Where new projects are funded by external sources.

27. In completing Capital Bid forms, realistic estimates of phasing of capital spend between years must be used. There should be robust evidenced estimates based on identifiable project milestones and timescales which will be subject to scrutiny. Bids must also indicate on the Capital Bid form how the project meets Council priorities.

28. During the autumn Directors and Members meet to discuss the proposals, prioritising them against the strategic aims of the Council and assessing their affordability against risks and future funds that may become available. These proposals along with the approved Capital Programme are then presented to Cabinet in February and referred to Full Council for approval; thereby setting the full capital programme for the next 10 years.

Capital Financing

29. The Capital Programme financing can be summarised as follows:

	2020/ 2021	2021/ 2022	2022/ 2023	2023/ 2024	2024 2025	2025/ 2026	2026/ 2027	2027/ 2028	2028/ 2029	2029/ 2030	TOTAL	
	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	%
Grants & Contributions	55.302	32.839	57.570	57.520	24.970	24.920	24.870	24.820	24.770	24.720	352.301	39.2
HRA	29.842	25.990	11.534	11.788	11.760	12.250	12.723	12.798	13.294	13.808	155.787	17.3
Flexible Use of Capital Receipts	5.190	3.318	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	8.508	1.0
Capital Receipts	8.612	2.180	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	10.792	1.2
Borrowing (Funded by service revenue savings)	66.048	29.774	29.950	25.900	0.000	0.000	0.000	0.000	0.000	0.000	151.672	16.9
Borrowing	96.540	35.726	27.541	22.985	13.653	4.565	4.565	4.565	4.565	4.565	219.270	24.4
TOTAL	261.534	129.827	126.595	118.193	50.383	41.735	42.158	42.183	42.629	43.093	898.330	100.0

30. The Council seeks to utilise a wide range of funding to support its Capital Programme, maximising external funding opportunities, such as grants and contributions, and limiting internal sources, such as revenue funding. Capital funding sources are described below.

31. **Grants & Contributions** - Grant funding is one of the largest sources of financing for the Capital Programme. The majority of grants are awarded by Central Government departments, but some are received from other external bodies. Grants can be specific to a scheme, have conditions attached (such as time and criteria restrictions), or are for general use. S106 deposits account for the majority of capital contribution funding; these deposits are ringfenced for particular projects as defined in the individual S106 agreements. Community Infrastructure Levy (CIL) can be used to fund capital expenditure in line with the council's CIL policy.

32. **HRA** – Capital expenditure for the Housing Revenue Account (HRA) is ringfenced from general fund capital expenditure and is financed by a combination of HRA borrowing and use of the major repairs reserve.

33. **Flexible Use of Capital Receipts** – Central Government issued a directive that allows Local Authorities further flexibility regarding the use of capital receipts from the sale of their own assets to help fund the revenue costs of transformation projects and release savings.

34. **Capital Receipts** - The income received over the value of £0.010 million from the disposal of Fixed Assets or the repayment of loans for capital purposes is defined as a capital receipt. They can normally¹ only be used to fund capital expenditure or repay debt. Some capital receipts have additional restrictions on their use. The Council seeks to obtain the highest possible receipt achievable from each disposal after considering wider community or service benefits and ring-fences receipts generated from the disposal of HRA assets to fund HRA projects.

¹ The Secretary of state can issue directives to allow exceptions to this rule such as the "Flexible use of Resources directive".

35. **Borrowing (funded by service revenue saving)** – There are a small number of schemes in the Capital Programme that are funded by borrowing where the anticipated revenue saving arising from the capital investment will be utilised to fund the costs of borrowing. These schemes, and the associated amount of borrowing to be funded from savings and income generated are (currently no schemes have been identified as being funded in this manner post 2023/2024):

Capital Schemes	2020/ 2021	2021/ 2022	2022/ 2023	2023/ 2024	TOTAL
	£m	£m	£m	£m	£m
Regeneration of the Maltings and Central Car Park, Salisbury	31.200	0.000	0.000	0.000	31.200
LED Street Lighting	6.148	3.074	0.000	0.000	9.222
Commercial – Housing Company	15.000	10.000	10.000	10.000	45.000
Commercial – Commercial Investment	12.500	12.500	12.500	12.250	50.000
Commercial – Local Development Company	0.990	4.200	7.450	3.400	16.040
Commercial - Loans	0.210	0.000	0.000	0.000	0.210
TOTAL	66.048	29.774	29.950	25.900	151.672

36. **Borrowing** - The Council can determine the level of its borrowing for capital financing purposes, based upon its own views regarding; the affordability, prudence and sustainability of that borrowing, in line with the CIPFA Prudential Code for Capital Finance. Borrowing levels for the Capital Programme are therefore constrained by this assessment and by the availability of the revenue budget to meet the cost of this borrowing which is built into the Council's Medium-Term Financial Strategy (MTFS).
37. **Revenue Funding** - The Council can use revenue resources to fund capital projects on a direct basis. However, given the pressures on the revenue budget of the Council, there are currently no plans to finance any of the current capital programme by revenue funding and it is unlikely that the Council will choose to undertake this method of funding in the future if other sources are available.

Flexible Capital Receipts Strategy

38. Qualifying expenditure is that which is:

- designed to generate ongoing revenue savings in the delivery of public services and/or transform service delivery to reduce costs and/or transform service delivery in a way that reduces costs or demand for services in future years for any of the public sector delivery partners; and
- is properly incurred by the Authorities for the financial years that begin on 1 April 2016, 1 April 2017, 1 April 2018, 1 April 2019, 1 April 2020 and 1 April 2021 (a condition of this direction that expenditure can only be funded from capital receipts which have been received in the years to which this direction applies)

39. As there is no guarantee that this directive will be extended past 2021/2022, the draft capital programme 2020/2021-2029/2030 assumes that the directive ends in 2021/2022, therefore all schemes funded by the flexible use of capital receipts must be completed or be funded from revenue by/from 2022/2023 onwards.

40. All surplus capital receipts have been earmarked to fund potential transformational projects as follows:

Capital Schemes	2020/2021			2021/2022		
	Approved	Pipeline	Total	Approved	Pipeline	Total
	£m	£m	£m	£m	£m	£m
Service Devolution & Asset Transfer	0.243	0.000	0.243	0.000	0.000	0.000
Transformation Schemes in Children's Services	0.675	0.000	0.675	0.000	0.000	0.000
Adult Care Transitions	0.054	0.000	0.054	0.000	0.000	0.000
Organisational Development & People Change	0.000	1.000	1.000	0.000	1.000	1.000
Business Intelligence	0.000	1.000	1.000	0.000	0.000	0.000
Fostering Excellence	0.000	0.868	0.868	0.000	1.365	1.365
Other Transformational Schemes (to be confirmed – including Adults Transformation)	0.000	1.350	1.350	0.000	0.953	0.953
TOTAL	0.972	4.218	5.190	0.000	3.318	3.318

41. Delivery plans for each pipeline transformational scheme will need to be agreed by the council's Corporate Leadership Team. These plans will need to include details on the expected levels of revenue savings that the scheme will generate and/or details in relation to the transformation of service delivery to reduce costs and/or

transform service delivery in a way that reduces costs or demand for services in future years for any of the public sector delivery partners

42. The Flexible Use of Capital Receipts directive requires that a progress update is reported as part of this strategy. The following table sets out the actual and estimated spend for approved schemes:

Capital Schemes	2018/2019 (Actual)	2019/2020 (Estimate)	2020/2021 (Estimate)
	£m	£m	£m
Service Devolution & Asset Transfer	0.022	0.463	0.243
Digitisation	0.133	0.000	0.000
Transformation Schemes in Children's Services	0.000	1.995	0.675
IT Applications (Adult Care Liquid Logic)	0.313	0.937	0.000
Adult Care Transitions	0.000	0.086	0.054
Adults Transformation Phase 2	0.731	0.870	0.000
Total	1.199	4.351	0.972

43. Further details on these schemes is as follows:

Service Devolution & Asset Transfer

This scheme relates to the transformation of delivery of various services from Wiltshire Council to local town and parish councils. A recurring revenue saving target of £0.400 million was approved as part of 2019/2020 budget setting. £0.110 million of this target is expected to be delivered in 2019/2020 per 2019/2020 budget monitoring reporting, with the remainder being delivered in 2020/2021.

Digitisation

This scheme related to funding of an interim Director to lead on the council's Digitisation Programme. A recurring revenue saving target of £0.300 million was approved as part of 2019/2020 budget setting. Work is ongoing to enable the delivery of this savings target.

Transformation Schemes in Children's Services

This scheme relates to a number of schemes that are transformational schemes intended to reduce costs on pressured budgets rather than to deliver recurring revenue savings.

IT Applications (Adult Care Liquid Logic)

This scheme relates to the implementation of the new Adult Care Liquid Logic system to improve the accuracy of records and improve efficiencies in respect of current processes rather than to deliver recurring revenue savings. Adult Care Liquid Logic is a sub-scheme of the IT Applications scheme.

Adult Care Transitions

This scheme relates to the transition of care in respect of children with special educational needs into adult care learning disability services with the aim of ensuring that placements are fit for purpose and cost effective rather than to deliver recurring revenue savings.

Adults Transformation Phase 2

This scheme relates to the transformation of adult social care services to meet the vision; be fit for service user purpose and to deliver the performance improvement and cost reduction required over the period 2019-2023. In House Reablement has delivered £3.776 million of resulting savings in 2019/2020.

Capitalisation

44. The Council has a set of Accounting Policies that are approved annually by the Audit Committee that set out the Council's approach to capitalisation and are based upon guidance issued by the Chartered Institute of Public Finance and Accountancy (CIPFA) and take account of local circumstances.
45. The approved Accounting Policies are published within the Statement of Accounts and include policies on all the key accounting matters that affect the figures and disclosures in the statements.
46. Expenditure on the acquisition, creation or enhancement of Property, Plant and Equipment is capitalised on an accruals basis, provided that it is probable that the future economic benefits or service potential associated with the item will flow to the Council and the cost of the item can be measured reliably. Expenditure that maintains but does not add to an asset's potential to deliver future economic benefits or service potential (i.e. repairs and maintenance) is charged as an expense when it is incurred.

Asset Management Plan

47. The council's Asset Management Plan sets out the strategic approach to managing the council's land and property assets and brings together the relevant asset management policy frameworks. These frameworks support the overall approach of managing assets by portfolio and include areas such as disposals and acquisitions, as well as active management of the council's operational, commercial, and rural stock.

48. Wiltshire Council has a strategic and commercial approach to managing assets, this will be clearly set out in the Asset Management Plan. The council shares resources with other public services and uses technology, buildings and other assets flexibly to maximise value and reduce costs.
49. We develop community campuses and hubs in towns across Wiltshire to enable public services to co-locate and improve customer service. This development programme also helps us reduce the numbers of buildings we own and their associated repair and maintenance costs.
50. As buildings are freed up we create opportunities for commercial lettings of spare space or development opportunities for jobs and homes. Any capital receipts are re-invested in improving facilities elsewhere, or used for enabling strategic land purchases for development, employment, investment or transformation.

Restrictions on Borrowing

51. In October 2018, Central Government announced a policy change of abolition of the HRA debt cap effective from 29 October 2018.

DEBT AND BORROWING AND TREASURY MANAGEMENT

Debt & Borrowing

52. The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need, known as the Capital Financing Requirement (CFR), has not been fully funded) with loan debt as cash supporting the Council's reserves, balances and cash flow have been used as a temporary measure (internal borrowing). This strategy is prudent, as investment returns are low and counterparty risk is still an issue that needs to be considered. This also drives the Council's assessment of investment in relation to the liquidity of investments.
53. The following table shows the Council's projection of external debt and internal borrowing over the next 3 years:

	2020/2021	2021/2022	2022/2023
	£m	£m	£m
CFR – General Fund	581.433	622.590	655.556
CFR – HRA	126.558	141.399	141.784
Gross Borrowing – Gen Fund	440.866	504.366	561.587
Gross Borrowing – HRA	120.694	135.535	135.920
CFR not funded by gross borrowing – General Fund	140.567	118.224	93.969
CFR not funded by gross borrowing – HRA	5.864	5.864	5.864

54. Against this background and the risks within the economic forecast, caution will be adopted with the 2020/2021 treasury operations. The Director of Finance &

Procurement will, through delegation and reporting, monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:

- a) if it was considered that there was a significant risk of a sharp fall in long and short-term rates, e.g. due to a marked increase of risks around relapse into recession or of risks of deflation, then long term borrowings will be postponed, and potential rescheduling from fixed rate funding into short term borrowing will be considered.
- b) if it was considered that there was a significant risk of a much sharper rise in long and short-term rates than that currently forecast, perhaps arising from a greater than expected increase in world economic activity or a sudden increase in inflation risks, then the portfolio position will be re-appraised with the likely action that fixed rate funding will be drawn whilst interest rates were still relatively cheap.

Minimum Revenue Provision (MRP) Policy

55. The minimum revenue provision (MRP) is the amount set aside for the repayment of the debt as a result of borrowings made to finance capital expenditure.
56. The Council sets its MRP Policy annually as part of the Treasury Management Strategy; however summarised version is set out below.
57. MRP charges should reflect the economic benefit the Council gets from using the asset to deliver services over its useful life. This ensures the Council Tax payers are being charged each year in line with asset usage and prevents current taxpayers meeting the cost of future usage or future Council Tax payers being burdened with “debt” and the costs of that debt, relating to assets that are no longer in use.
58. The Treasury Management Strategy 2020/2021 recommends that Council approve the following MRP Policy:
59. The proposed MRP policy for 2020/2021 is as follows:
 - a. In respect of the Council’s supported borrowing: MRP will be provided for in accordance with existing practice outlined in the former regulations but on a 2% straight-line basis, i.e. provision for the full repayment of debt over 50 years.
 - b. MRP for capital expenditure incurred wholly or partly by unsupported (prudential) borrowing or credit arrangements: equal Instalments to be determined by reference to the expected life of the asset. Asset life is deemed to begin once the asset becomes operational. MRP will commence from the financial year following the one in which the asset becomes operational.
 - c. MRP in respect of unsupported (prudential) borrowing: equal Instalments taken to meet expenditure, which is treated as capital expenditure by virtue of either a capitalisation direction or regulations, will be determined in accordance with the asset life method as recommended by the statutory guidance.

- d. The Council retains the right to make additional voluntary payments to reduce debt if deemed prudent.
- e. Where the Council issues capital loans to third parties (including to its own commercial companies), the expectation is that the funds lent will be re-paid in full at a future date. Therefore, no MRP will set aside in respect of these loans. MRP will however need to be applied as appropriate if it is determined at any point that any such loan will not be re-paid in full. The position of each loan will be reviewed on an annual basis by Chief Finance Officer.

Treasury Management Indicators

- 60. The following Treasury Management Indicators are set within the Treasury Management Strategy 2020/2021 which is approved by Full Council annually. Further details are included in the Treasury Management Strategy 2020/2021.

Operational Boundary

- 61. The operational boundary is the limit beyond which external debt is not normally expected to exceed.
- 62. The operational boundary is a key management tool for monitoring the Authority's expected level of borrowing. It is essential to ensure that borrowing remains within the limits set and to take appropriate action where any likely breach is anticipated. Monitoring will take place through the year and will be reported to Cabinet.
- 63. The operational boundary limits as set out in the Treasury Management Strategy 2020/2021 are as follows:

Operational Boundary	2020/2021	2021/2022	2022/2023
	£m	£m	£m
General Fund	605.014	648.173	679.137
HRA	126.558	141.399	141.784
Other Long-Term Liabilities	0.200	0.200	0.200
TOTAL	731.772	789.772	821.121

Authorised Limit for External Debt

- 64. The authorised limit is the statutory limit determined under section 3 (1) of the Local Government Act 2003, and represents a limit beyond which external debt is prohibited. It reflects the level of debt which, while not desired, could be afforded in the short term, but is not sustainable in the long term.
- 65. The authorised limit is the operational boundary, including an allowance for unplanned and irregular cash movements. This allowance is difficult to predict,

Cabinet previously approved an amended allowance of 2.5% in the Treasury Management Strategy 2012/2013 at its meeting on 15 February 2012 which has been utilised annually ever since.

66. The authorised limits set out in the Treasury Management Strategy 2020/2021 are as follows:

Authorised Limit	2020/2021	2021/2022	2022/2023
	£m	£m	£m
General Fund	620.139	664.377	696.115
HRA	126.558	141.399	141.784
Other Long-Term Liabilities	0.200	0.200	0.200
TOTAL	746.897	805.976	838.099

Decisions/Risk

67. The Treasury Management Strategy 2020/2021 (see separate report) requests approval for the following:

- The Director of Finance and Procurement has delegated authority to vary the amount of borrowing and other long term liabilities within the Treasury Indicators for the Authorised Limit and the Operational Boundary
- The Director of Finance and Procurement has authority to agree the restructuring of existing long-term loans where savings are achievable or to enhance the long term portfolio
- Short term cash surpluses and deficits continue to be managed through temporary loans, deposits and money market funds
- Any surplus cash balances not required to cover borrowing are placed in the most appropriate specified or non-specified investments, particularly where this is more cost effective than short term deposits and the Director of Finance and Procurement has the authority to select such funds

68. Prudential indicators are monitored throughout the year, particularly against the two borrowing limits (operational boundary and authorised limit. Cabinet are kept informed of any issues that arise, including any potential or actual breaches of these indicators through the Treasury Management bi annual reporting process.

Scrutiny

69. The Capital Strategy is considered by the council's Financial Planning Task Group. Regular reports on the monitoring of expenditure against the approved capital programme are taken to Cabinet throughout the year.
70. The CIPFA (Chartered Institute of Public Finance and Accountancy) Code of Practice for Treasury Management recommends that members be updated on treasury management activities regularly.

71. The Council is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals.
- a) Treasury Management Strategy Statement, including prudential and treasury indicators, which covers the following,
 - the capital plans (including prudential indicators);
 - a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
 - the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
 - an investment strategy (the parameters on how investments are to be managed).
 - b) Mid-year Treasury Management Report, which will update members with the progress of the capital position, amending prudential indicators as necessary, and whether any policies require revision.
 - c) Annual Treasury Report, which provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

COMMERCIAL ACTIVITY

Non- Financial Investments

72. The Prudential Code issued by CIPFA requires that a council should not borrow more than, or in advance of need purely to profit from the investment of the extra sums borrowed. This Statutory Guidance requires that where borrowing in advance is enacted by a council that the rationale for the decision is clearly set out to ensure that external auditors, tax payers and interested parties are able to hold the council to account for the reasons for the borrowing. This will be included in the decision-making process.
73. Non-financial investments are those that are primarily held to generate a profit. Where the council holds a non-financial investment, due consideration will be given to the asset being able to retain sufficient value to provide security of investment using the fair value model in accordance with international Accounting Standard 40: Investment Property.
74. Assets that generate revenue income solely through fees and charges for discretionary services levied under section 93 of the Local Government Act 2003 will not be classified as non-financial investments for the purposes of this strategy.
75. Where there are several different objectives, when a decision is being taken to acquire an asset and the asset is not solely held for yield, then the asset will be categorised in accordance with the type of contribution made by that asset as follows:

- Yield/Profit
- Regeneration
- Economic benefit/business rates growth
- Responding to local market failure
- Treasury management

76. Assets classified as contributing to regeneration or local economic benefit will demonstrate that the investment forms part of a project within the Local Plan.

77. In advance of entering into any such investment the council will explicitly assess the risk of any loss which will make clear:

- The assessment of the market within which it is competing
- The nature of that competition and the future expected evolution of the market
- Any barriers to entry and exit of the market and any ongoing investment requirements
- The use of external advisors, explicitly:
 - Treasury Management advisors
 - Property Investment advisors – Red Book valuation & Ancillary valuations, Income & Lease risk assessment
 - Further specialist advisors – Market and Competitor assessments, Full Structural Buildings Survey, Vendor assessment & rationale for disposal
 - Specialist advisors to support s151 assessment of the potential investment
- The management arrangements for the use of external advisors
- The credit ratings issued by the credit rating agencies where this is relevant, the frequency which these are monitored and what action is to be taken should these ratings change
- The further sources of information used to assess and monitor the risk

78. The Council will look to invest in good quality commercial properties, to add to the current investment portfolio and to seek higher yields, which can provide secure and sustainable returns in accordance with the Statutory Guidance on Local Government Investments. The Council will adopt a balanced portfolio approach to investment, management and turnover of properties in order to ensure risk is balanced across its investments. This will take into account the type of properties acquired and their location in particular.

79. As an asset class, investment property provides a better total return in terms of both rental income and capital appreciation than cash investments, whilst also maintaining a high level of security. Whilst property values can be subject to short term fluctuations, values are typically stable or rising over the medium to long term. However, it is noted that property is a longer-term investment with monies tied up in the property assets not normally accessible in the short term.

80. It should be noted that the definition of investment includes loans made by the council to any wholly-owned companies in the future or associates, to a joint venture or a third party.

81. The criteria to be applied to the purchase of any properties for investment purposes under this strategy are clearly defined and agreed. The main criteria agreed are:

Type – Properties will be acquired at prices supported by independent valuations, with the objective of developing and retaining a balanced investment portfolio;

Return - Investment properties acquired generate an initial net yield of a minimum of 2%. The net yield to be calculated taking into account all costs associated with acquisition;

Occupancy - Properties being acquired should be occupied by tenants with suitable financial covenant strength and on a lease (or equivalent) agreement with no less than three years term unexpired;

Maintenance - Properties will be maintained during the period of ownership to a standard that will maximise rental income streams and sale value at disposal; and

Location - Acquisitions are not limited to being located within the Wiltshire Council area where they are acquired, with the purpose of generating income which can be reinvested into public services. It is anticipated that in Council area purchases will form the main, initial focus of the Strategy.

82. Income generated from investment income currently represents less than 1% of the Council's gross income which supports the delivery of core services. Whilst it is intended that increased investment in this area will provide a valuable source of income, the overall investment programme will support less than 2% of the Council's gross annual expenditure.

83. The Statutory Guidance on Local Government Investments requires that a range of indicators is presented to allow members and other interested parties to understand the total exposure from borrowing and investment decisions. These will cover both the current position and the expected position assuming all planned investments for the following year are completed. The indicators do not take account of Treasury Management investments which are managed under the Treasury Management Strategy unless these are expected to be held for more than 12 months.

84. The indicators are set out in the table below:

Indicators	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025
<p>1.Gross debt (in relation to commercial investments) to Net Service Expenditure limit</p> <p>Gross debt as a percentage of net service expenditure, where net service expenditure is a proxy for the size and financial strength of a local authority.</p>	9%	15%	23%	29%	28%
<p>2.Commercial Income to Net Service Expenditure</p> <p>Dependence on non-fees and charges income to deliver core services. Fees and charges should be netted off gross service expenditure to calculate NSE.</p>	1.0%	1.0%	1.0%	1.0%	1.0%
<p>3.Investment Cover ratio limit</p> <p>The total net income from property investments, compared to the interest expense.</p>	0	3.2	2.5	1.6	1.3
<p>4.Loan to asset value ratio</p> <p>The amount of debt compared to the total investment property asset value</p>	0.6	0.7	0.8	0.8	0.8

<p>5.Target income returns (after MRP & Interest) Net revenue income compared to equity. This is a measure of achievement of the portfolio of properties.</p>	2.0%	2.0%	2.0%	2.0%	2.0%
<p>6.Income Return on other Property Fund Investments As a measure against other investments and against other council's property portfolios.</p>	3.8%	3.8%	3.8%	3.8%	3.8%
<p>7.Gross Income Net Income The income received from the investment portfolio at a gross level and net level (less interest, MRP and operational costs) over time.</p>	11.5%	6.2%	4.1%	3.2%	3.2%
<p>8.Operating costs % of Income The trend in operating costs of the non-financial investment portfolio over time, as the portfolio of non-financial investments expands</p>	10%	10%	10%	10%	10%
<p>11.5%</p>	<p>4.9%</p>	<p>2.4%</p>	<p>1.2%</p>	<p>0.6%</p>	

<p>9. Vacancy levels and Tenant exposures for non-financial investments</p> <p>Monitoring vacancy levels (voids) ensure the property portfolio is being managed (including marketing and tenant relations) to ensure the portfolio is productive as possible.</p>	5%	5%	5%	5%	5%
--	----	----	----	----	----

85. For non-financial assets, the council is required to consider security by reference to the value of the asset relative to purchase price and to set out plans to recoup the investment where realising the asset would not recoup the sums invested. In the period immediately after purchase, it is expected that the costs directly attributable to the purchase of the asset will be greater than the realisable value of the asset. In this situation, the strategy will disclose the period expected for it to take for the increase in asset values to provide security for the sums invested and the assumptions underpinning that expectation.
86. The liquidity of the non-financial investment portfolio will be considered over the repayment period of any debt taken out to acquire the assets. Further to this, to manage the risk of delivery of value over the lifetime of the assets, consideration of the trade-offs between accepting capital loss and refinancing debt incurring additional debt servicing costs where relevant.

OTHER LONG-TERM LIABILITIES

87. All long-term liabilities (amounts the Council owes or anticipates owing others due for payment in excess for 1 year) are reported on the Council's Balance Sheet and associated notes as part of the Statement Accounts which are subject to scrutiny by the Audit Committee and audit by appointed external auditors.
88. The Council's long-term liabilities predominantly consist of long term borrowing and the pension fund liability.
89. The Council's long term borrowing position is reported to Members twice a year as part of the Treasury Management Strategy reporting process.
90. The pension fund liability is updated annually as part of the Statement of Accounts per the annual report the Council receives from its pension actuary Hymans Robertson.

KNOWLEDGE AND SKILLS

91. The Capital Strategy has been developed by Officers of the Council, who have relevant knowledge and technical skills. In addition, external advice and management is employed by the Council procuring and appointing suitably qualified advisors and managers to support the development, operation and design of the programmes.

Treasury Management Consultants

92. The Council uses Link Asset Services as its external treasury management advisors.

93. The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external service providers.

94. It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed, documented, and subjected to regular review.

Other Consultants

95. In addition to Treasury Management Consultants, the Council will use external consultancy services where there is a requirement to do so. Further details on use of consultants for commercial investments are detailed in paragraph 77.

Training

96. In order to ensure that members and Statutory Officers have appropriate capacity and skills regarding their involvement in the investment decision making the following steps are required:

- Training given to Members in all aspects of the Statutory Guidance, the assessment of individual investments and risk.
- Technical training given to Statutory officers and those officers negotiating commercial deals in the technical fields of investment evaluation and requirements of the statutory guidance and prudential code.
- Briefings to members of the relevant committees in advance of any investment decision making prior to a decision being brought forward to the committee covering all aspects of the assessment as well as the strategic fit.

97. The Corporate Governance arrangements around decisions on non-financial investments will follow the rigour of our normal committee arrangements. The relevant Cabinet Members will be fully briefed in terms of the full details of the assessment including external advisor reports. Scrutiny will review all such individual decisions in advance of a Cabinet decision.

Overview and Scrutiny Engagement

98. The Financial Planning Task Group will consider this report on 23 January 2020, with any comments reported at the Cabinet meeting.

Safeguarding Implications

99. None have been identified as arising directly from this report.

Public Health Implications

100. None have been identified as arising directly from this report.

Procurement Implications

101. None have been identified as arising directly from this report. Any procurement resulting from allocating this capital through an outsourced solution will follow the Part 10 Procurement and Contract Rules.

Equalities Impact of the Proposal

102. None have been identified as arising directly from this report.

Environmental and Climate Change Considerations

103. The capital expenditure budgets approved by Cabinet in 2019/2020 in relation to Carbon Reduction and Operational Energy Efficiency and Generation are included within the Capital Programme set out in Appendix A.

Risk Assessment

104. A full risk assessment of the revenue budget, reserves which covers the affordability of the capital programme proposals is included in the revenue budget setting report.

Financial Implications

105. These have been examined and are implicit throughout the report.

106. The revenue implications (Minimum Revenue Provision and External Interest) of funding the capital programme have been estimated and have been included in the council’s 2020/2021 revenue budget setting report as well as in the Medium-Term Financial Strategy and are summarised as follows:

	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025
	£m	£m	£m	£m	£m
Revenue Cost of Capital Financing	23.148	30.427	33.989	34.958	37.281

Workforce Implications

107. Staff who are working on capital programmes will be funded from the capital programme for the duration of the programme of work and therefore will be funded temporarily. This means that there may be implications for those staff in terms of job security and continuity of employment at the end of the programme of work. However, the council has in place robust policies and procedures to support this.

Legal Implications

108. None have been identified as arising directly from this report.

Proposals

109. Cabinet is requested to recommend that Full Council:

- a) Adopts the Capital Strategy 2020/2021
- b) Approves the Capital Programme 2020/2021-2029/2030
- c) Adopts the non-financial investment indicators (paragraph 84)

Deborah Hindson
Interim Director Finance and Procurement

Alistair Cunningham
Chief Executive Officer – Place

Terence Herbert
Chief Executive Officer – People

Report Author:

Stuart Donnelly
Head of Finance (Corporate)
email: stuart.donnelly@wiltshire.gov.uk
Tel: 01225 718582

Background Papers

The following unpublished documents have been relied on in the preparation of this Report:

Treasury Management Strategy 2020/2021

Appendices

Appendix A – Capital Programme 2020/2021-2029/2030 (including Capital Programme Pipeline)

Appendix B – Capital Programme 2020/2021-2029/2030

Appendix C – Capital Programme Pipeline 2020/2021-2029/2030

Appendix A - Capital Programme 2020/2021 - 2029/2030 (including Capital Programme Pipeline)

Scheme name	Business Plan Priority	Budget										Total Financing											
		2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	Total Budget	Grants	Contributions	HRA	Capital Receipts	Borrowing - Funded be Revenue Saving in service	Borrowing	Total Funding				
Growth, Investment & Place																							
A350 West Ashton/Yarnbrook Junction Improvements	Growing the Economy	3,379,663	0	0	0	0	0	0	0	0	0	0	0	0	3,379,663	0	0	0	0	0	3,379,663	3,379,663	
Chippenham Station HUB	Growing the Economy	12,236,003	0	0	0	0	0	0	0	0	0	0	0	0	12,236,003	0	0	0	0	0	12,236,003	12,236,003	
Porton Science Park	Growing the Economy	5,000,000	0	0	0	0	0	0	0	0	0	0	0	0	5,000,000	0	0	0	0	0	5,000,000	5,000,000	
Regeneration of the Maltings and Central Car Park, Salisbury	Growing the Economy	36,889,180	0	0	0	0	0	0	0	0	0	0	0	0	36,889,180	0	0	0	0	31,200,000	5,689,180	36,889,180	
Wiltshire Ultrafast Broadband	Growing the Economy	1,129,243	318,750	0	0	0	0	0	0	0	0	0	0	0	1,447,993	1,447,993	0	0	0	0	0	1,447,993	
Boscombe Down	Growing the Economy	962,651	0	0	0	0	0	0	0	0	0	0	0	0	962,651	0	0	0	0	0	962,651	962,651	
Other Economic Development Schemes	Growing the Economy	3,000,000	0	0	0	0	0	0	0	0	0	0	0	0	3,000,000	0	0	0	3,000,000	0	3,000,000	3,000,000	
LEU Street Lighting	Growing the Economy	6,147,500	3,073,750	0	0	0	0	0	0	0	0	0	0	0	9,221,250	0	0	0	0	9,221,250	0	9,221,250	
Council House Build Programme	Growing the Economy	10,746,815	272,500	197,500	0	0	0	0	0	0	0	0	0	0	11,216,815	1,162,473	130,000	9,402,012	522,330	0	0	11,216,815	
Council House Build Programme (Phase 3, 1/3, 2)	Growing the Economy	18,717,700	18,754,300	0	0	0	0	0	0	0	0	0	0	0	37,472,000	4,270,000	1,965,000	24,267,100	6,969,900	0	0	37,472,000	
Social Care Infrastructure & Strategy	Growing the Economy	634,062	0	0	0	0	0	0	0	0	0	0	0	0	634,062	634,062	0	0	0	0	0	634,062	
HRA - Refurbishment of Council Stock	Growing the Economy	11,017,000	11,344,000	11,336,000	11,788,000	11,760,000	12,250,000	12,723,000	12,798,000	13,294,000	13,808,000	122,118,000	122,118,000	0	0	122,118,000	0	0	0	0	0	122,118,000	
Commercial - Housing Company	Innovative and Effective Council	15,000,000	10,000,000	10,000,000	10,000,000	0	0	0	0	0	0	0	0	0	45,000,000	0	0	0	0	45,000,000	0	45,000,000	
Commercial - Commercial Investment	Innovative and Effective Council	12,500,000	12,500,000	12,500,000	12,500,000	0	0	0	0	0	0	0	0	0	50,000,000	0	0	0	0	50,000,000	0	50,000,000	
Commercial - Local Development Company	Innovative and Effective Council	990,000	4,200,000	7,450,000	3,400,000	0	0	0	0	0	0	0	0	0	16,040,000	0	0	0	0	16,040,000	0	16,040,000	
Commercial - Loans	Innovative and Effective Council	210,000	0	0	0	0	0	0	0	0	0	0	0	0	210,000	0	0	0	0	210,000	0	210,000	
Disabled Facilities Grants	Protecting the Vulnerable	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	30,000,000	30,000,000	0	0	0	0	0	0	0	0	30,000,000	
Facilities Management Works	Innovative and Effective Council	2,535,000	2,285,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	20,820,000	20,820,000	0	0	0	0	0	0	20,820,000	0	20,820,000	
Depot & Office Strategy	Innovative and Effective Council	4,100,000	5,050,000	0	0	0	0	0	0	0	0	0	0	0	9,150,000	0	0	0	0	0	9,150,000	9,150,000	
Bridges	Growing the Economy	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	30,000,000	30,000,000	0	0	0	0	0	0	0	0	30,000,000	
Integrated Transport	Growing the Economy	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	21,810,000	21,810,000	0	0	0	0	0	0	0	0	21,810,000	
Structural Maintenance	Growing the Economy	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	131,390,000	131,390,000	0	0	0	0	0	0	0	0	131,390,000	
Fleet Vehicles	Innovative and Effective Council	1,250,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	5,750,000	5,750,000	0	0	0	0	0	0	0	5,750,000	5,750,000	
Waste Services	Growing the Economy	750,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	5,250,000	5,250,000	0	250,000	0	0	0	0	0	0	5,000,000	
ICT Get Well	Innovative and Effective Council	1,432,500	1,332,500	1,312,500	4,772,422	0	0	0	0	0	0	0	0	0	8,849,922	0	0	0	0	0	0	0	8,849,922
ICT Business as Usual	Innovative and Effective Council	874,835	865,555	865,555	1,635,750	0	0	0	0	0	0	0	0	0	4,241,695	0	0	0	0	0	0	0	4,241,695
ICT Applications	Innovative and Effective Council	7,321,399	3,910,801	3,396,258	74,915	0	0	0	0	0	0	0	0	0	14,703,373	0	0	0	0	0	0	0	14,703,373
ICT Other Infrastructure	Innovative and Effective Council	200,000	0	0	0	0	0	0	0	0	0	0	0	0	200,000	0	0	0	0	0	0	0	200,000
Microsoft Cloud Navigator	Innovative and Effective Council	710,000	0	0	0	0	0	0	0	0	0	0	0	0	710,000	0	0	0	0	0	0	0	710,000
Wiltshire Online	Growing the Economy	530,813	0	0	0	0	0	0	0	0	0	0	0	0	530,813	0	0	0	0	0	0	0	530,813
Housing Infrastructure Fund (HIF)	Growing the Economy	5,000,000	5,000,000	32,500,000	32,500,000	0	0	0	0	0	0	0	0	0	75,000,000	75,000,000	0	0	0	0	0	0	75,000,000
Community Projects	Stronger Communities	400,000	0	0	0	0	0	0	0	0	0	0	0	0	400,000	0	0	0	0	0	0	0	400,000
Salisbury Future High Streets	Growing the Economy	1,000,000	0	0	0	0	0	0	0	0	0	0	0	0	1,000,000	0	0	0	0	0	0	0	1,000,000
Carbon Reduction	Innovative and Effective Council	4,800,000	0	0	0	0	0	0	0	0	0	0	0	0	4,800,000	0	0	0	0	0	0	0	4,800,000
North Wiltshire Schools PFI Playing Fields	Stronger Communities	300,000	0	0	0	0	0	0	0	0	0	0	0	0	300,000	0	0	0	0	0	0	0	300,000
Capital Receipt Enhancement	Innovative and Effective Council	150,000	150,000	0	0	0	0	0	0	0	0	0	0	0	300,000	0	0	0	300,000	0	0	0	300,000
Operational Property Energy Efficiency and Generation	Innovative and Effective Council	1,800,000	1,700,000	1,700,000	0	0	0	0	0	0	0	0	0	0	5,200,000	0	0	0	0	0	0	0	5,200,000
Park & Ride Solar Panel Canopies	Innovative and Effective Council	1,200,000	1,200,000	1,100,000	0	0	0	0	0	0	0	0	0	0	3,500,000	0	0	0	0	0	0	0	3,500,000
Growth, Investment & Place Services Total		194,234,364	104,277,156	106,677,813	100,991,087	36,080,000	36,570,000	37,043,000	37,118,000	37,614,000	38,128,000	728,733,420	728,733,420	295,714,528	2,345,000	165,787,112	10,782,230	151,671,250	112,423,300	728,733,420			
Children & Education																							
Area Boards and LPSA PRG Reward Grants	Stronger Communities	800,000	800,000	800,000	800,000	800,000	800,000	800,000	800,000	800,000	800,000	8,000,000	8,000,000	0	0	0	0	0	0	0	0	8,000,000	
Health and Wellbeing Centres - Live Schemes	Stronger Communities	17,739,569	5,000,000	3,000,000	2,000,000	0	0	0	0	0	0	0	0	0	27,739,569	0	0	0	0	0	0	0	27,739,569
Fitness Equipment for Leisure Centres	Stronger Communities	250,000	250,000	250,000	250,000	250,000	250,000	250,000	250,000	250,000	250,000	2,500,000	2,500,000	0	0	0	0	0	0	0	0	2,500,000	
Access and Inclusion	Stronger Communities	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	1,000,000	1,000,000	0	0	0	0	0	0	0	0	0	1,000,000
Basic Need	Stronger Communities	18,980,934	400,000	400,000	400,000	400,000	400,000	400,000	400,000	400,000	400,000	400,000	400,000	0	19,880,934	0	0	0	0	0	0	0	19,880,934
Devolved Formula Capital	Stronger Communities	800,000	550,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	5,150,000	5,150,000	0	0	0	0	0	0	0	0	0	5,150,000
New Schools	Stronger Communities	34,490	0	0	0	0	0	0	0	0	0	0	0	0	34,490	34,490	0	0	0	0	0	0	34,490
Schools Maintenance & Modernisation	Stronger Communities	4,230,226	2,900,000	2,850,000	2,800,000	2,750,000	2,700,000	2,650,000	2,600,000	2,550,000	2,500,000	28,530,226	28,530,226	0	0	0	0	0	0	0	0	0	28,530,226
Special Schools	Stronger Communities	1,652,000	7,984,000	8,513,000	7,262,000	7,262,000	0	0	0	0	0	0	0	0	32,673,000	0	0	0	0	0	0	0	32,673,000
Early Years & Childcare	Stronger Communities	330,272	0	0	0	0	0	0	0	0	0	0	0	0	330,272	271,816	58,456	0	0	0	0	0	330,272
SEND Capital	Stronger Communities	515,328	0	0	0	0	0	0	0	0	0	0	0	0	515,328	515,328	0	0	0	0	0	0	515,328
Schools Capital Maintenance	Stronger Communities	1,000,000	1,000,000	1,000,000																			

Appendix A - Capital Programme 2020/2021 - 2029/2030 (including Capital Programme Pipeline)

Scheme name	Business Plan Priority	Budget										Total Financing							
		2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	Total Budget	Grants	Contributions	HRA	Capital Receipts	Borrowing - Funded be Revenue Saving in service	Borrowing	Total Funding
Organisational Development & People Change	Innovative and Effective Council	1,000,000	1,000,000	0	0	0	0	0	0	0	0	2,000,000	0	0	0	0	0	0	
Business Intelligence	Innovative and Effective Council	1,000,000	0	0	0	0	0	0	0	0	0	1,000,000	0	0	0	0	0	0	
Fostering Excellence	Protecting the Vulnerable	868,000	1,365,000	0	0	0	0	0	0	0	0	2,233,000	0	0	0	0	0	0	
Other Transformational Schemes (to be confirmed - including Adults Transformation)	Innovative and Effective Council	1,350,713	953,010	0	0	0	0	0	0	0	0	2,303,723	0	0	0	0	0	0	
Transformational Schemes Total		5,190,413	3,318,010	0	0	0	0	0	0	0	0	8,508,423	0	0	0	0	0	0	
Capital Programme Total		261,533,596	129,827,166	126,594,813	118,193,087	50,383,000	41,735,000	42,158,000	42,183,000	42,629,000	43,093,000	898,329,662	349,897,322	2,403,456	155,787,112	10,792,230	151,671,250	219,269,869	898,329,662

Appendix B - Capital Programme 2020/2021 - 2029/2030

Scheme name	Business Plan Priority	Budget										Total Financing											
		2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	Total Budget	Grants	Contributions	HRA	Capital Receipts	Borrowing - Funded by Revenue Saving in service	Borrowing	Total Funding				
Growth, Investment & Place																							
A350 West Ashton/Yanbrook Junction Improvements	Growing the Economy	3,379,663	0	0	0	0	0	0	0	0	0	0	0	0	3,379,663	0	0	0	0	0	3,379,663	3,379,663	
Chippenham Station HUB	Growing the Economy	12,236,003	0	0	0	0	0	0	0	0	0	0	0	0	12,236,003	0	0	0	0	0	12,236,003	12,236,003	
Regeneration of the Maltings and Central Car Park, Salisbury	Growing the Economy	36,889,180	0	0	0	0	0	0	0	0	0	0	0	0	36,889,180	0	0	0	0	31,200,000	5,689,180	36,889,180	
Wiltshire Ultrafast Broadband	Growing the Economy	1,129,243	318,750	0	0	0	0	0	0	0	0	0	0	0	1,447,993	1,447,993	0	0	0	0	0	1,447,993	
Boscombe Down	Growing the Economy	962,651	0	0	0	0	0	0	0	0	0	0	0	0	962,651	0	0	0	0	0	962,651	962,651	
LED Street Lighting	Growing the Economy	8,147,500	3,073,750	0	0	0	0	0	0	0	0	0	0	0	9,221,250	0	0	0	0	9,221,250	0	9,221,250	
Council House Build Programme	Growing the Economy	10,746,815	272,500	197,500	0	0	0	0	0	0	0	0	0	0	11,216,815	1,162,473	130,000	9,402,012	522,330	0	0	11,216,815	
Council House Build Programme (Phase 3.1/3.2)	Growing the Economy	18,717,700	18,754,300	0	0	0	0	0	0	0	0	0	0	0	37,472,000	4,270,000	1,965,000	24,267,100	6,969,900	0	0	37,472,000	
Social Care Infrastructure & Strategy	Growing the Economy	634,062	0	0	0	0	0	0	0	0	0	0	0	0	634,062	634,062	0	0	0	0	0	0	634,062
HRA - Refurbishment of Council Stock	Growing the Economy	11,017,000	11,344,000	11,336,000	11,788,000	11,760,000	12,250,000	12,723,000	12,798,000	13,294,000	13,808,000	122,118,000	0	0	122,118,000	0	0	122,118,000	0	0	0	122,118,000	
Commercial - Housing Company	Innovative and Effective Council	15,000,000	10,000,000	10,000,000	10,000,000	0	0	0	0	0	0	0	0	0	45,000,000	0	0	0	0	45,000,000	0	45,000,000	
Commercial - Commercial Investment	Innovative and Effective Council	12,500,000	12,500,000	12,500,000	12,500,000	0	0	0	0	0	0	0	0	0	50,000,000	0	0	0	0	50,000,000	0	50,000,000	
Commercial - Local Development Company	Innovative and Effective Council	11,650,000	400,000	0	0	0	0	0	0	0	0	0	0	0	12,050,000	0	0	0	0	12,050,000	0	12,050,000	
Commercial - Loans	Innovative and Effective Council	210,000	0	0	0	0	0	0	0	0	0	0	0	0	210,000	0	0	0	0	210,000	0	210,000	
Disabled Facilities Grants	Protecting the Vulnerable	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	30,000,000	30,000,000	0	0	0	0	0	0	0	0	30,000,000	
Facilities Management Works	Innovative and Effective Council	2,535,000	2,285,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	20,820,000	0	0	0	0	0	0	0	20,820,000	0	20,820,000	
Depot & Office Strategy	Innovative and Effective Council	3,600,000	2,050,000	0	0	0	0	0	0	0	0	0	0	0	5,650,000	0	0	0	0	0	5,650,000	5,650,000	
Bridges	Growing the Economy	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	3,000,000	30,000,000	30,000,000	0	0	0	0	0	0	0	0	30,000,000	
Integrated Transport	Growing the Economy	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	2,181,000	21,810,000	21,810,000	0	0	0	0	0	0	0	0	21,810,000	
Structural Maintenance	Growing the Economy	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	13,139,000	131,390,000	131,390,000	0	0	0	0	0	0	0	0	0	131,390,000
Waste Services	Growing the Economy	750,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	5,250,000	0	250,000	0	0	0	0	0	0	5,000,000	5,250,000	
ICT Get Well	Innovative and Effective Council	1,432,500	1,332,500	1,312,500	4,772,422	0	0	0	0	0	0	0	0	0	8,849,922	0	0	0	0	0	8,849,922	8,849,922	
ICT Business as Usual	Innovative and Effective Council	865,555	865,555	865,555	1,635,750	0	0	0	0	0	0	0	0	0	4,232,415	0	0	0	0	0	4,232,415	4,232,415	
ICT Applications	Innovative and Effective Council	7,321,399	3,910,801	3,396,258	74,915	0	0	0	0	0	0	0	0	0	14,703,373	0	0	0	0	0	14,703,373	14,703,373	
ICT Other Infrastructure	Innovative and Effective Council	200,000	0	0	0	0	0	0	0	0	0	0	0	0	200,000	0	0	0	0	0	200,000	200,000	
Microsoft Cloud Navigator	Innovative and Effective Council	710,000	0	0	0	0	0	0	0	0	0	0	0	0	710,000	0	0	0	0	0	710,000	710,000	
Wiltshire Online	Growing the Economy	530,813	0	0	0	0	0	0	0	0	0	0	0	0	530,813	0	0	0	0	0	530,813	530,813	
Community Projects	Stronger Communities	400,000	0	0	0	0	0	0	0	0	0	0	0	0	400,000	0	0	0	0	0	400,000	400,000	
Carbon Reduction	Innovative and Effective Council	4,800,000	0	0	0	0	0	0	0	0	0	0	0	0	4,800,000	0	0	0	0	0	4,800,000	4,800,000	
North Wiltshire Schools PFI Playing Fields	Stronger Communities	300,000	0	0	0	0	0	0	0	0	0	0	0	0	300,000	0	0	0	0	0	300,000	300,000	
Operational Property Energy Efficiency and Generation	Innovative and Effective Council	1,800,000	1,700,000	1,700,000	0	0	0	0	0	0	0	0	0	0	5,200,000	0	0	0	0	0	5,200,000	5,200,000	
Growth, Investment & Place Services Total		187,785,064	90,627,156	65,127,813	64,591,087	35,580,000	36,070,000	36,543,000	36,618,000	37,114,000	37,628,000	627,684,140	220,714,628	2,345,000	155,787,112	7,492,230	147,681,250	93,664,020	627,684,140				
Children & Education																							
Area Boards and LPSA PRG Reward Grants	Stronger Communities	800,000	800,000	800,000	800,000	800,000	800,000	800,000	800,000	800,000	800,000	8,000,000	0	0	0	0	0	0	8,000,000	8,000,000			
Health and Wellbeing Centres - Live Schemes	Stronger Communities	17,739,569	0	3,000,000	2,000,000	0	0	0	0	0	0	0	0	0	22,739,569	0	0	0	0	22,739,569	22,739,569		
Basic Need	Stronger Communities	16,080,934	400,000	400,000	400,000	400,000	400,000	400,000	400,000	400,000	400,000	4,000,000	19,680,934	0	0	0	0	0	0	19,680,934			
Devolved Formula Capital	Stronger Communities	600,000	550,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	5,150,000	5,150,000	0	0	0	0	0	0	5,150,000			
New Schools	Stronger Communities	34,490	0	0	0	0	0	0	0	0	0	0	0	0	34,490	0	0	0	0	0	34,490		
Schools Maintenance & Modernisation	Stronger Communities	4,230,226	2,900,000	2,850,000	2,800,000	2,750,000	2,700,000	2,650,000	2,600,000	2,550,000	2,500,000	28,530,226	28,530,226	0	0	0	0	0	0	0	28,530,226		
Special Schools	Stronger Communities	1,652,000	7,984,000	8,513,000	7,262,000	7,262,000	0	0	0	0	0	0	0	0	32,673,000	0	0	0	0	0	32,673,000		
Early Years & Childcare	Stronger Communities	330,272	0	0	0	0	0	0	0	0	0	0	0	0	330,272	271,816	58,456	0	0	0	330,272		
SEND Capital	Stronger Communities	515,328	0	0	0	0	0	0	0	0	0	0	0	0	515,328	515,328	0	0	0	0	515,328		
Children & Education Services Total		41,982,819	12,634,000	16,063,000	13,762,000	11,712,000	4,400,000	4,350,000	4,300,000	4,250,000	4,200,000	117,653,819	54,182,794	58,456	0	0	0	0	63,412,569	117,653,819			
Transformational Schemes																							
Service Devolution & Asset Transfer	Innovative and Effective Council	242,700	0	0	0	0	0	0	0	0	0	0	0	0	242,700	0	0	0	0	0	242,700		
Transformational Schemes in Children's Services	Stronger Communities	675,000	0	0	0	0	0	0	0	0	0	0	0	0	675,000	0	0	0	0	0	675,000		
Adult Care Transitions	Protecting the Vulnerable	54,000	0	0	0	0	0	0	0	0	0	0	0	0	54,000	0	0	0	0	0	54,000		
Transformational Schemes Total		971,700	0	0	0	0	0	0	0	0	0	0	0	0	971,700	0	0	0	0	0	971,700		
Capital Programme Total		230,739,603	103,261,156	81,190,813	78,353,087	47,292,000	40,470,000	40,893,000	40,918,000	41,364,000	41,828,000	746,309,659	274,897,322	2,403,456	155,787,112	7,492,230	147,681,250	157,076,589	746,309,659				

This page is intentionally left blank

Appendix C - Capital Programme Pipeline 2020/2021 - 2029/2030

Scheme name	Business Plan Priority	Budget										Total Budget	Total Financing						Total Funding
		2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030		Grants	Contributions	HRA	Capital Receipts	Borrowing - Funded by Revenue Saving in service	Borrowing	
Growth, Investment & Place																			
Porton Science Park	Growing the Economy	5,000,000	0	0	0	0	0	0	0	0	0	5,000,000	0	0	0	0	0	5,000,000	5,000,000
Other Economic Development Schemes	Growing the Economy	3,000,000	0	0	0	0	0	0	0	0	0	3,000,000	0	0	0	3,000,000	0	0	3,000,000
Commercial - Local Development Company	Innovative and Effective Council	-10,660,000	3,800,000	7,450,000	3,400,000	0	0	0	0	0	0	3,990,000	0	0	0	0	3,990,000	0	3,990,000
Depot & Office Strategy	Innovative and Effective Council	500,000	3,000,000	0	0	0	0	0	0	0	0	3,500,000	0	0	0	0	0	3,500,000	3,500,000
Fleet Vehicles	Innovative and Effective Council	1,250,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	500,000	5,750,000	0	0	0	0	0	5,750,000	5,750,000
ICT Business as Usual	Innovative and Effective Council	9,280	0	0	0	0	0	0	0	0	0	9,280	0	0	0	0	0	9,280	9,280
Housing Infrastructure Fund (HIF)	Growing the Economy	5,000,000	5,000,000	32,500,000	32,500,000	0	0	0	0	0	0	75,000,000	75,000,000	0	0	0	0	0	75,000,000
Salisbury Future High Streets	Growing the Economy	1,000,000	0	0	0	0	0	0	0	0	0	1,000,000	0	0	0	0	0	1,000,000	1,000,000
Capital Receipt Enhancement	Innovative and Effective Council	150,000	150,000	0	0	0	0	0	0	0	0	300,000	0	0	0	300,000	0	0	300,000
Park & Ride Solar Panel Canopies	Innovative and Effective Council	1,200,000	1,200,000	1,100,000	0	0	0	0	0	0	0	3,500,000	0	0	0	0	0	3,500,000	3,500,000
Growth, Investment & Place Services Total		6,449,280	13,650,000	41,550,000	36,400,000	500,000	500,000	500,000	500,000	500,000	500,000	101,049,280	75,000,000	0	0	3,300,000	3,990,000	18,759,280	101,049,280
Children & Education																			
Health and Wellbeing Centres - Live Schemes	Stronger Communities	0	5,000,000	0	0	0	0	0	0	0	0	5,000,000	0	0	0	0	0	5,000,000	5,000,000
Fitness Equipment for Leisure Centres	Stronger Communities	250,000	250,000	250,000	250,000	250,000	250,000	250,000	250,000	250,000	250,000	2,500,000	0	0	0	0	0	2,500,000	2,500,000
Access & Inclusion	Stronger Communities	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	100,000	1,000,000	0	0	0	0	0	1,000,000	1,000,000
Schools Capital Maintenance	Stronger Communities	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	0	0	0	0	0	5,000,000	0	0	0	0	0	5,000,000	5,000,000
Children & Education Services Total		1,350,000	6,350,000	1,350,000	1,350,000	1,350,000	350,000	350,000	350,000	350,000	350,000	13,500,000	0	0	0	0	0	13,500,000	13,500,000
Corporate																			
Other Capital Schemes to be confirmed	Innovative and Effective Council	18,776,000	3,248,000	2,504,000	2,090,000	1,241,000	415,000	415,000	415,000	415,000	415,000	29,934,000	0	0	0	0	0	29,934,000	29,934,000
Corporate Services Total		18,776,000	3,248,000	2,504,000	2,090,000	1,241,000	415,000	415,000	415,000	415,000	415,000	29,934,000	0	0	0	0	0	29,934,000	29,934,000
Transformational Schemes																			
Organisational Development & People Change	Innovative and Effective Council	1,000,000	1,000,000	0	0	0	0	0	0	0	0	2,000,000	0	0	0	0	0	0	2,000,000
Business Intelligence	Innovative and Effective Council	1,000,000	0	0	0	0	0	0	0	0	0	1,000,000	0	0	0	0	0	0	1,000,000
Fostering Excellence	Protecting the Vulnerable	868,000	1,365,000	0	0	0	0	0	0	0	0	2,233,000	0	0	0	0	0	0	2,233,000
Other Transformational Schemes (to be confirmed - including Adults Transformation)	Innovative and Effective Council	1,350,713	953,010	0	0	0	0	0	0	0	0	2,303,723	0	0	0	0	0	0	2,303,723
Transformational Schemes Total		4,218,713	3,318,010	0	0	0	0	0	0	0	0	7,536,723	0	0	0	0	0	0	7,536,723
Capital Programme Pipeline Total		30,793,993	26,566,010	45,404,000	39,840,000	3,091,000	1,265,000	1,265,000	1,265,000	1,265,000	1,265,000	152,020,003	75,000,000	0	0	3,300,000	3,990,000	62,193,280	152,020,003

This page is intentionally left blank

Wiltshire Council

Council

25 February 2020

Subject: Council Tax Setting 2020/2021

Cabinet member: Councillor Simon Jacobs Cabinet Member for Finance and Procurement

Key Decision: Key

Executive Summary

This report sets out, in the complex format prescribed by law, the resolutions required from the Council to set the Council Tax for the year 2020/2021.

Using the tax base, approved by Cabinet on 10 December 2019 of 187,935.69 band D equivalent households, and the draft net budget requirement of £344.023 million (which in order to fund requires a council tax requirement of £284.723 million) gives a band D council tax, inclusive of the 2% Adult Social Care Levy for 2020/2021 of £1,515.00.

Fire, Police and Town/Parish precepts are in addition to the Wiltshire Council basic Council Tax.

The main body of the report sets out the statutory calculations, and shows the Fire, Police and Town/Parish precepts for every parish in the Wiltshire Council Tax Area along with the total Council Tax figures.

Proposal

That the Council approves the resolutions as set out within the report.

Reason for Proposal

To meet the statutory requirement to set the Council Tax. The calculations are as defined by law, and the figures will change only if the budget proposal is amended.

Alistair Cunningham OBE
Chief Executive Officer – Place

Terence Herbert
Chief Executive Officer - People

Wiltshire Council

Council

25 February 2020

Subject: Council Tax Setting 2020/2021

Cabinet member: Councillor Simon Jacobs Cabinet Member for Finance and Procurement

Key Decision: Key

Purpose of Report

1. The purpose of this report is to enable the Council to calculate and approve the Council Tax requirement for 2020/2021.

Background

2. The Localism Act 2011 requires the billing authority to calculate the council tax requirement for the year.
3. Cabinet approved the 2020/2021 Wiltshire Council tax base of 187,935.69 on 10 December 2019. The minutes of the meeting are available [here](#).

Wiltshire Council

4. The 2020/2021 Local Government Finance Settlement set out central government's decision in respect of the core principle and package of flexibilities in respect of Council Tax for 2020/2021. The principles and flexibilities that apply to Wiltshire Council are:
 - (a) Unitary authorities may increase the basic element (core principle) of the council tax by up to 2.00% without triggering a local referendum.
 - (b) Local authorities with the responsibility for adult social care have an additional flexibility on their council tax referendum threshold to be used entirely for adult social care. These local authorities will be able to increase the adult social care precept by a further 2% on top of the basic element (core principle).
5. At the Cabinet meeting on 4 February 2020 it was recommended that Wiltshire Council increase its basic element of the band D Council Tax by 1.99% for 2020/2021 (2.99% for 2019/2020).
6. It was also recommended at the same meeting that Wiltshire Council take up the additional 2.00% flexibility in respect of adult social care for 2020/2021.

7. The total recommended increase to the average band D Council Tax for 2020/2021 is therefore 3.99% (2.99% for 2019/2020). This results in an average band D Council Tax of £1,515.00 for 2020/2021 (£1,456.87 for 2019/2020).
8. Since the Cabinet meeting on 4 February 2020, the precept levels of other precepting authorities have been received. These are detailed below:

Town & Parish Councils

9. The 2020/2021 Local Government Finance Settlement confirmed that no referendum principles would apply for Town & Parish Councils for 2020/2021.
10. The Town & Parish Council Precepts for 2020/2021 are detailed in Appendix B and total £23,899,895.13. The increase in the average band D Council Tax for Town & Parish Councils is 9% and results in an average band D Council Tax figure of £127.17 for 2020/2021 (£116.67 for 2019/2020).

Office of the Police & Crime Commissioner for Wiltshire & Swindon

11. The Office of the Police & Crime Commissioner for Wiltshire & Swindon met on 6 February 2020 and set their precept in respect of the Wiltshire area at £40,644,852 exclusive of a Council Tax Collection Fund contribution of £154,286.00. This results in a band D Council Tax of £216.27 for 2020/2021. This represents an increase of £10.00 (4.85%) compared to £206.27 for 2019/2020.

Dorset & Wiltshire Fire and Rescue Authority

12. The 2020/2021 Local Government Finance Settlement confirmed that Fire & Rescue Authorities may increase the basic element of the council tax by up to 2.00% without triggering a local referendum.
13. Dorset & Wiltshire Fire and Rescue Authority met on 12 February 2020 and set their precept in respect of the Wiltshire area at £42,752,676.50 exclusive of a Council Tax Collection Fund contribution of £176,235.00 This results in a band D Council Tax of £76.36 for 2020/2021. This represents an increase of £1.49 (1.99%) compared to £74.87 for 2019/2020.

Conclusions

14. The recommendations are set out in the formal Council Tax Resolution in Appendix A.

15. The Wiltshire Council element of the Council Tax is recommended to be increased as follows:

	2019/2020 %	2020/2021 %
Wiltshire Council (Basic Amount)	2.99	1.99
Wiltshire Council (Adult Social Care)	0.00	2.00
Total	2.99	3.99

16. If the formal Council Tax Resolution in Appendix A is approved, the total band D Council Tax will be as follows:

	2019/2020 £	2020/2021 £	Increase £	Increase
Wiltshire Council	1,456.87	1,515.00	58.13	3.99%
Office of the Police & Crime Commissioner for Wiltshire & Swindon	206.27	216.27	10.00	4.85%
Dorset & Wiltshire Fire and Rescue Authority	74.87	76.36	1.49	1.99%
Sub – Total	1,738.01	1,807.63	69.62	4.01%
Town & Parish Council (average)	116.67	127.17	10.50	9%
Total	1,854.68	1,934.80	80.12	4.32%

17. The Adult Social Care Precept will account for £131.76 of the 2020/2021 Wiltshire Council Band D figure above (£102.61 for 2019/2020).

18. These increases do not require a referendum.

Risks Assessment

19. A full risk assessment of the budget proposals has been provided to Cabinet on 4 February 2020 in Wiltshire Council's Financial Plan Update 2020/2021.

Equality and Diversity Impacts of the Proposal

20. None have been identified as directly arising from this report, although equality and diversity impacts have been considered by officers and portfolio holders when preparing budget proposals.

Financial Implications

21. The financial implications are outlined in the report.

Workforce Implications

22. None have been identified as arising directly from this report.

Legal Implications

23. The legal implications are outlined in the report.

Public Health Implications

24. None have been identified as arising directly from this report.

Environmental Implications

25. None have been identified as arising directly from this report.

Safeguarding Implications

26. None have been identified as arising directly from this report.

Options Considered

27. The calculations are as defined by law, and the figures will change only if the budget proposal is amended.

Reasons for Proposals

28. To meet the statutory requirement to set the Council Tax. The calculations are as defined by law, and the figures will change only if the budget proposal is amended.

Proposal

29. That the Council approves the resolutions as set out within the report.

Deborah Hindson

Interim Director Finance and Procurement

Alistair Cunningham OBE
Chief Executive Officer – Place

Terence Herbert
Chief Executive Officer – People

Report Author:

Stuart Donnelly
Head of Finance (Corporate)
email: stuart.donnelly@wiltshire.gov.uk

Tel: 01225 71858

Background Papers

The following published documents set out the statutory requirements and powers relevant to the subject of this report:

Local Government Finance Act 1992

Localism Act 2011

Local Government Finance Settlement 2020 to 2021: technical consultation

Local Government Finance Settlement 2020 to 2021: response

The following published documents have been referred to during the preparation of this report:

Wiltshire Council's Financial Plan Update 2020/2021

Council Tax Base 2020/2021 Cabinet Report 10 December 2019

Appendices:

Appendix A Wiltshire Council - Council Tax Resolution 2020/2021

Appendix B Wiltshire Council - Council Tax Banding Schedule by Authority 2020/2021

Appendix C Wiltshire Council - Town & Parish Precepts 2020/2021

The Council is recommended to resolve as follows:

1. It be noted that on 10 December 2019 the Council calculated:
 - (a) the Council Tax Base 2020/2021 for the whole Wiltshire Council area as 187,935.69 [Item T in the formula in Section 31B(3) of the Local Government Finance Act 1992, as amended (the "Act")] and,
 - (b) for dwellings in those parts of its area to which a Parish precept relates as in the attached Appendix.
2. Calculate that the Council Tax requirement for the Council's own purposes for 2020/2021 (excluding parish precepts) is £284,722,570.
3. That the following amounts be calculated for the year 2020/2021 in accordance with Sections 31 to 36 of the Act:
 - (a) 872,749,230 **(Gross Revenue Expenditure including transfers to reserves, parish precepts and any collection fund deficit)** being the aggregate of the amounts which the Council estimates for the items set out in Section 31A(2) of the Act taking into account all precepts issued to it by Parish Councils).
 - (b) 564,126,764 **(Gross Revenue Income including transfers from reserves, General Government Grants and any collection fund surplus)** being the aggregate of the amounts which the Council estimates for the items set out in Section 31A(3) of the Act.
 - (c) £308,622,465 **(Net Revenue Expenditure including parish precepts)** being the amount by which the aggregate at 3(a) above exceeds the aggregate at 3(b) above, calculated by the Council in accordance with Section 31A(4) of the Act as its Council Tax requirement for the year. (Item R in the formula in Section 31A(4) of the Act).
 - (d) £1642.17 **(Wiltshire Council band D tax plus average Town & Parish Councils Band D Council Tax)** being the amount at 3(c) above (Item R), all divided by Item T (2 above), calculated by the Council, in accordance with Section 31B(1) of the Act, as the basic amount of its Council Tax for the year (including Parish precepts), as shown below:

Band A £	Band B £	Band C £	Band D £	Band E £	Band F £	Band G £	Band H £
1,094.78	1,277.24	1,459.71	1,642.17	2,007.10	2,372.02	2,736.95	3,282.34

- (e) £23,899,895.13 **(Aggregate of Town & Parish Council Precepts)** being the aggregate amount of all special items (Parish Precepts) referred to in Section 34(1) of the Act (as per the attached Appendix C).
- (f) £1,515.00 **(band D Council Tax for Wiltshire Council purposes only)** being the amount at 3(d) above less the result given by dividing the amount at 3(e) above by Item T (2 above), calculated by the Council, in accordance with Section 34(2) of the Act, as the basic amount of its Council Tax for the year for dwellings in those parts of its area to which no Parish precept relates, as shown below:

Band A £	Band B £	Band C £	Band D £	Band E £	Band F £	Band G £	Band H £
1,010.00	1,178.33	1,346.67	1,515.00	1,851.67	2,188.33	2,525.00	3,030.00

Wiltshire Council - Council Tax Banding Schedule by Authority 2020/2021

Council Tax Schedule 2020/2021	Band A (£)	Band B (£)	Band C (£)	Band D (£)	Band E (£)	Band F (£)	Band G (£)	Band H (£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,010.00	1,178.33	1,346.67	1,515.00	1,851.67	2,188.33	2,525.00	3,030.00
Office of the Police & Crime Commissioner for Wiltshire & Swindon	144.18	168.21	192.24	216.27	264.33	312.39	360.45	432.54
Dorset & Wiltshire Fire and Rescue Authority	50.91	59.39	67.88	76.36	93.33	110.30	127.27	152.72
Town & Parish Council (Average)	84.78	98.91	113.04	127.17	155.43	183.69	211.95	254.34
Total	1,289.87	1,504.84	1,719.83	1,934.80	2,364.76	2,794.71	3,224.67	3,869.60

Council Tax Charge by band per Parish/Town Council								
Aldbourn Parish Council	29.91	34.90	39.88	44.87	54.84	64.81	74.78	89.74
Aldbury Parish Council	34.31	40.02	45.74	51.46	62.90	74.33	85.77	102.92
All Cannings Parish Council	39.33	45.88	52.44	58.99	72.10	85.21	98.32	117.98
Allington Parish Council	32.13	37.49	42.84	48.20	58.91	69.62	80.33	96.40
Alton Parish Council	29.63	34.56	39.50	44.44	54.32	64.19	74.07	88.88
Alvediston Parish Meeting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Amesbury Town Council	77.51	90.43	103.35	116.27	142.11	167.95	193.78	232.54
Ansty Parish Council	18.26	21.30	24.35	27.39	33.48	39.56	45.65	54.78
Ashton Keynes Parish Council	34.38	40.11	45.84	51.57	63.03	74.49	85.95	103.14
Atworth Parish Council	38.51	44.93	51.35	57.77	70.61	83.45	96.28	115.54
Avebury Parish Council	42.45	49.53	56.60	63.68	77.83	91.98	106.13	127.36
Barford St Martin Parish Council	30.13	35.16	40.18	45.20	55.24	65.29	75.33	90.40
Baydon Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Beechingstoke Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Berwick Bassett & W/Bourne Monkton Parish Council	32.51	37.93	43.35	48.77	59.61	70.45	81.28	97.54
Berwick St James Parish Council	16.54	19.30	22.05	24.81	30.32	35.84	41.35	49.62
Berwick St John Parish Council	36.58	42.68	48.77	54.87	67.06	79.26	91.45	109.74
Berwick St Leonard Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Biddestone Parish Council	23.61	27.55	31.48	35.42	43.29	51.16	59.03	70.84
Bishops Cannings Parish Council	30.69	35.80	40.92	46.03	56.26	66.49	76.72	92.06
Bishopstone Parish Council	23.14	27.00	30.85	34.71	42.42	50.14	57.85	69.42
Bishopstrow Parish Council	13.00	15.17	17.33	19.50	23.83	28.17	32.50	39.00
Bowerchalke Parish Council	19.85	23.16	26.47	29.78	36.40	43.02	49.63	59.56
Box Parish Council	59.03	68.87	78.71	88.55	108.23	127.91	147.58	177.10
Boyton Parish Council	10.94	12.76	14.59	16.41	20.06	23.70	27.35	32.82
Bradford On Avon Town Council	144.60	168.70	192.80	216.90	265.10	313.30	361.50	433.80
Bratton Parish Council	49.75	58.04	66.33	74.62	91.20	107.78	124.37	149.24
Braydon Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bremhill Parish Council	13.03	15.21	17.38	19.55	23.89	28.24	32.58	39.10
Brinkworth Parish Council	27.40	31.97	36.53	41.10	50.23	59.37	68.50	82.20
Britford Parish Council	13.46	15.70	17.95	20.19	24.68	29.16	33.65	40.38
Broad Hinton & W/Bourne Bassett Parish Council	11.26	13.14	15.01	16.89	20.64	24.40	28.15	33.78
Broad Town Parish Council	23.90	27.88	31.87	35.85	43.82	51.78	59.75	71.70
Broadchalke Parish Council	17.54	20.46	23.39	26.31	32.16	38.00	43.85	52.62
Brokenborough Parish Council	10.63	12.41	14.18	15.95	19.49	23.04	26.58	31.90
Bromham Parish Council	34.83	40.63	46.44	52.24	63.85	75.46	87.07	104.48
Broughton Gifford Parish Council	26.40	30.80	35.20	39.60	48.40	57.20	66.00	79.20
Bulford Parish Council	26.79	31.25	35.72	40.18	49.11	58.04	66.97	80.36
Bulkington Parish Council	31.37	36.60	41.83	47.06	57.52	67.98	78.43	94.12
Burbage Parish Council	25.87	30.19	34.50	38.81	47.43	56.06	64.68	77.62
Burcombe Parish Council	32.02	37.36	42.69	48.03	58.70	69.38	80.05	96.06
Buttermere Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Calne Town Council+G2	143.71	167.67	191.62	215.57	263.47	311.38	359.28	431.14
Calne Without Parish Council	13.84	16.15	18.45	20.76	25.37	29.99	34.60	41.52
Castle Combe Parish Council	21.97	25.63	29.29	32.95	40.27	47.59	54.92	65.90
Chapmanslade Parish Council	12.15	14.18	16.20	18.23	22.28	26.33	30.38	36.46
Charlton Parish Council	27.56	32.15	36.75	41.34	50.53	59.71	68.90	82.68

Wiltshire Council - Council Tax Banding Schedule by Authority 2020/2021

Council Tax Schedule 2020/2021	Band A (£)	Band B (£)	Band C (£)	Band D (£)	Band E (£)	Band F (£)	Band G (£)	Band H (£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,010.00	1,178.33	1,346.67	1,515.00	1,851.67	2,188.33	2,525.00	3,030.00
Office of the Police & Crime Commissioner for Wiltshire & Swindon	144.18	168.21	192.24	216.27	264.33	312.39	360.45	432.54
Dorset & Wiltshire Fire and Rescue Authority	50.91	59.39	67.88	76.36	93.33	110.30	127.27	152.72
Town & Parish Council (Average)	84.78	98.91	113.04	127.17	155.43	183.69	211.95	254.34
Total	1,289.87	1,504.84	1,719.83	1,934.80	2,364.76	2,794.71	3,224.67	3,869.60

Council Tax Charge by band per Parish/Town Council								
Charlton St Peter & Wilsford Parish Council	11.55	13.48	15.40	17.33	21.18	25.03	28.88	34.66
Cherhill Parish Council	20.71	24.16	27.61	31.06	37.96	44.86	51.77	62.12
Cheverell Magna (Great Cheverell) Parish Council	27.42	31.99	36.56	41.13	50.27	59.41	68.55	82.26
Chicklade Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Chilmark Parish Council	23.29	27.18	31.06	34.94	42.70	50.47	58.23	69.88
Chilton Foliat Parish Council	25.34	29.56	33.79	38.01	46.46	54.90	63.35	76.02
Chippenham Town Council	174.70	203.82	232.93	262.05	320.28	378.52	436.75	524.10
Chippenham Without Parish Council	72.45	84.53	96.60	108.68	132.83	156.98	181.13	217.36
Chirton Parish Council	45.90	53.55	61.20	68.85	84.15	99.45	114.75	137.70
Chitterne Parish Council	47.18	55.04	62.91	70.77	86.50	102.22	117.95	141.54
Cholderton Parish Council	34.67	40.44	46.22	52.00	63.56	75.11	86.67	104.00
Christian Malford Parish Council	44.26	51.64	59.01	66.39	81.14	95.90	110.65	132.78
Chute Forest Parish Council	35.08	40.93	46.77	52.62	64.31	76.01	87.70	105.24
Chute Parish Council	33.77	39.40	45.03	50.66	61.92	73.18	84.43	101.32
Clarendon Park Parish Council	7.69	8.98	10.26	11.54	14.10	16.67	19.23	23.08
Clyffe Pypard Parish Council	13.05	15.22	17.40	19.57	23.92	28.27	32.62	39.14
Codford Parish Council	29.59	34.53	39.46	44.39	54.25	64.12	73.98	88.78
Colerne Parish Council	42.11	49.13	56.15	63.17	77.21	91.25	105.28	126.34
Collingbourne Ducis Parish Council	39.18	45.71	52.24	58.77	71.83	84.89	97.95	117.54
Collingbourne Kingston Parish Council	42.36	49.42	56.48	63.54	77.66	91.78	105.90	127.08
Compton Bassett Parish Council	29.82	34.79	39.76	44.73	54.67	64.61	74.55	89.46
Compton Chamberlayne Parish Council	31.09	36.28	41.46	46.64	57.00	67.37	77.73	93.28
Coombe Bissett Parish Council	19.88	23.19	26.51	29.82	36.45	43.07	49.70	59.64
Corsham Town Council	132.73	154.85	176.97	199.09	243.33	287.57	331.82	398.18
Corsley Parish Council	17.45	20.36	23.27	26.18	32.00	37.82	43.63	52.36
Coulston Parish Council	28.32	33.04	37.76	42.48	51.92	61.36	70.80	84.96
Cricklade Town Council	135.86	158.50	181.15	203.79	249.08	294.36	339.65	407.58
Crudwell Parish Council	19.86	23.17	26.48	29.79	36.41	43.03	49.65	59.58
Dauntsey Parish Council	46.35	54.07	61.80	69.52	84.97	100.42	115.87	139.04
Devizes Town Council	117.41	136.97	156.54	176.11	215.25	254.38	293.52	352.22
Dilton Marsh Parish Council	28.79	33.58	38.38	43.18	52.78	62.37	71.97	86.36
Dinton Parish Council	29.91	34.90	39.88	44.87	54.84	64.81	74.78	89.74
Donhead St Andrew Parish Council	31.84	37.15	42.45	47.76	58.37	68.99	79.60	95.52
Donhead St Mary Parish Council	22.01	25.68	29.35	33.02	40.36	47.70	55.03	66.04
Downton Parish Council	54.77	63.90	73.03	82.16	100.42	118.68	136.93	164.32
Durnford Parish Council	11.65	13.60	15.54	17.48	21.36	25.25	29.13	34.96
Durrington Town Council	46.94	54.76	62.59	70.41	86.06	101.70	117.35	140.82
East Kennett Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
East Knoyle Parish Council	19.69	22.98	26.26	29.54	36.10	42.67	49.23	59.08
Easterton Parish Council	45.03	52.54	60.04	67.55	82.56	97.57	112.58	135.10
Easton Grey Parish Council	3.04	3.55	4.05	4.56	5.57	6.59	7.60	9.12
Easton Royal Parish Council	30.97	36.13	41.29	46.45	56.77	67.09	77.42	92.90
Ebbesbourne Wake Parish Council	22.07	25.75	29.43	33.11	40.47	47.83	55.18	66.22
Edington Parish Council	26.23	30.61	34.98	39.35	48.09	56.84	65.58	78.70
Enford Parish Council	42.25	49.29	56.33	63.37	77.45	91.53	105.62	126.74
Erlestoke Parish Council	47.93	55.92	63.91	71.90	87.88	103.86	119.83	143.80
Etchilhampton Parish Council	34.58	40.34	46.11	51.87	63.40	74.92	86.45	103.74

Wiltshire Council - Council Tax Banding Schedule by Authority 2020/2021

Council Tax Schedule 2020/2021	Band A (£)	Band B (£)	Band C (£)	Band D (£)	Band E (£)	Band F (£)	Band G (£)	Band H (£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,010.00	1,178.33	1,346.67	1,515.00	1,851.67	2,188.33	2,525.00	3,030.00
Office of the Police & Crime Commissioner for Wiltshire & Swindon	144.18	168.21	192.24	216.27	264.33	312.39	360.45	432.54
Dorset & Wiltshire Fire and Rescue Authority	50.91	59.39	67.88	76.36	93.33	110.30	127.27	152.72
Town & Parish Council (Average)	84.78	98.91	113.04	127.17	155.43	183.69	211.95	254.34
Total	1,289.87	1,504.84	1,719.83	1,934.80	2,364.76	2,794.71	3,224.67	3,869.60

Council Tax Charge by band per Parish/Town Council								
Everleigh Parish Council	26.57	30.99	35.42	39.85	48.71	57.56	66.42	79.70
Figheldean Parish Council	55.97	65.30	74.63	83.96	102.62	121.28	139.93	167.92
Firsdown Parish Council	43.69	50.97	58.25	65.53	80.09	94.65	109.22	131.06
Fittleton Parish Council	37.85	44.15	50.46	56.77	69.39	82.00	94.62	113.54
Fonthill Bishop Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fonthill Gifford Parish Council	25.25	29.45	33.66	37.87	46.29	54.70	63.12	75.74
Fovant Parish Council	24.25	28.30	32.34	36.38	44.46	52.55	60.63	72.76
Froxfield Parish Council	33.35	38.91	44.47	50.03	61.15	72.27	83.38	100.06
Fyfield & West Overton Parish Council	31.70	36.98	42.27	47.55	58.12	68.68	79.25	95.10
Grafton Parish Council	17.57	20.50	23.43	26.36	32.22	38.08	43.93	52.72
Great Bedwyn Parish Council	23.17	27.03	30.89	34.75	42.47	50.19	57.92	69.50
Great Hinton Parish Council	19.65	22.93	26.20	29.48	36.03	42.58	49.13	58.96
Great Somerford Parish Council	19.16	22.35	25.55	28.74	35.13	41.51	47.90	57.48
Great Wishford Parish Council	21.25	24.79	28.33	31.87	38.95	46.03	53.12	63.74
Grimstead Parish Council	23.67	27.61	31.56	35.50	43.39	51.28	59.17	71.00
Grittleton Parish Council	9.23	10.77	12.31	13.85	16.93	20.01	23.08	27.70
Ham Parish Council	9.11	10.63	12.15	13.67	16.71	19.75	22.78	27.34
Hankerton Parish Council	20.48	23.89	27.31	30.72	37.55	44.37	51.20	61.44
Heddington Parish Council	18.61	21.71	24.81	27.91	34.11	40.31	46.52	55.82
Heytesbury & Knook Parish Council	28.20	32.90	37.60	42.30	51.70	61.10	70.50	84.60
Heywood Parish Council	12.63	14.73	16.84	18.94	23.15	27.36	31.57	37.88
Hilmarton Parish Council	17.20	20.07	22.93	25.80	31.53	37.27	43.00	51.60
Hilperton Parish Council	9.52	11.11	12.69	14.28	17.45	20.63	23.80	28.56
Hindon Parish Council	39.58	46.18	52.77	59.37	72.56	85.76	98.95	118.74
Holt Parish Council	29.85	34.82	39.80	44.77	54.72	64.67	74.62	89.54
Horningsham Parish Council	61.53	71.78	82.04	92.29	112.80	133.31	153.82	184.58
Hullavington Parish Council	30.99	36.16	41.32	46.49	56.82	67.15	77.48	92.98
Idmiston Parish Council	36.86	43.00	49.15	55.29	67.58	79.86	92.15	110.58
Keevil Parish Council	21.51	25.10	28.68	32.27	39.44	46.61	53.78	64.54
Kilminster Parish Council	34.34	40.06	45.79	51.51	62.96	74.40	85.85	103.02
Kington Langley Parish Council	37.79	44.08	50.38	56.68	69.28	81.87	94.47	113.36
Kington St Michael Parish Council	63.22	73.76	84.29	94.83	115.90	136.98	158.05	189.66
Lacock Parish Council	27.17	31.69	36.22	40.75	49.81	58.86	67.92	81.50
Landford Parish Council	35.27	41.14	47.02	52.90	64.66	76.41	88.17	105.80
Langley Burrell Parish Council	50.00	58.33	66.67	75.00	91.67	108.33	125.00	150.00
Latton Parish Council	31.54	36.80	42.05	47.31	57.82	68.34	78.85	94.62
Laverstock & Ford Parish Council	32.81	38.27	43.74	49.21	60.15	71.08	82.02	98.42
Lea & Cleverton Parish Council	20.51	23.92	27.34	30.76	37.60	44.43	51.27	61.52
Leigh Parish Council	18.67	21.79	24.90	28.01	34.23	40.46	46.68	56.02
Limpley Stoke Parish Council	47.47	55.38	63.29	71.20	87.02	102.84	118.67	142.40
Little Bedwyn Parish Council	15.49	18.07	20.65	23.23	28.39	33.55	38.72	46.46
Little Cheverell Parish Council	20.06	23.40	26.75	30.09	36.78	43.46	50.15	60.18
Little Somerford Parish Council	34.07	39.75	45.43	51.11	62.47	73.83	85.18	102.22
Longbridge Deverill Parish Council	13.01	15.18	17.35	19.52	23.86	28.20	32.53	39.04
Luckington Parish Council	20.97	24.46	27.96	31.45	38.44	45.43	52.42	62.90
Ludgershall Town Council	77.59	90.53	103.46	116.39	142.25	168.12	193.98	232.78
Lydiard Millicent Parish Council	46.69	54.48	62.26	70.04	85.60	101.17	116.73	140.08

Wiltshire Council - Council Tax Banding Schedule by Authority 2020/2021

Council Tax Schedule 2020/2021	Band A (£)	Band B (£)	Band C (£)	Band D (£)	Band E (£)	Band F (£)	Band G (£)	Band H (£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,010.00	1,178.33	1,346.67	1,515.00	1,851.67	2,188.33	2,525.00	3,030.00
Office of the Police & Crime Commissioner for Wiltshire & Swindon	144.18	168.21	192.24	216.27	264.33	312.39	360.45	432.54
Dorset & Wiltshire Fire and Rescue Authority	50.91	59.39	67.88	76.36	93.33	110.30	127.27	152.72
Town & Parish Council (Average)	84.78	98.91	113.04	127.17	155.43	183.69	211.95	254.34
Total	1,289.87	1,504.84	1,719.83	1,934.80	2,364.76	2,794.71	3,224.67	3,869.60

Council Tax Charge by band per Parish/Town Council								
Lydiard Tregoze Parish Council	25.89	30.21	34.52	38.84	47.47	56.10	64.73	77.68
Lyneham & Bradenstoke Parish Council	20.59	24.02	27.45	30.88	37.74	44.60	51.47	61.76
Maiden Bradley Parish Council	118.07	137.74	157.42	177.10	216.46	255.81	295.17	354.20
Malmesbury Town Council	140.42	163.82	187.23	210.63	257.44	304.24	351.05	421.26
Manningford Parish Council	23.57	27.50	31.43	35.36	43.22	51.08	58.93	70.72
Marden Parish Council	22.85	26.65	30.46	34.27	41.89	49.50	57.12	68.54
Market Lavington Parish Council	55.74	65.03	74.32	83.61	102.19	120.77	139.35	167.22
Marlborough Town Council	137.58	160.51	183.44	206.37	252.23	298.09	343.95	412.74
Marston Meysey Parish Council	28.44	33.18	37.92	42.66	52.14	61.62	71.10	85.32
Marston Parish Council	18.49	21.58	24.66	27.74	33.90	40.07	46.23	55.48
Melksham Town Council	106.97	124.79	142.62	160.45	196.11	231.76	267.42	320.90
Melksham Without Parish Council	53.55	62.48	71.40	80.33	98.18	116.03	133.88	160.66
Mere Parish Council	88.45	103.20	117.94	132.68	162.16	191.65	221.13	265.36
Mildenhall Parish Council	60.95	71.10	81.26	91.42	111.74	132.05	152.37	182.84
Milston Parish Council	10.85	12.66	14.47	16.28	19.90	23.52	27.13	32.56
Milton Lilbourne Parish Council	33.73	39.36	44.98	50.60	61.84	73.09	84.33	101.20
Minety Parish Council	17.09	19.93	22.78	25.63	31.33	37.02	42.72	51.26
Monkton Farleigh Parish Council	23.91	27.90	31.88	35.87	43.84	51.81	59.78	71.74
Netheravon Parish Council	48.22	56.26	64.29	72.33	88.40	104.48	120.55	144.66
Netherhampton Parish Council	26.69	31.13	35.58	40.03	48.93	57.82	66.72	80.06
Nettleton Parish Council	11.41	13.31	15.21	17.11	20.91	24.71	28.52	34.22
Newton Toney Parish Council	56.18	65.54	74.91	84.27	103.00	121.72	140.45	168.54
North Bradley Parish Council	14.69	17.13	19.58	22.03	26.93	31.82	36.72	44.06
North Newton Parish Council	55.41	64.65	73.88	83.12	101.59	120.06	138.53	166.24
North Wraxall Parish Council	28.45	33.19	37.93	42.67	52.15	61.63	71.12	85.34
Norton & Foxley Parish Meeting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Norton Bavant Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Oaksey Parish Council	49.60	57.87	66.13	74.40	90.93	107.47	124.00	148.80
Odstock Parish Council	39.30	45.85	52.40	58.95	72.05	85.15	98.25	117.90
Ogbourne St Andrew Parish Council	13.33	15.56	17.78	20.00	24.44	28.89	33.33	40.00
Ogbourne St George Parish Council	38.41	44.81	51.21	57.61	70.41	83.21	96.02	115.22
Orcheston Parish Council	13.67	15.95	18.23	20.51	25.07	29.63	34.18	41.02
Patney Parish Council	9.85	11.50	13.14	14.78	18.06	21.35	24.63	29.56
Pewsey Parish Council	54.48	63.56	72.64	81.72	99.88	118.04	136.20	163.44
Pitton & Farley Parish Council	22.72	26.51	30.29	34.08	41.65	49.23	56.80	68.16
Potterne Parish Council	28.89	33.71	38.52	43.34	52.97	62.60	72.23	86.68
Poulshot Parish Council	52.42	61.16	69.89	78.63	96.10	113.58	131.05	157.26
Preshute Parish Council	31.65	36.93	42.20	47.48	58.03	68.58	79.13	94.96
Purton Parish Council	84.01	98.02	112.02	126.02	154.02	182.03	210.03	252.04
Quidhampton Parish Council	49.32	57.54	65.76	73.98	90.42	106.86	123.30	147.96
Ramsbury Parish Council	38.60	45.03	51.47	57.90	70.77	83.63	96.50	115.80
Redlynch Parish Council	25.64	29.91	34.19	38.46	47.01	55.55	64.10	76.92
Rowde Parish Council	51.29	59.83	68.38	76.93	94.03	111.12	128.22	153.86

Wiltshire Council - Council Tax Banding Schedule by Authority 2020/2021

Council Tax Schedule 2020/2021	Band A (£)	Band B (£)	Band C (£)	Band D (£)	Band E (£)	Band F (£)	Band G (£)	Band H (£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,010.00	1,178.33	1,346.67	1,515.00	1,851.67	2,188.33	2,525.00	3,030.00
Office of the Police & Crime Commissioner for Wiltshire & Swindon	144.18	168.21	192.24	216.27	264.33	312.39	360.45	432.54
Dorset & Wiltshire Fire and Rescue Authority	50.91	59.39	67.88	76.36	93.33	110.30	127.27	152.72
Town & Parish Council (Average)	84.78	98.91	113.04	127.17	155.43	183.69	211.95	254.34
Total	1,289.87	1,504.84	1,719.83	1,934.80	2,364.76	2,794.71	3,224.67	3,869.60

Council Tax Charge by band per Parish/Town Council								
Royal Wootton Bassett Town Council	139.87	163.19	186.50	209.81	256.43	303.06	349.68	419.62
Rushall Parish Council	58.36	68.09	77.81	87.54	106.99	126.45	145.90	175.08
Salisbury City Council	138.67	161.78	184.89	208.00	254.22	300.44	346.67	416.00
Savernake Parish Council	6.28	7.33	8.37	9.42	11.51	13.61	15.70	18.84
Seagry Parish Council	66.73	77.85	88.97	100.09	122.33	144.57	166.82	200.18
Sedgehill & Semley Parish Council	26.89	31.38	35.86	40.34	49.30	58.27	67.23	80.68
Seend Parish Council	25.56	29.82	34.08	38.34	46.86	55.38	63.90	76.68
Semington Parish Council	23.15	27.00	30.86	34.72	42.44	50.15	57.87	69.44
Shalbourne Parish Council	18.17	21.20	24.23	27.26	33.32	39.38	45.43	54.52
Sherrington Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sherston Parish Council	38.63	45.07	51.51	57.95	70.83	83.71	96.58	115.90
Shrewton Parish Council	8.55	9.97	11.40	12.82	15.67	18.52	21.37	25.64
Sopworth Parish Council	4.87	5.69	6.50	7.31	8.93	10.56	12.18	14.62
South Newton Parish Council	18.77	21.90	25.03	28.16	34.42	40.68	46.93	56.32
South Wraxall Parish Council	12.32	14.37	16.43	18.48	22.59	26.69	30.80	36.96
Southwick Parish Council	19.37	22.59	25.82	29.05	35.51	41.96	48.42	58.10
St Paul Without	11.42	13.32	15.23	17.13	20.94	24.74	28.55	34.26
Stanton St Bernard Parish Council	30.27	35.31	40.36	45.40	55.49	65.58	75.67	90.80
Stanton St Quintin Parish Council	20.23	23.61	26.98	30.35	37.09	43.84	50.58	60.70
Stapleford Parish Council	27.64	32.25	36.85	41.46	50.67	59.89	69.10	82.92
Staverton Parish Council	25.14	29.33	33.52	37.71	46.09	54.47	62.85	75.42
Steeple Ashton Parish Council	34.71	40.49	46.28	52.06	63.63	75.20	86.77	104.12
Steeple Langford Parish Council	13.57	15.83	18.09	20.35	24.87	29.39	33.92	40.70
Stert Parish Council	13.23	15.43	17.64	19.84	24.25	28.66	33.07	39.68
Stockton Parish Council	3.81	4.44	5.08	5.71	6.98	8.25	9.52	11.42
Stourton Parish Council	17.41	20.31	23.21	26.11	31.91	37.71	43.52	52.22
Stratford Tony Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sutton Benger Parish Council	23.64	27.58	31.52	35.46	43.34	51.22	59.10	70.92
Sutton Mandeville Parish Council	8.18	9.54	10.91	12.27	15.00	17.72	20.45	24.54
Sutton Veny Parish Council	26.44	30.85	35.25	39.66	48.47	57.29	66.10	79.32
Swallowcliffe Parish Council	29.05	33.89	38.73	43.57	53.25	62.93	72.62	87.14
Teffont Parish Council	33.12	38.64	44.16	49.68	60.72	71.76	82.80	99.36
Tidcombe & Fosbury Parish Council	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tidworth Town Council	103.97	121.30	138.63	155.96	190.62	225.28	259.93	311.92
Tilshead Parish Council	35.85	41.83	47.80	53.78	65.73	77.68	89.63	107.56
Tisbury Parish Council	74.05	86.39	98.73	111.07	135.75	160.43	185.12	222.14
Tockenham Parish Council	38.94	45.43	51.92	58.41	71.39	84.37	97.35	116.82
Tollard Royal Parish Council	49.28	57.49	65.71	73.92	90.35	106.77	123.20	147.84
Trowbridge Town Council	109.99	128.32	146.65	164.98	201.64	238.30	274.97	329.96
Upavon Parish Council	44.95	52.44	59.93	67.42	82.40	97.38	112.37	134.84
Upper Deverills Parish Council	32.41	37.81	43.21	48.61	59.41	70.21	81.02	97.22
Upton Lovell Parish Council	23.17	27.04	30.90	34.76	42.48	50.21	57.93	69.52
Upton Scudamore Parish Council	16.99	19.82	22.65	25.48	31.14	36.80	42.47	50.96
Urchfont Parish Council	62.25	72.63	83.00	93.38	114.13	134.88	155.63	186.76
Warminster Town Council	127.83	149.14	170.44	191.75	234.36	276.97	319.58	383.50
West Ashton Parish Council	21.87	25.52	29.16	32.81	40.10	47.39	54.68	65.62
West Dean Parish Council	69.50	81.08	92.67	104.25	127.42	150.58	173.75	208.50

Wiltshire Council - Council Tax Banding Schedule by Authority 2020/2021

Council Tax Schedule 2020/2021	Band A (£)	Band B (£)	Band C (£)	Band D (£)	Band E (£)	Band F (£)	Band G (£)	Band H (£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,010.00	1,178.33	1,346.67	1,515.00	1,851.67	2,188.33	2,525.00	3,030.00
Office of the Police & Crime Commissioner for Wiltshire & Swindon	144.18	168.21	192.24	216.27	264.33	312.39	360.45	432.54
Dorset & Wiltshire Fire and Rescue Authority	50.91	59.39	67.88	76.36	93.33	110.30	127.27	152.72
Town & Parish Council (Average)	84.78	98.91	113.04	127.17	155.43	183.69	211.95	254.34
Total	1,289.87	1,504.84	1,719.83	1,934.80	2,364.76	2,794.71	3,224.67	3,869.60

Council Tax Charge by band per Parish/Town Council								
West Knoyle Parish Council	44.27	51.64	59.02	66.40	81.16	95.91	110.67	132.80
West Lavington Parish Council	44.53	51.96	59.38	66.80	81.64	96.49	111.33	133.60
West Tisbury Parish Council	23.99	27.98	31.98	35.98	43.98	51.97	59.97	71.96
Westbury Town Council	114.97	134.13	153.29	172.45	210.77	249.09	287.42	344.90
Westwood Parish Council	44.75	52.21	59.67	67.13	82.05	96.97	111.88	134.26
Whiteparish Parish Council	47.00	54.83	62.67	70.50	86.17	101.83	117.50	141.00
Wilcot & Huish Parish Council	21.07	24.59	28.10	31.61	38.63	45.66	52.68	63.22
Wilsford-cum-Lake Parish Council	5.36	6.25	7.15	8.04	9.83	11.61	13.40	16.08
Wilton Town Council	100.35	117.08	133.80	150.53	183.98	217.43	250.88	301.06
Wingfield Parish Council	69.40	80.97	92.53	104.10	127.23	150.37	173.50	208.20
Winsley Parish Council	19.78	23.08	26.37	29.67	36.26	42.86	49.45	59.34
Winterbourne Parish Council	30.93	36.08	41.24	46.39	56.70	67.01	77.32	92.78
Winterbourne Stoke Parish Council	71.68	83.63	95.57	107.52	131.41	155.31	179.20	215.04
Winterslow Parish Council	48.15	56.18	64.20	72.23	88.28	104.33	120.38	144.46
Woodborough Parish Council	34.24	39.95	45.65	51.36	62.77	74.19	85.60	102.72
Woodford Parish Council	20.13	23.48	26.84	30.19	36.90	43.61	50.32	60.38
Wootton Rivers Parish Council	16.84	19.65	22.45	25.26	30.87	36.49	42.10	50.52
Worton Parish Council	25.32	29.54	33.76	37.98	46.42	54.86	63.30	75.96
Wylve Parish Council	24.49	28.57	32.65	36.73	44.89	53.05	61.22	73.46
Yatton Keynell Parish Council	25.39	29.62	33.85	38.08	46.54	55.00	63.47	76.16
Zeals Parish Council	12.08	14.09	16.11	18.12	22.15	26.17	30.2	36.24

Wiltshire Council - Town & Parish Precepts 2020/2021

Parish/Town Council	2019/2020			2020/2021			C Tax
	Tax Base	Precept (£)	Council Tax Band D (£)	Tax Base	Precept (£)	Council Tax Band D (£)	Increase/ (Decrease)
Aldbourn Parish Council	791.83	34,000.00	42.94	802.40	36,000.00	44.87	4.49%
Alderbury Parish Council	958.10	47,876.26	49.97	985.22	50,701.00	51.46	2.98%
All Cannings Parish Council	275.75	15,798.00	57.29	275.83	16,271.94	58.99	2.97%
Allington Parish Council	209.61	9,660.00	46.09	207.45	10,000.00	48.20	4.58%
Alton Parish Council	111.67	5,000.00	44.77	112.52	5,000.00	44.44	(0.74%)
Alvediston Parish Meeting	47.60	0.00	0.00	46.86	0.00	0.00	0.00%
Amesbury Town Council	4,201.92	412,066.00	98.07	4,383.82	509,700.00	116.27	18.56%
Ansty Parish Council	73.98	2,100.00	28.39	78.50	2,150.00	27.39	(3.52%)
Ashton Keynes Parish Council	685.09	33,650.00	49.12	687.40	35,450.00	51.57	4.99%
Atworth Parish Council	492.85	28,521.00	57.87	490.36	28,328.00	57.77	(0.17%)
Avebury Parish Council	218.57	12,700.00	58.10	216.50	13,787.00	63.68	9.60%
Barford St Martin Parish Council	208.49	9,270.00	44.46	207.06	9,360.00	45.20	1.66%
Baydon Parish Council	300.49	17,000.00	56.57	301.61	0.00	0.00	(100.00%)
Beechingstoke Parish Council	67.15	0.00	0.00	66.89	0.00	0.00	0.00%
Berwick Bassett & W/Bourne Monkton Parish Council	91.46	4,500.00	49.20	92.72	4,522.00	48.77	(0.87%)
Berwick St James Parish Council	82.88	2,000.00	24.13	80.60	2,000.00	24.81	2.82%
Berwick St John Parish Council	135.81	7,300.00	53.75	133.04	7,300.00	54.87	2.08%
Berwick St Leonard Parish Council	15.10	0.00	0.00	14.06	0.00	0.00	0.00%
Biddestone Parish Council	257.59	8,330.00	32.34	255.29	9,041.22	35.42	9.52%
Bishops Cannings Parish Council	1,194.94	58,145.00	48.66	1,265.91	58,276.00	46.03	(5.40%)
Bishopstone Parish Council	276.74	8,860.00	32.02	280.76	9,746.00	34.71	8.40%
Bishopstrow Parish Council	71.86	1,400.00	19.48	71.78	1,400.00	19.50	0.10%
Bowerchalke Parish Council	178.65	5,400.00	30.23	181.34	5,400.00	29.78	(1.49%)
Box Parish Council	1,691.93	150,346.00	88.86	1,736.18	153,739.00	88.55	(0.35%)
Boyton Parish Council	87.13	1,397.50	16.04	85.14	1,397.50	16.41	2.31%
Bradford On Avon Town Council	4,015.37	744,390.00	185.39	4,082.94	885,590.00	216.90	17.00%
Bratton Parish Council	500.65	35,581.00	71.07	497.46	37,122.00	74.62	5.00%
Braydon Parish Council	30.79	0.00	0.00	30.52	0.00	0.00	0.00%
Bremhill Parish Council	466.79	8,950.00	19.17	470.62	9,200.00	19.55	1.98%
Brinkworth Parish Council	626.90	25,358.11	40.45	628.45	25,827.54	41.10	1.61%
Britford Parish Council	168.41	2,650.00	15.74	173.35	3,500.00	20.19	28.27%
Broad Hinton & W/Bourne Bassett Parish Council	394.09	6,400.02	16.24	396.28	6,693.17	16.89	4.00%
Broad Town Parish Council	270.58	9,868.00	36.47	272.59	9,772.32	35.85	(1.70%)
Broadchalke Parish Council	322.18	6,950.00	21.57	321.82	8,468.00	26.31	21.97%
Brokenborough Parish Council	100.68	1,608.60	15.98	100.85	1,608.60	15.95	(0.19%)
Bromham Parish Council	776.01	39,000.00	50.26	765.75	40,000.00	52.24	3.94%
Broughton Gifford Parish Council	362.72	12,800.00	35.29	355.54	14,080.00	39.60	12.21%
Bulford Parish Council	1,316.79	57,079.32	43.35	1,381.14	55,495.01	40.18	(7.31%)
Bulkington Parish Council	117.41	4,837.00	41.20	120.27	5,660.00	47.06	14.22%
Burbage Parish Council	838.51	30,335.00	36.18	850.31	33,000.00	38.81	7.27%
Burcombe Parish Council	64.46	3,091.00	47.95	64.36	3,091.00	48.03	0.17%
Buttermere Parish Council	31.60	0.00	0.00	32.72	0.00	0.00	0.00%
Calne Town Council	6,055.49	1,273,530.00	210.31	6,075.77	1,309,754.00	215.57	2.50%
Calne Without Parish Council	1,335.57	24,000.00	17.97	1,356.54	28,161.00	20.76	15.53%
Castle Combe Parish Council	172.85	5,500.00	31.82	174.53	5,750.00	32.95	3.55%
Chapmanslade Parish Council	315.08	5,600.00	17.77	312.73	5,700.00	18.23	2.59%
Charlton Parish Council	237.70	8,500.00	35.76	241.89	10,000.00	41.34	15.60%
Charlton St Peter & Wilsford Parish Council	83.49	1,350.00	16.17	83.65	1,450.00	17.33	7.17%
Cherhill Parish Council	354.01	8,000.00	22.60	354.12	11,000.00	31.06	37.43%
Cheverell Magna (Great Cheverell) Parish Council	245.54	10,118.00	41.21	245.98	10,118.00	41.13	(0.19%)

Wiltshire Council - Town & Parish Precepts 2020/2021

Parish/Town Council	2019/2020			2020/2021			C Tax Increase/ (Decrease)
	Tax Base	Precept (£)	Council Tax Band D (£)	Tax Base	Precept (£)	Council Tax Band D (£)	
Chicklade Parish Council	39.49	0.00	0.00	38.10	0.00	0.00	0.00%
Chilmark Parish Council	243.57	8,250.00	33.87	243.25	8,500.00	34.94	3.16%

Wiltshire Council - Town & Parish Precepts 2020/2021

Parish/Town Council	2019/2020			2020/2021			C Tax Increase/ (Decrease)
	Tax Base	Precept (£)	Council Tax Band D (£)	Tax Base	Precept (£)	Council Tax Band D (£)	
Chilton Foliat Parish Council	194.55	7,154.00	36.77	191.53	7,280.00	38.01	3.37%
Chippenham Town Council	12,305.39	2,948,550.00	239.61	12,349.77	3,236,261.00	262.05	9.37%
Chippenham Without Parish Council	92.47	9,000.00	97.33	92.01	10,000.00	108.68	11.66%
Chirton Parish Council	177.46	12,000.00	67.62	183.00	12,600.00	68.85	1.82%
Chitterne Parish Council	137.92	9,800.00	71.06	138.47	9,800.00	70.77	(0.41%)
Cholderton Parish Council	90.24	4,512.00	50.00	89.81	4,670.12	52.00	4.00%
Christian Malford Parish Council	354.47	12,232.24	34.51	355.33	23,589.00	66.39	92.38%
Chute Forest Parish Council	91.98	4,782.00	51.99	90.87	4,782.00	52.62	1.21%
Chute Parish Council	170.70	7,900.00	46.28	167.78	8,500.00	50.66	9.46%
Clarendon Park Parish Council	127.25	2,000.00	15.72	129.98	1,500.00	11.54	(26.59%)
Clyffe Pypard Parish Council	150.91	3,000.00	19.88	153.33	3,000.00	19.57	(1.56%)
Codford Parish Council	351.54	16,358.00	46.53	353.83	15,706.00	44.39	(4.60%)
Colerne Parish Council	956.33	59,839.65	62.57	973.57	61,496.00	63.17	0.96%
Collingbourne Ducis Parish Council	383.09	22,073.65	57.62	381.32	22,410.18	58.77	2.00%
Collingbourne Kingston Parish Council	223.98	13,500.00	60.27	228.20	14,500.00	63.54	5.43%
Compton Bassett Parish Council	116.79	5,000.00	42.81	111.79	5,000.00	44.73	4.48%
Compton Chamberlayne Parish Council	61.50	2,650.00	43.09	60.04	2,800.00	46.64	8.24%
Coombe Bissett Parish Council	363.58	11,000.00	30.25	368.86	11,000.00	29.82	(1.42%)
Corsham Town Council	4,882.59	823,900.00	168.74	4,947.67	985,035.00	199.09	17.99%
Corsley Parish Council	356.50	9,553.63	26.80	362.11	9,479.43	26.18	(2.31%)
Coulston Parish Council	81.08	3,078.61	37.97	79.70	3,386.00	42.48	11.88%
Cricklade Town Council	1,561.21	307,129.00	196.72	1,547.13	315,293.00	203.79	3.59%
Crudwell Parish Council	525.89	15,666.26	29.79	527.25	15,706.78	29.79	0.00%
Dauntsey Parish Council	260.40	18,000.00	69.12	258.91	18,000.00	69.52	0.58%
Devizes Town Council	5,852.41	924,185.00	157.92	5,889.47	1,037,180.00	176.11	11.52%
Dilton Marsh Parish Council	722.87	29,394.00	40.66	717.49	30,982.00	43.18	6.20%
Dinton Parish Council	308.99	11,700.00	37.87	309.87	13,905.00	44.87	18.48%
Donhead St Andrew Parish Council	253.71	9,000.00	35.47	251.25	12,000.00	47.76	34.65%
Donhead St Mary Parish Council	476.28	15,352.00	32.23	474.28	15,659.00	33.02	2.45%
Downton Parish Council	1,394.39	112,247.66	80.50	1,398.00	114,865.04	82.16	2.06%
Durnford Parish Council	184.33	3,159.67	17.14	187.69	3,280.82	17.48	1.98%
Durrington Town Council	2,366.04	139,000.00	58.75	2,414.45	170,000.00	70.41	19.85%
East Kennett Parish Council	53.29	0.00	0.00	54.61	0.00	0.00	0.00%
East Knoyle Parish Council	346.73	9,975.00	28.77	346.09	10,225.00	29.54	2.68%
Easterton Parish Council	240.77	15,745.00	65.39	244.27	16,500.00	67.55	3.30%
Easton Grey Parish Council	44.33	200.00	4.51	43.88	200.00	4.56	1.11%
Easton Royal Parish Council	141.02	6,500.00	46.09	139.95	6,500.00	46.45	0.78%
Ebbesbourne Wake Parish Council	107.35	3,500.00	32.60	105.72	3,500.00	33.11	1.56%
Edington Parish Council	326.45	10,000.00	30.63	330.40	13,000.00	39.35	28.47%
Enford Parish Council	260.71	16,090.00	61.72	257.33	16,307.00	63.37	2.67%
Erlestoke Parish Council	91.62	6,805.00	74.27	94.64	6,805.00	71.90	(3.19%)
Etchilhampton Parish Council	71.86	3,250.00	45.23	72.29	3,750.00	51.87	14.68%
Everleigh Parish Council	94.09	3,673.86	39.05	91.54	3,647.58	39.85	2.05%
Figheldean Parish Council	231.97	19,098.09	82.33	227.47	19,098.00	83.96	1.98%
Firsdown Parish Council	277.04	15,240.00	55.01	276.21	18,100.00	65.53	19.12%
Fittleton Parish Council	113.11	6,288.00	55.59	112.66	6,396.00	56.77	2.12%
Fonthill Bishop Parish Council	44.89	0.00	0.00	44.23	0.00	0.00	0.00%
Fonthill Gifford Parish Council	63.02	2,000.00	31.74	63.38	2,400.00	37.87	19.31%
Fovant Parish Council	336.45	9,850.00	29.28	340.32	12,380.00	36.38	24.25%
Froxfield Parish Council	148.56	7,500.00	50.48	149.90	7,500.00	50.03	(0.89%)

Wiltshire Council - Town & Parish Precepts 2020/2021

Parish/Town Council	2019/2020			2020/2021			C Tax Increase/ (Decrease)
	Tax Base	Precept (£)	Council Tax Band D (£)	Tax Base	Precept (£)	Council Tax Band D (£)	
Fyfield & West Overton Parish Council	406.87	15,000.00	36.87	399.54	19,000.00	47.55	28.97%

Wiltshire Council - Town & Parish Precepts 2020/2021

Parish/Town Council	2019/2020			2020/2021			C Tax Increase/ (Decrease)
	Tax Base	Precept (£)	Council Tax Band D (£)	Tax Base	Precept (£)	Council Tax Band D (£)	
Grafton Parish Council	340.72	8,500.00	24.95	341.49	9,000.00	26.36	5.65%
Great Bedwyn Parish Council	576.47	18,000.00	31.22	575.53	20,000.00	34.75	11.31%
Great Hinton Parish Council	101.88	3,000.00	29.45	101.75	3,000.00	29.48	0.10%
Great Somerford Parish Council	382.54	9,000.00	23.53	382.76	11,000.00	28.74	22.14%
Great Wishford Parish Council	138.18	4,500.00	32.57	141.20	4,500.00	31.87	(2.15%)
Grimstead Parish Council	278.92	10,000.00	35.85	281.67	10,000.00	35.50	(0.98%)
Grittleton Parish Council	285.64	3,957.00	13.85	284.51	3,940.00	13.85	0.00%
Ham Parish Council	109.42	1,500.00	13.71	109.75	1,500.00	13.67	(0.29%)
Hankerton Parish Council	154.67	4,100.00	26.51	154.61	4,750.00	30.72	15.88%
Heddington Parish Council	197.08	5,000.00	25.37	197.58	5,514.46	27.91	10.01%
Heytesbury & Knook Parish Council	349.22	11,817.60	33.84	346.56	14,661.00	42.30	25.00%
Heywood Parish Council	311.02	5,610.00	18.04	313.32	5,934.28	18.94	4.99%
Hilmarton Parish Council	308.53	8,000.00	25.93	310.09	8,000.00	25.80	(0.50%)
Hilperton Parish Council	1,619.24	23,122.00	14.28	1,621.49	23,154.88	14.28	0.00%
Hindon Parish Council	238.08	14,000.00	58.80	235.82	14,000.00	59.37	0.97%
Holt Parish Council	676.95	25,200.00	37.23	675.55	30,243.00	44.77	20.25%
Horningsham Parish Council	169.97	15,303.45	90.04	169.86	15,677.00	92.29	2.50%
Hullavington Parish Council	497.21	21,120.00	42.48	494.77	23,000.00	46.49	9.44%
Idmiston Parish Council	902.01	39,254.00	43.52	920.89	50,920.00	55.29	27.05%
Keevil Parish Council	227.81	6,683.00	29.34	228.12	7,361.00	32.27	9.99%
Kilminster Parish Council	137.18	6,819.00	49.71	136.64	7,039.00	51.51	3.62%
Kington Langley Parish Council	379.52	20,796.00	54.80	374.24	21,212.00	56.68	3.43%
Kington St Michael Parish Council	326.36	26,752.28	81.97	324.15	30,738.00	94.83	15.69%
Lacock Parish Council	504.67	17,824.00	35.32	507.32	20,673.40	40.75	15.37%
Landford Parish Council	967.68	50,000.00	51.67	964.07	51,000.00	52.90	2.38%
Langley Burrell Parish Council	184.13	13,200.00	71.69	299.40	22,455.00	75.00	4.62%
Latton Parish Council	248.84	9,453.43	37.99	250.41	11,846.00	47.31	24.53%
Laverstock & Ford Parish Council	3,686.75	177,963.00	48.27	3,803.85	187,179.00	49.21	1.95%
Lea & Cleverton Parish Council	414.70	12,336.00	29.75	421.02	12,950.00	30.76	3.39%
Leigh Parish Council	147.26	4,179.00	28.38	149.22	4,179.00	28.01	(1.30%)
Limpley Stoke Parish Council	305.32	21,311.00	69.80	303.93	21,640.00	71.20	2.01%
Little Bedwyn Parish Council	134.13	3,095.00	23.07	133.23	3,095.00	23.23	0.69%
Little Cheverell Parish Council	83.08	2,500.00	30.09	82.09	2,470.00	30.09	0.00%
Little Somerford Parish Council	186.20	9,000.00	48.34	185.88	9,500.00	51.11	5.73%
Longbridge Deverill Parish Council	396.26	7,800.00	19.68	399.52	7,800.00	19.52	(0.81%)
Luckington Parish Council	304.73	9,162.39	30.07	305.91	9,620.50	31.45	4.59%
Ludgershall Town Council	1,547.74	161,964.00	104.65	1,733.81	201,794.00	116.39	11.22%
Lydiard Millicent Parish Council	769.00	52,800.00	68.66	782.41	54,800.00	70.04	2.01%
Lydiard Tregoze Parish Council	221.09	7,500.00	33.92	218.83	8,500.00	38.84	14.50%
Lyneham & Bradenstoke Parish Council	1,534.43	42,063.00	27.41	1,577.34	48,704.00	30.88	12.66%
Maiden Bradley Parish Council	133.37	17,056.37	127.89	136.84	24,234.36	177.10	38.48%
Malmesbury Town Council	2,196.04	451,264.26	205.49	2,172.47	457,587.36	210.63	2.50%
Manningford Parish Council	194.65	6,400.00	32.88	196.55	6,950.00	35.36	7.54%
Marden Parish Council	56.77	2,000.00	35.23	58.36	2,000.00	34.27	(2.72%)
Market Lavington Parish Council	768.64	56,370.00	73.34	765.86	64,030.00	83.61	14.00%
Marlborough Town Council	3,432.93	669,875.00	195.13	3,504.70	723,257.00	206.37	5.76%
Marston Meysey Parish Council	113.52	3,508.90	30.91	110.67	4,721.66	42.66	38.01%
Marston Parish Council	76.88	2,000.00	26.01	79.30	2,200.00	27.74	6.65%
Melksham Town Council	5,517.70	844,910.00	153.13	5,510.24	884,122.00	160.45	4.78%
Melksham Without Parish Council	2,656.84	201,108.10	75.69	2,754.09	221,234.00	80.33	6.13%

Wiltshire Council - Town & Parish Precepts 2020/2021

Parish/Town Council	2019/2020			2020/2021			C Tax Increase/ (Decrease)
	Tax Base	Precept (£)	Council Tax Band D (£)	Tax Base	Precept (£)	Council Tax Band D (£)	
Mere Parish Council	1,169.96	146,206.38	124.97	1,190.64	157,978.00	132.68	6.17%

Wiltshire Council - Town & Parish Precepts 2020/2021

Parish/Town Council	2019/2020			2020/2021			C Tax Increase/ (Decrease)
	Tax Base	Precept (£)	Council Tax Band D (£)	Tax Base	Precept (£)	Council Tax Band D (£)	
Mildenhall Parish Council	218.84	22,000.00	100.53	218.77	20,000.00	91.42	(9.06%)
Milston Parish Council	55.03	900.00	16.35	58.35	950.00	16.28	(0.43%)
Milton Lilbourne Parish Council	270.04	12,770.19	47.29	275.60	13,945.36	50.60	7.00%
Minety Parish Council	700.29	17,000.00	24.28	700.97	17,964.00	25.63	5.56%
Monkton Farleigh Parish Council	180.65	6,200.00	34.32	181.21	6,500.00	35.87	4.52%
Netheravon Parish Council	380.26	26,949.00	70.87	382.08	27,635.00	72.33	2.06%
Netherhampton Parish Council	68.85	1,455.00	21.13	68.53	2,743.00	40.03	89.45%
Nettleton Parish Council	353.49	6,000.00	16.97	350.58	6,000.00	17.11	0.82%
Newton Toney Parish Council	169.95	13,640.00	80.26	169.18	14,257.00	84.27	5.00%
North Bradley Parish Council	688.67	13,975.00	20.29	685.21	15,095.00	22.03	8.58%
North Newnton Parish Council	202.78	15,500.00	76.44	198.52	16,500.00	83.12	8.74%
North Wraxall Parish Council	218.21	7,320.20	33.55	218.43	9,320.00	42.67	27.18%
Norton & Foxley Parish Meeting	64.41	0.00	0.00	67.62	0.00	0.00	0.00%
Norton Bavant Parish Council	57.69	0.00	0.00	58.35	0.00	0.00	0.00%
Oaksey Parish Council	249.74	17,425.00	69.77	254.02	18,900.00	74.40	6.64%
Odstock Parish Council	252.11	12,060.00	47.84	255.73	15,075.00	58.95	23.22%
Ogbourne St Andrew Parish Council	192.20	3,844.00	20.00	195.36	3,907.20	20.00	0.00%
Ogbourne St George Parish Council	231.38	13,330.75	57.61	232.92	13,418.52	57.61	0.00%
Orcheston Parish Council	108.54	2,250.00	20.73	107.24	2,200.00	20.51	(1.06%)
Patney Parish Council	67.37	1,000.00	14.84	67.64	1,000.00	14.78	(0.40%)
Pewsey Parish Council	1,558.95	101,850.00	65.33	1,557.83	127,312.00	81.72	25.09%
Pitton & Farley Parish Council	372.10	11,000.00	29.56	369.15	12,580.00	34.08	15.29%
Potterne Parish Council	595.01	26,011.00	43.72	595.81	25,824.00	43.34	(0.87%)
Poulshot Parish Council	157.02	12,277.00	78.19	156.13	12,277.00	78.63	0.56%
Preshute Parish Council	84.24	4,000.00	47.48	84.69	4,021.00	47.48	0.00%
Purton Parish Council	2,437.65	299,416.55	122.83	2,474.34	311,816.33	126.02	2.60%
Quidhampton Parish Council	156.14	9,210.00	58.99	155.45	11,500.00	73.98	25.41%
Ramsbury Parish Council	944.85	52,000.00	55.04	947.21	54,845.00	57.90	5.20%
Redlynch Parish Council	1,188.15	45,660.60	38.43	1,195.90	46,000.00	38.46	0.08%
Rowde Parish Council	496.95	35,074.73	70.58	493.61	37,973.42	76.93	9.00%
Royal Wootton Bassett Town Council	4,755.75	974,025.00	204.81	4,737.94	994,067.00	209.81	2.44%
Rushall Parish Council	75.42	6,101.00	80.89	74.69	6,538.00	87.54	8.22%
Salisbury City Council	14,501.07	3,016,222.00	208.00	14,731.41	3,064,133.00	208.00	0.00%
Savernake Parish Council	137.02	1,288.00	9.40	137.94	1,300.00	9.42	0.21%
Seagry Parish Council	173.22	15,000.00	86.60	169.85	17,000.00	100.09	15.58%
Sedgehill & Semley Parish Council	290.58	10,000.00	34.41	297.46	12,000.00	40.34	17.23%
Seend Parish Council	536.92	20,013.00	37.27	531.58	20,381.00	38.34	2.87%
Semington Parish Council	385.73	13,000.00	33.70	388.80	13,500.00	34.72	3.03%
Shalbourne Parish Council	328.80	8,500.00	25.85	330.10	9,000.00	27.26	5.45%
Sherrington Parish Council	35.99	0.00	0.00	36.21	0.00	0.00	0.00%
Sherston Parish Council	725.78	34,825.00	47.98	727.77	42,175.00	57.95	20.78%
Shrewton Parish Council	769.92	20,000.00	25.98	780.24	10,000.00	12.82	(50.65%)
Sopworth Parish Council	68.49	500.00	7.30	68.44	500.00	7.31	0.14%
South Newton Parish Council	229.52	5,875.71	25.60	230.93	6,502.99	28.16	10.00%
South Wraxall Parish Council	227.31	4,000.00	17.60	227.26	4,200.00	18.48	5.00%
Southwick Parish Council	757.40	22,000.00	29.05	757.75	22,012.00	29.05	0.00%
St Paul Without	1,026.91	15,988.99	15.57	1,022.98	17,523.65	17.13	10.02%
Stanton St Bernard Parish Council	83.22	3,640.00	43.74	81.49	3,700.00	45.40	3.80%
Stanton St Quintin Parish Council	266.38	7,500.00	28.16	263.55	8,000.00	30.35	7.78%
Stapleford Parish Council	143.68	6,000.00	41.76	144.73	6,000.00	41.46	(0.72%)

Wiltshire Council - Town & Parish Precepts 2020/2021

Parish/Town Council	2019/2020			2020/2021			C Tax Increase/ (Decrease)
	Tax Base	Precept (£)	Council Tax Band D (£)	Tax Base	Precept (£)	Council Tax Band D (£)	
Staverton Parish Council	687.70	24,012.00	34.92	686.94	25,907.00	37.71	7.99%
Steeple Ashton Parish Council	444.72	22,587.33	50.79	443.10	23,068.00	52.06	2.50%
Steeple Langford Parish Council	243.53	5,000.00	20.53	245.67	5,000.00	20.35	(0.88%)
Stert Parish Council	93.78	1,700.00	18.13	90.72	1,800.00	19.84	9.43%
Stockton Parish Council	87.08	350.00	4.02	87.57	500.00	5.71	42.04%
Stourton Parish Council	100.96	2,365.00	23.43	102.31	2,671.00	26.11	11.44%
Stratford Tony Parish Council	32.83	0.00	0.00	33.35	0.00	0.00	0.00%
Sutton Benger Parish Council	545.85	12,101.49	22.17	542.37	19,233.19	35.46	59.95%
Sutton Mandeville Parish Council	135.74	1,600.00	11.79	130.39	1,600.00	12.27	4.07%
Sutton Veny Parish Council	320.72	12,719.76	39.66	317.25	12,582.14	39.66	0.00%
Swallowcliffe Parish Council	106.37	6,293.00	59.16	108.32	4,720.00	43.57	(26.35%)
Teffont Parish Council	149.66	7,612.26	50.86	156.29	7,764.50	49.68	(2.32%)
Tidcombe & Fosbury Parish Council	57.99	0.00	0.00	57.41	0.00	0.00	0.00%
Tidworth Town Council	2,750.51	409,000.00	148.70	2,872.54	448,000.00	155.96	4.88%
Tilshead Parish Council	131.43	7,240.00	55.09	134.24	7,220.00	53.78	(2.38%)
Tisbury Parish Council	960.90	97,795.00	101.77	962.83	106,938.00	111.07	9.14%
Tockenham Parish Council	118.88	7,000.00	58.88	119.85	7,000.00	58.41	(0.80%)
Tollard Royal Parish Council	63.38	4,685.00	73.92	64.02	4,732.36	73.92	0.00%
Trowbridge Town Council	11,673.87	1,797,593.00	153.98	11,740.34	1,936,950.00	164.98	7.14%
Upavon Parish Council	471.38	23,000.00	48.79	459.80	31,000.00	67.42	38.18%
Upper Deverills Parish Council	172.26	8,373.00	48.61	174.49	8,482.00	48.61	0.00%
Upton Lovell Parish Council	90.11	3,125.00	34.68	89.91	3,125.00	34.76	0.23%
Upton Scudamore Parish Council	142.72	3,608.00	25.28	141.60	3,608.00	25.48	0.79%
Urchfont Parish Council	537.59	49,216.36	91.55	544.15	50,812.73	93.38	2.00%
Warminster Town Council	6,146.54	786,483.00	127.96	6,157.26	1,180,666.00	191.75	49.85%
West Ashton Parish Council	233.94	7,250.00	30.99	228.58	7,500.00	32.81	5.87%
West Dean Parish Council	106.84	9,700.00	90.79	107.43	11,200.00	104.25	14.83%
West Knoyle Parish Council	68.09	4,400.00	64.62	68.52	4,550.00	66.40	2.75%
West Lavington Parish Council	477.63	31,281.00	65.49	477.39	31,889.00	66.80	2.00%
West Tisbury Parish Council	282.85	9,990.00	35.32	277.66	9,990.00	35.98	1.87%
Westbury Town Council	5,072.88	674,318.00	132.93	5,112.62	881,658.00	172.45	29.73%
Westwood Parish Council	484.09	25,500.00	52.68	484.12	32,500.00	67.13	27.43%
Whiteparish Parish Council	712.33	30,195.67	42.39	716.28	50,500.00	70.50	66.31%
Wilcot & Huish Parish Council	275.47	7,205.00	26.16	273.67	8,650.00	31.61	20.83%
Wilsford-cum-Lake Parish Council	63.64	0.00	0.00	62.20	500.00	8.04	0.00%
Wilton Town Council	1,578.48	217,927.00	138.06	1,615.51	243,187.00	150.53	9.03%
Wingfield Parish Council	161.88	13,500.00	83.40	158.50	16,500.00	104.10	24.82%
Winsley Parish Council	930.90	27,000.00	29.00	943.87	28,000.00	29.67	2.31%
Winterbourne Parish Council	572.11	24,750.00	43.26	555.02	25,750.00	46.39	7.24%
Winterbourne Stoke Parish Council	84.75	9,090.00	107.26	84.54	9,090.00	107.52	0.24%
Winterslow Parish Council	911.97	63,956.46	70.13	913.97	66,016.00	72.23	2.99%
Woodborough Parish Council	144.27	6,325.00	43.84	146.03	7,500.00	51.36	17.15%
Woodford Parish Council	231.36	6,496.59	28.08	241.19	7,281.53	30.19	7.51%
Wootton Rivers Parish Council	124.11	2,986.09	24.06	126.21	3,188.06	25.26	4.99%
Worton Parish Council	265.79	10,129.00	38.11	265.76	10,093.00	37.98	(0.34%)
Wylve Parish Council	218.13	5,500.00	25.21	217.82	8,000.00	36.73	45.70%
Yatton Keynell Parish Council	370.72	14,117.00	38.08	370.00	14,090.00	38.08	0.00%
Zeals Parish Council	280.78	5,041.00	17.95	278.26	5,041.00	18.12	0.95%
TOTAL / AVERAGE	186,013.00	21,702,097.02	116.67	187,935.69	23,899,895.13	127.17	9.00%

Wiltshire Council

Council

25 February 2020

Pay Policy Statement

Summary

Under section 38 of the Localism Act 2011 every local authority was required to prepare and publish a pay policy statement for the financial year 2012/13 and this must be updated in each subsequent financial year.

The statement has been updated for 2020/21 with minor revisions.

In addition, the total number of council employees and the latest pay ratios has been updated.

Proposals

That Council approve the updated Pay Policy Statement set out in Appendix 1.

Reason for Proposal

The proposals set out in the report and pay policy statement reflect the council's commitment to openness and transparency and meet the requirements of the Localism Act 2011 and the Code of Recommended Practice for Local Authorities on Data Transparency 2015.

Joanne Pitt
Director – HR&OD

Pay Policy Statement

Purpose of Report

1. This report presents the updated pay policy statement for 2020/21 which applies to all non-schools employees of Wiltshire Council, except for centrally employed teachers who are covered by the teachers' pay policy.

Background

2. Under section 38 of the Localism Act 2011 every local authority is required to update their pay policy statement each financial year.
3. Wiltshire Council published its first pay policy statement in February 2012 and is required to publish an updated policy by 1 April 2020.
4. The legislation requires that approval of the pay policy statement is sought from full council.

Main Considerations for the Council

5. The pay policy statement has been updated to include:
 - A revised introduction providing an update on the council's progress with apprenticeships, annual budget and workforce total.
 - An amendment to the reference of Corporate Director following the tier 1 restructure and the change in job title to Chief Executive Officer.
 - A clarification of the arrangements for agreeing the severance packages for chief and senior officers and when these may come to full council for approval.
 - An amendment to the reference to the role of Acting Returning Officer following the tier 1 restructure. It is proposed that this is carried out at Chief Executive Officer level, subject to agreement at full Council.
 - An updated total number of council employees and the latest pay ratios.
6. The current ratio of lowest paid to highest paid employee within the council is 9.1:1 and is lower than last year at 9.4:1 which reflects the increase in pay rates

at the lower end of the pay scale due to increases in the national living wage.

7. The Code of Data Transparency 2015 requires the ratio of median salary to the highest paid employee to be published for every local authority. This is currently 6.0:1 which compares favourably with other councils in the south west.
8. At its meeting on 8 January 2020 Staffing Policy Committee approved the pay policy statement and recommended it be put forward for approval by full council.

Environmental and climate change considerations

10. No environmental and climate change considerations have been identified.

Equalities Impact of the Proposal

11. The pay policy statement was equality impact assessed on 1st February 2012 and no negative impacts were identified. No significant changes have been made requiring a further assessment for 2020/21.

Risk Assessment

12. The council is required to publish their pay policy statement in order to comply with the requirements of the Localism Act 2011.
13. The pay policy statement clearly outlines that the employment terms and allowances for senior staff are not more beneficial than those of the lowest paid staff.

Financial Implications

14. The employment policies referred to within the pay policy statement (appendix 1) are already in existence and therefore there is no additional cost.

Legal Implications

15. Legal services, upon reviewing the overriding legislation, confirm that there are no legal implications arising from the proposed pay policy statement.

Conclusions

16. The council is required to update their pay policy statement in order to comply with the requirements of the Localism Act 2011.
17. Full council is recommended to approve the pay policy statement for 2020/21.

Joanne Pitt
Director – HR&OD

Report Author: Laura Fisher, HR Pay & Reward Consultant
Date of report: 25 February 2020

Appendices

Appendix 1 – Pay Policy Statement (2020/21 update)

Wiltshire Council Human Resources Pay Policy Statement

This policy can be made available in other languages and formats such as large print and audio on [request](#).

What is it?

The pay policy statement sets out the council's approach to pay and reward for senior managers and the lowest paid employees for the financial year 2020-21.

Its purpose is to provide a clear and transparent policy, which demonstrates accountability and value for money. The policy also meets the council's obligations under the Localism Act 2011 and the Code of Recommended Practice for Local Authorities on Data Transparency.

The pay policy is applicable to council staff and does not include schools support staff or teachers.

The pay policy statement sets out the authority's policies for council staff for the financial year relating to:

- the remuneration of chief officers
- the remuneration of the lowest-paid employees
- the relationship between the remuneration of chief officers and employees who are not chief officers.

Remuneration for the purposes of this statement includes the following elements:

- basic salary
- any other allowances arising from employment

The term "chief officer" in this instance applies to more posts than the usual council definition, and includes the following senior manager roles:

Chief Executive Officer
Director
Head of Service
Some strategic and technical specialist roles

The term "lowest paid employees" refers to those employees on the lowest pay point of our grading system which is currently spinal column point 1, £17,364 per annum.

Go straight to the section:

- [Introduction](#)
- [Who does it apply to?](#)
- [When does it apply?](#)
- [What are the main points?](#)
- [The level and elements of remuneration for employees](#)
- [Remuneration on recruitment](#)
- [Increases and additions to remuneration](#)
- [The use of performance-related pay](#)
- [The use of bonuses](#)
- [The approach to the payment of employees on their ceasing to be employed by the authority](#)
- [The pension scheme](#)
- [Any other allowances arising from employment](#)
- [Governance arrangements](#)
- [The publication of and access to information relating to remuneration of chief officers](#)
- [The relationship between the remuneration of chief officers and employees who are not chief officers.](#)

Introduction

Wiltshire Council is a large and complex organisation providing a wide range of services to the community, with a current annual budget of around £344m (2020/21).

In order to deliver these services around 4,798 people work for the council (non-schools) in a variety of diverse roles such as corporate director, social worker, public protection officer and general cleaner.

The council's ten year business plan was published in 2017. At the heart of the business plan the vision continues to be to create stronger communities, and the plan sets out the key actions that will be taken to deliver this. The key priorities of the business plan are to grow the economy, protect the vulnerable, build strong communities and ensure the council is innovative and effective across all services.

The coming year will be challenging with the council having to find innovative ways to deliver services within strict cost parameters. It is now more important than ever to ensure the council has the right people in the right place at the right time to deliver services.

The apprenticeship levy has been in place since April 2017 and the council has been paying a levy of 0.5% of the pay bill monthly into a digital apprenticeship account which is used to fund the cost of training for apprenticeships. As well as focussing on recruiting new apprentices, the council has also used the levy to fund upskilling current employees. To date 26 new apprentices have been recruited, 8 have completed apprenticeships and a further 194 employees have started apprenticeships to upskill.

Who does it apply to?

This pay policy statement applies to all non-schools employees of Wiltshire Council with the exception of Centrally Employed Teachers, who are covered by the Teacher's Pay Policy.

When does it apply?

This pay policy statement was first published in February 2012 and is updated on an annual basis. It has now been updated for the financial year 2020/21.

What are the main points?

1. This pay policy statement sets out the pay policies which apply to both the lowest paid and highest paid employees within the council.
2. In many cases the pay policies are the same for all employees. Where there are differences, these have been clearly outlined below.

The level and elements of remuneration for employees

3. In line with good employment practice the majority of jobs within the council have been evaluated using a job evaluation scheme. This is to ensure that jobs are graded fairly and equitably, and that the council complies with the Equal Pay Act.
4. A small number of jobs i.e. centrally employed teachers and Soulbury staff are subject to national salary scales which determine the pay for each job, and therefore the evaluation schemes do not apply.
5. The council uses two job evaluation schemes in order to rank jobs.

HAY job evaluation scheme:

6. The HAY job evaluation scheme is used to evaluate senior manager jobs within the council (currently 134 employees), which include the following roles:
 - Chief Executive Officer
 - Director
 - Head of Service
 - Strategic and technical specialists
7. Each job is assessed by a panel of three HAY trained evaluators. The evaluators consider the job against each HAY element and sub-element and apply the description and points that best fit the job being evaluated. The values awarded are subsequently added together to give a total job score.
8. The HAY Group periodically carry out quality control checks to ensure the consistency of job scores in line with the conventions of the scheme.

9. The job score determines the grade for the job. There are 8 HAY grades each currently containing a salary range over 3 spinal column points.
10. Details of the HAY evaluation scheme, the points to grades and salary bands are contained on HR Direct.
11. The council's policy is to pay the median market rate for the jobs evaluated using the HAY job evaluation scheme, and aims to ensure that the pay scales for HAY graded posts are sensitive to labour market pressures. There can be exceptions to this where the market pay for particular roles indicates that pay above the median may be required, in which case a market pay scale may be applied.
12. There are no national pay scales for senior roles so pay is a matter for local determination. Pay scales for HAY grades are determined using the HAY pay databank for the public and not for profit sector and increases are capped in line with the NJC pay award unless market pay data identifies a significant drift or where difficulties are identified with recruitment and retention of staff at this level (this is in line with the market supplements policy).

Greater London Provincial Council job evaluation (GLPC) scheme:

13. The GLPC job evaluation scheme is used to evaluate the majority of jobs within the council.
14. Each job is assessed by a panel of three trained GLPC evaluators. The evaluators consider each job against a suite of agreed role profiles that set out the level of work required of the grade within the relevant job family.
15. The council aims to ensure that the GLPC scheme is appropriately applied and that there is continuity and consistency in the results. The evaluation process has been checked externally by job evaluation specialists in the South West Councils organisation.
16. There are eight job families each containing a set of evaluated role profiles stating the requirements at each grade.
17. For jobs evaluated using the GLPC job evaluation scheme the national pay spine determined by the National Joint Council (NJC) for Local Government Services forms the basis of the council's pay and grading model, and changes to the national pay spine are subject to annual pay negotiations.
18. In April 2019 a new nationally agreed pay spine was implemented and staff were mapped across to a new pay spine in a new pay and grading model, implemented following collective agreement with the recognised trade unions.
19. The new pay and grading model contains 14 grades, with all grades containing three increments except for the lowest grade which has two increments.

Remuneration on recruitment

20. The same recruitment policies apply to all employees who take up a new appointment with the council, regardless of grade.
21. The council advertises all posts through the careers website, and may also employ a recruitment agency to provide a shortlist of candidates for senior manager jobs.
22. Candidates are normally appointed on the minimum salary of the grade for the post.
23. If a candidate is currently being paid above the minimum salary of the post they are applying for, the appointment may in some circumstances be on the next increment point above their current salary, subject to the maximum salary of the grade.
24. The recruitment procedure for Chief Executive Officer and Director posts is undertaken by the Officer Appointments Committee. This committee represents council for all Chief Executive and Director appointments. Once an appointment is proposed by the committee, cabinet is required to ratify the decision and salary level within the band before the appointment is confirmed.
25. In line with the requirements of the Localism Act 2011, all chief and senior officer jobs, including those paid over £100,000 per year, are evaluated using the HAY job evaluation scheme. The job is then allocated the appropriate existing HAY grade and pay band, and a salary offer will only be made within that pay band. There can be exceptions to this where the market pay for particular roles indicates that pay above the median may be required, in which case a market pay scale may be applied.
26. Where it is necessary for any newly appointed employee to relocate more than 15 miles in order to take up an appointment the council may make a contribution towards relocation expenses.

Market supplements

27. The council has a market supplement policy which stipulates that if there are recruitment and retention difficulties for a particular post, and it is shown that the council are paying below the market rate for the job, a market supplement or market pay scale may be paid.
28. Market supplements/market pay scales are only payable to a small number of jobs which are evaluated using the GLPC or HAY schemes.
29. Where skills shortages exist in specific areas, or where despite paying at the median market rate for the role the pay rate for the role is still not sufficient to recruit and retain the skills required, a rate higher than the market median may be paid. This could be an additional increment, a percentage market supplement, or

a market pay scale and requires the authorisation of the Director, HR&OD in conjunction with the Chief Executive Officers.

30. The level of market supplement applied to GLPC posts is determined by analysing market data from an external source e.g. Croner Solutions.
31. The data used for assessing market pay scales for HAY graded posts is the HAY pay databank for the public and not for profit sector. The HAY databank provides the market median, upper quartile and upper decile pay range for each HAY pay grade.

Salary protection

32. As a result of service redesign, employees may be redeployed to a role which is one grade lower than their current role. In this case, the employee will be in receipt of salary protection for a period of 12 months. Incremental progression and any negotiated pay award will not be applicable during the period of salary protection. Redeployment (and salary protection) is subject to the following criteria:
 - transferable skills,
 - knowledge of work / experience
 - agreement to undertake relevant training, which may include formal qualification
 - match behaviours framework and skills profile
 - working hours
 - location
33. In exceptional circumstances, where there is a national shortage of skills and experience in a particular role, employees may be redeployed to a role more than one grade lower than their current role. This would be authorised by the Director HR&OD.

Increases and additions to remuneration

34. The council's policy is to apply the nationally negotiated NJC pay award for GLPC graded employees which takes effect from 1st April each year and which applies to the national pay spine.
35. Most NJC employees received a pay award of 2% in April 2019, whilst those on the lower spinal points (below SCP 18) received a higher percentage increase.
36. For GLPC graded employees, increments are awarded automatically up to the maximum of the grade unless formal proceedings are taking place under the Improving Work Performance Policy. Increments are paid on the 1st April each year, or six months after the start date (if the starting date is between October and April). There is no provision for the payment of an increment at any other time, unless there are recruitment or retention difficulties.

37. The council's policy for HAY graded employees is to cap any pay award in line with the NJC pay award unless market pay data identifies a significant drift and difficulties are identified with recruitment and retention of staff at this level.
38. For HAY graded employees incremental progression through the grade is based on satisfactory performance measured over a 12 month period. Increments are paid on 1st April each year subject to satisfactory performance, and a minimum of 6 months in post at that time. There is no provision for the payment of an increment at any other time unless there are recruitment or retention difficulties.
39. The council also employs a small number of specialist employees covered by either Teachers or Soulbury salary scales which are also negotiated nationally.

The use of performance-related pay

40. It is the council's policy that HAY graded employees are subject to a performance appraisal each year. If the performance is measured as satisfactory, an increment may be awarded. If the performance does not meet the required standard an increment may be withheld.
41. For GLPC graded employees, increments are awarded automatically to the maximum of the grade unless formal proceedings are taking place under the Improving Work Performance Policy.

The use of bonuses

42. The council does not offer a bonus or honorarium scheme to any employee.

The approach to the payment of employees on their ceasing to be employed by the authority

43. Employees who leave the council's employment are entitled to payment of their contractual notice, along with any outstanding holiday pay.
44. All employees, including chief and senior officers, are subject to the same redundancy payments policy which has been agreed by Staffing Policy Committee.
45. There is no discretion to make redundancy payments which do not comply with the policy.
46. If employees choose to volunteer and are accepted for redundancy they are entitled to a payment calculated as follows:

Statutory weeks x normal weekly pay x 2.5, capped at 40 weeks, with a minimum payment of £3000 (pro rata for part time staff).

47. If employees choose not to volunteer for redundancy, and cannot be redeployed, they will leave on compulsory grounds. The payment is calculated as follows:

Statutory weeks x weekly salary (capped at £525), with a cap of 30 weeks pay or 20 years service. There is a minimum payment of £1500 (pro rata for part time staff).

48. If employees are aged 55 or over, and have been a member of the pension scheme for at least 2 years, they are able to receive their pension and lump sum early if their employment is terminated on grounds of redundancy.
49. No augmentation to pension will apply for any employee.
50. If employees are dismissed on redundancy grounds, and receive a voluntary (enhanced) redundancy payment, they may be considered for re-employment to posts within Wiltshire Council after the minimum statutory period of four weeks has elapsed subject to the following conditions:
 - The post did not exist or was not foreseeable at the time of the dismissal.
 - The vacancy has been advertised in accordance with Wiltshire Council policy and procedures.
 - The appointment was made on the basis of the best person for the job with regard to the usual selection procedures.
 - The appointment has corporate director approval.
51. These conditions apply for twelve months from the date of the dismissal, after which the employee may be considered for re-employment to any post within Wiltshire Council.
52. Under the Council's Constitution, the dismissal of chief and senior officers is delegated to the Senior Officers' Employment Sub-Committee which determines severance packages in accordance with the Council's policies. The Sub-Committee may, however, refer the matter to full Council for final determination in exceptional circumstances.

The pension scheme

53. All employees are entitled to join the Local Government Pension Scheme (LGPS).
54. The LGPS changed in 2014 and the benefits structure has moved from a Final Salary basis to a Career Average Revaluation Earnings (CARE) approach for benefits accruing after this date. Employee contribution bandings have also changed and the new regulations have introduced 9 bandings with rates varying between 5.5 – 12.5% according to the employee's salary, with the employer contributions varying on an annual basis.
55. The benefits of the scheme for all members include:
 - A tiered ill health retirement package if employees have to leave work at any age due to permanent ill health. This could give employees benefits,

paid straight away, and which could be increased if they are unlikely to be capable of gainful employment within 3 years of leaving.

- Early payment of benefits if employees are made redundant or retired on business efficiency grounds at age 55 or over.
- The right to voluntarily retire from age 55 (on an actuarially reduced pension)
- Flexible retirement from age 55 if employees reduce their hours, or move to a less senior position. Provided the employer agrees, employees can draw all of their benefits – helping them ease into their retirement.

56. Further information about the pension scheme can be found on the [pensions website](#).

Any other allowances arising from employment

Payment for acting up or additional duties

57. This policy applies only to all employees who, on a temporary basis:

- act up – carrying out the full responsibilities and duties of a higher graded post either for some or all of their working hours; or
- carry out some, but not all, duties or responsibilities of a higher graded post for some or all of their working hours; or
- take on additional duties within their role.

58. The policy allows for employees to receive the salary difference between the lower and higher graded job, calculated on a percentage basis if the additional duties are taken on for only part of the working week.

Unsocial hours allowances

59. The council provides an additional allowance, expressed as a percentage of the basic rate, for regularly working late evenings / early mornings / nights / Sundays. These payments are graduated according to the degree of unsocial hours working and range from 10% to 33% in addition to normal hourly rate.

60. Unsocial hours allowances are only payable for GLPC graded jobs, and are not available for senior managers.

Overtime allowances

61. The council has an overtime policy where all employees are entitled to receive additional payment for hours worked in excess of 37 hours. GLPC graded employees are able to claim overtime hours at their normal hourly rate x1.5 for hours worked on a Monday to Saturday, and x 2 for working a Sunday. HAY graded staff are only able to claim overtime in exceptional circumstances where there is an emergency situation and payment is based on the current highest spinal point (point 49) of the NJC pay scale.

Standby and callout allowances

62. The council has a standby and callout policy where all employees receive an allowance should they be on standby out of normal office hours. If employees are called out whilst on standby additional hours or overtime will be paid in accordance with the overtime policy.

Sleeping in allowance

63. The council pays a sleep-in allowance to employees required to sleep in on the premises. This includes up to 30 minutes call out per night, after which the additional hours provisions will apply. The sleep-in allowance payable is currently £36.08, and increases in line with the NJC pay award.

Local election duties – Acting Returning Officer

64. The role of Acting Returning Officer is carried out at Chief Executive Officer level (pending confirmation at Full Council). Fees are paid in line with the relevant legislation and guidance.

Governance arrangements

65. The council's policy is to apply the nationally negotiated NJC pay award to the pay scales for jobs evaluated using the GLPC job evaluation scheme.

66. There are no national pay scales for senior roles so pay is a matter for local determination. Pay scales for HAY grades are determined using the HAY pay databank for the public and not for profit sector.

67. The council also relies on national negotiation for some key provisions of employment such as the sickness and maternity schemes.

68. The council negotiates locally on some other conditions of employment, such as pay and grading, travel expenses, overtime payments and unsocial hours allowances.

69. For these local conditions of employment, the council consults and negotiates with the relevant trade unions, in order to reach agreement. These conditions and allowances are then referred to Staffing Policy Committee for agreement.

70. The role of Staffing Policy Committee is to determine, monitor and review staffing policies and practices to secure the best use and development of the council's staff. This includes the power to deal with all matters relating to staff terms and conditions.

71. The full remit of the council's Staffing Policy Committee is contained within the constitution.

The publication of and access to information relating to remuneration of chief officers

72. In accordance with the Local Government Transparency Code 2015, the council is committed to publishing the following information relating to senior employees via the council's website:

- Senior employee salaries which are £50,000 and above. This is updated on a monthly basis.
- A list of their responsibilities
- An organisational chart of the staff structure for the top three tiers of the local authority, to include each individual's job title, contact details, grade, salary in a £5,000 bracket, grade maximum and whether each individual is a permanent or temporary employee. This is updated on an annual basis or more frequently if a significant restructure takes place

The publication of and access to information relating to trade union facility time

73. In accordance with the Local Government Transparency Code 2015, the council is committed to publishing the following information relating to trade union facility time as a percentage of the Council's total wage bill via the council's website:

- Basic estimate of spending on unions (calculated as the number of full time equivalent days spent on union duties by authority staff who spent the majority of their time on union duties, multiplied by the average salary)
- Basic estimate of spending on unions as a percentage of the total pay bill (calculated as the number of full-time equivalent days spent on union duties by authority staff who spent the majority of their time on union duties, multiplied by the average salary divided by the total payroll).

The relationship between the basic pay remuneration of chief officers and employees who are not chief officers.

74. In terms of overall remuneration the council's policy is to set different levels of basic pay to reflect the different sizes of jobs, but not to differentiate on other allowances, benefits and payments it makes.

75. The table below shows the relationship between the basic pay of the highest and lowest paid employees in the council, excluding employer and employee pension contributions and non-allowances. The figures include all staff in the council (non-schools) and are based on annual full time equivalent salaries.

	Annual FTE Salary November 2018	Ratio November 2018	Annual FTE Salary November 2019	Ratio November 2019
Highest Paid	£154,290		£157,376	
Lowest paid	£16,394	9.4:1	£17,364	9.1:1

Mean Salary	£27,294	5.7:1	£28,262	5.6:1
Median Salary	£25,463	6.1:1	£26,317	6.0:1

76. The council would not expect the basic pay remuneration of its highest paid employee to exceed 20 times that of the lowest group of employees, excluding apprentices.

77. The apprentice rate of pay varies according to the age and level of apprentice and ranges from £8,493 to £15,839 per annum at the lower levels. The apprentice payrates have not been taken into account when calculating the highest to lowest pay ratios as the apprentice rate of pay reflects the requirement for all apprentices to spend 20% of their working week undertaking learning away from the job, and therefore this is not a viable comparison with other jobs.

78. The current ratio of highest to lowest paid employees is well within the guidelines and is 9.1:1. The trend continues to reduce year on year due to the increases at the bottom of the pay scale in line with the national living wage. The ratios for the mean and median salary levels are also slightly lower than last year at 5.6:1 and 6.0:1 respectively.

Definitions

NJC – National Joint Council

JNC – Joint Negotiating Committee

GLPC – Greater London Provincial Council

SOULBURY staff - Educational improvement professionals. These staff are drawn from different sources, including senior members of the teaching profession. Their role is to advise local authorities and educational institutions on a wide range of professional, organisational, management, curriculum and related children's services issues, with the overall aim of enhancing the quality of education and related services.

Equal Opportunities

This policy has been Equality Impact Assessed to identify opportunities to promote equality and mitigate any negative or adverse impacts on particular groups.

Legislation

Local Government Transparency Code 2015

Equality Act 2010

This policy has been reviewed by the legal team to ensure compliance with the above legislation and our statutory duties.

Further information

There are a number of related policies and procedures that you should be aware of including:

- HAY job evaluation policy and procedure
- GLPC job evaluation policy and procedure
- Market supplements policy and procedure
- Moving home policy and procedure
- Redundancy payments policy
- Overtime policy
- Unsocial hours guidance
- Standby and callout policy
- Starting salaries and incremental progression policy and procedure
- Acting up and additional duties policy and procedure
- The Local Government Transparency Code 2015
- Trade Union Recognition Agreement

These policies are available from the HR department at Wiltshire Council on request.

Policy author	HR Strategic Delivery Team – AG
Policy implemented	28 February 2012
Policy last updated	07 February 2020 (LF)

This page is intentionally left blank

**Extract from the minutes of the Staffing Policy Committee
Dated 8 January 2020**

Pay Policy Statement

The Committee received a report setting out an updated Pay Policy Statement for the financial year 2020/2021 for approval, prior to agreement by Council and publication on the Council's website.

It was reported that under Chapter 8 of the Localism Act 2011 every local authority must prepare a pay policy statement for every financial year. Wiltshire Council originally published its pay policy statement in February 2012 and the updated policy was now required to be published on the Council's website by 1 April 2020.

The policy had been updated to include:

- A revised introduction providing an update on the council's progress with apprenticeships, annual budget and workforce total.
- An amendment to the reference of Corporate Director following the tier 1 restructure and the change in job title to Chief Executive Officer.
- An updated total number of council employees and the latest pay ratios.
- The annual budget will be set in January/February in time for approval at full Council.
- The role of Acting Returning Officer following the tier 1 restructure will be agreed in time for approval at full Council.

The Committee discussed the updated policy and noted the two areas which would need updating prior to the policy being presented to Council.

Resolved:

To approve the draft policy to be presented at Full Council on 25 February 2020, subject to:

- **Updating the current annual budget, and**
- **A decision being made as to which officer would carry out the role of Acting Returning Officer.**

This page is intentionally left blank

Wiltshire Council

Council

25 February 2020

Subject: Adoption of Wiltshire Housing Site Allocations Plan

Cabinet Member: Cllr Toby Sturgis, Cabinet Member for Spatial Planning, Development Management and Investment

Key Decision: Key

Executive Summary

The Wiltshire Housing Site Allocations Plan has been prepared in accordance with the Wiltshire Core Strategy. Its purpose is to bring forward additional housing sites to ensure the delivery of the Core Strategy housing requirement (42,000 homes over the period 2006-2026) and improve supply, as well as reviewing the settlement boundaries as defined on the Council's policies map.

In July 2018, following consideration by Cabinet and approval by Council the Wiltshire Housing Site Allocations Plan was submitted to the Secretary of State for examination by an independent Inspector. Alongside the submission Plan the Council submitted a Schedule of Proposed Changes to it. In line with legislation, the Council specifically requested that the Inspector recommend any main modifications necessary to enable the Plan to be adopted.

The examination including public hearing sessions held during April 2019 has now concluded with the receipt of the Inspector's Report on 23 January 2020. The Report contains the Inspector's assessment of the Plan and has taken into consideration the Council's evidence and all representations received on the Plan during the Summer 2017 consultation and subsequent consultations on proposed modifications to it, as directed by the Inspector, during the examination in 2018 and 2019.

The Inspector's Report concludes that, with the recommended main modifications in the report being made, the Plan satisfies legislative requirements and meets the criteria for soundness in the National Planning Policy Framework. In summary the recommendations relate to: removal of sites at Market Lavington, Hullavington and Crudwell to ensure a consistent approach to site selection and national policy, with particular regard to the role of neighbourhood plans; deletion of Land east of Dene, Warminster due to impacts on heritage assets; inclusion of a new site at The Yard, Salisbury to ensure a consistent approach to site selection; inclusion of specific policies for sites that do not have one; and modifications to site specific policies to ensure effective decision making.

The Inspector has considered the proposed settlement boundaries and is satisfied with the Council's methodology. To ensure the development plan as a whole is effective he considers that the changes proposed in Appendix A of the Plan (as amended by the documents consulted on during the examination) should be made.

The Inspector's Report is final, and the examination is now closed. This leaves the Council with the choice of adopting the Plan, as amended in response to the Inspector's recommendations, or not.

In adopting the Plan, the Council can also make additional modifications to the Plan that do not materially alter its policies including factual updating, correction of typographical errors and consequential alterations to supporting text in the light of the Inspector's main modifications. These are referred to as minor additional modifications.

If adopted by the Council an adoption notice will be published providing a six week period for legal challenge during which any person or organisations may make an application to the High Court on grounds that the document is not within the appropriate power or a procedural requirement has not been complied with.

Upon adoption the Plan will become part of the statutory development plan for Wiltshire alongside the Wiltshire Core Strategy. The authority is legally bound to take planning decisions in accordance with its policies unless there are material considerations which merit setting them aside in any given case.

Proposal(s)

That Council:

- (i) Notes the content of the Inspector's 'Report on the Examination of the Wiltshire Site Allocations Plan' (**Appendix 1**) and his conclusions regarding legal compliance and soundness.
- (ii) Accepts the Main Modifications set out in the Appendix to the Inspector's Report, which the Inspector considers are necessary to make the plan sound in accordance with legislation.
- (iii) Agrees that additional minor modifications are made that arose during the examination or made in the interest of accuracy and consistency, as set out in **Appendix 2**.
- (iv) Adopts the '[Wiltshire Housing Site Allocations Plan Submission draft Plan \(July 2018\)](#)', as amended by the Main Modifications as set out at (ii) above and attached in **Appendix 1** and additional minor modifications as set out in (iii) above and attached in **Appendix 2**, be adopted as part of the development plan for Wiltshire.
- (v) Delegates authority to the Director of Economic Development and Planning in consultation with the Director of Legal, Electoral and

Registration Services and the Cabinet Member for Spatial Planning, Development Management and Investment for: the Policies Map to be amended in line with the Main Modifications as identified in **Appendix 1** and the settlement boundaries, as set out in Appendix A of the 'Wiltshire Housing Site Allocations Plan Submission draft Plan (July 2018) and amended by the proposed changes made during the examination; and further minor textual changes to be made to the Wiltshire Housing Site Allocations Plan prior to publication in the interests of accuracy and consistency.

- (vi) Agrees that the Director of Economic, Development and Planning in consultation with the Director for Legal, Electoral and Registration Services the Cabinet Member for Strategic Planning, Development Management and Investment undertakes the final stages associated with the formal adoption and publication of the Wiltshire Site Allocations Plan.

Reason for Proposal(s)

To progress the adoption and finalisation of the Wiltshire Housing Site Allocations Plan and changes to the settlement boundaries on the Policies Map, in accordance with the commitment made in the Council's Local Development Scheme to prepare the Plan. As the Plan has been found sound by the Inspector with the recommended main modifications, its adoption by the Council would significantly help support the delivery of housing across Wiltshire in line with the Wiltshire Core Strategy and national planning policy.

Once adopted, the Wiltshire Site Allocations Plan will form part of the Council's Policy Framework.

In accordance with the Local Government Acts 1972 and 2000, and the Council's constitution, this report was endorsed by Cabinet on 4 February 2020, and recommended on to Council. The Cabinet report is included below with the Full Council version of the Housing Site Allocations Plan, and updated background documents to include the final Sustainability Appraisal Report and Habitats Regulations Assessment. Minutes of the Cabinet meeting can be accessed [here](#).

Alistair Cunningham
Chief Executive Officer – Place

Wiltshire Council

Cabinet

4 February 2020

Subject: Adoption of Wiltshire Housing Site Allocations Plan

Cabinet Member: Cllr Toby Sturgis, Cabinet Member for Spatial Planning, Development Management and Investment

Key Decision: Key

Purpose of Report

1. To:

- (i) Inform Cabinet of the Inspector's Report on the Examination of the Wiltshire Housing Site Allocations Plan and his conclusions regarding legal compliance and soundness.
- (ii) Seek approval that the Wiltshire Housing Site Allocations Plan, as amended by the recommended Main Modifications in the Inspector's Report and other, minor modifications that have arisen during the examination, or been made in the interest of accuracy and consistency, be recommended to Council for adoption.
- (iii) Seek approval for the Director of Economic Development and Planning, in consultation with the Director for Legal, Electoral and Registration Services and the Cabinet Member for Strategic Planning, Development Management and Investment, to undertake the final stages associated with the formal adoption by the Council of the Wiltshire Housing Site Allocations Plan.

Relevance to the Council's Business Plan

2. Adopting the Wiltshire Housing Site Allocations Plan accords with the overarching aims of the Council's Business Plan 2017-2027 including:

Growing the Economy

- bringing forward housing development where it is needed;
- ensuring the delivery of affordable homes; and
- delivery of new infrastructure to support housing (including contributions to support local schools and GP provision).

Stronger Communities

- providing good access to the countryside through improving green infrastructure connectivity; and

- increasing access to services and facilities through expanding cycling and walking routes.
3. Fundamentally, adopting the WHSAP supports the implementation of the Wiltshire Core Strategy by allocating land to boost the supply of housing in key locations across Wiltshire.

Background

4. On 10 July 2018, following consideration by Cabinet on 3 July 2018, the Council approved the submission of the draft Wiltshire Housing Site Allocations Plan (the Plan) to the Secretary of State to commence the independent examination process. The Plan was accompanied by a Schedule of Proposed Changes that were prepared, where necessary, to address the result of consultation on the Pre-Submission draft Plan published in July 2017 and concerns expressed by Cabinet to delete allocations at Market Lavington and Crudwell, ensure appropriate number of dwellings on site H2.2 'Land off the A303 at White Horse Business Park, Trowbridge' and access to site H2.12 'East of Farrells Field, Yatton Keynell'.
5. In line with legislation (Section 20 (7C), Planning and Compulsory Purchase Act 2004 as amended) and Cabinet resolution in July 2018, officers requested that the Inspector recommends any modifications needed to make the Plan sound.
6. In August 2018, the Council received a procedural letter from the Inspector outlining his initial thoughts on the materials submitted for examination. In response, the Council proposed that the Inspector examine the submitted Plan alongside its Schedule of Proposed Changes. On this basis and in the interests of fairness, the Inspector requested that the Council undertake consultation on the Schedule of Proposed Changes. Consultation was undertaken 27 September to 29 November 2018 and extended for a further period between 11 December to 22 January 2019. All representations received were then submitted to the Inspector for his consideration.
7. The examination in public (the hearing sessions) commenced on 2 April 2019 and ran for seven days. The hearings were structured around a series of agendas set by the Inspector designed to enable him to explore in more detail with the Council and invited participants matters relating to issues of legal compliance and soundness that flowed from the representations submitted on the Pre-Submission Plan, consulted on between 4 July 2017 and 22 September 2017, and the Council's Schedule of Proposed Changes.
8. Following the close of the hearing sessions the Inspector wrote to the Council in 10 June 2019 setting out his preliminary advice about the steps that should be taken to make the Plan sound. In his letter, the Inspector set out a series of Further Main Modifications (FMMs) and advice on consultation, as well as next steps.
9. The FMMs addressed soundness issues raised through the examination, including oral representations from the hearing sessions. Consultation on the

FMMs ran for six weeks from 12 September to 25 October 2019 and all comments received provided to the Inspector for his consideration.

10. The Inspector issued his Report to the Council on 23 January 2020. This is attached at **Appendix 1**.

Main Considerations for the Council

11. The Wiltshire Housing Site Allocations Plan has been prepared in accordance with the Wiltshire Core Strategy. Like the Chippenham Site Allocations Plan (adopted May 2017), its purpose is to bring forward additional housing sites to support the delivery of the Wiltshire Core Strategy housing requirement (42,000 homes over the period 2006-2026) and improve housing supply, as well as reviewing the settlement boundaries as defined on the Council's Policies Map.
12. The Plan is a development plan document. Therefore, once adopted, it will form part of the statutory development plan for Wiltshire and be used in making planning decisions alongside the Wiltshire Core Strategy.
13. The process for the preparation of development plan documents, including the examination stage by an independent Inspector appointed by the Secretary of State, is prescribed by statute and regulation. The scope of the Inspector's Report is set out at paragraph 1 of his report:

"This report contains my assessment of the Wiltshire Housing Site Allocations Plan (WHSAP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the Duty to Co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy."

14. **Appendix 1** to this report provides the Inspector's Report in full. In accordance with legislation the Council asked the Inspector to recommend any Main Modifications necessary to rectify matters that make the Plan unsound or not legally compliant. The recommended Main Modifications (MM) are set out in full as an Appendix to the Inspector's Report. In summary they, as highlighted by the Inspector in his 'Non-Technical Summary', are:
 - The deletion of sites H1.2-H1.4 (80 homes at Market Lavington), H2.11 (50 homes at Crudwell) and H2.13 (50 homes at Hullavington) to ensure a consistent approach to site selection and national policy, with particular regard to the role of Neighbourhood Plans.
 - The deletion of site H2.7 (100 homes at Land East of Dene, Warminster), resulting from concerns about the impacts on heritage assets.

- The inclusion of a new site at The Yard, Salisbury (10 homes) to ensure the Plan has been prepared using a consistent approach to site selection.
- The inclusion of site specific policies for all sites which do not have one. This is to ensure that all requirements of the Plan are clearly expressed and provide an effective basis for decision making.
- The modification of site specific policies to ensure all requirements are clearly expressed in the interests of effectiveness.

15. At paragraph 20 of the Report the Inspector identifies three main issues upon which the soundness of the plan depends, as follows:

- Issue 1: Is the Wiltshire Housing Site Allocations Plan consistent with the Wiltshire Core Strategy? (pages 7 to 10)
- Issue 2: Are the proposed sites justified, effective and consistent with national policy? (pages 10 to 30)
- Issue 3: Are the proposed settlement boundaries justified, effective and consistent with national policy? (pages 30 to 31)

It is against these that the need for the MMs are explained.

16. The Inspector's MMs do not materially alter the overall substance of the Plan, or the findings of the Sustainability Appraisal and Habitats Regulations Assessment both of which have been updated during the examination to support the consultations. They take into account the Council's proposed main modifications to the Plan as set out in the Schedule of Proposed Changes. In overall terms, they have been recommended to strengthen the overall effectiveness of the Plan.

17. With regard to the proposed settlement boundaries the Inspector is satisfied with the Council's methodology. To ensure the development plan as a whole is effective he considers that the changes proposed in Appendix A of the Plan as amended by the documents consulted on during the examination should be made. In line with the Council's methodology, the Council can also periodically include any additional changes to the settlement boundaries by way of factual update to reflect implemented sites on the edge of settlements.

18. The Plan as modified makes provision for the following development:

- East Wiltshire Housing Market Area (HMA):
 - Site for 270 dwellings at Ludgershall
- North and West Wiltshire HMA:
 - 6 sites for a total of 1,050 dwellings at Trowbridge;
 - 2 sites for a total of 100 dwellings at Warminster;
 - Site for 35 dwellings at Chapmanslade;
 - Site for 30 dwellings at Yatton Keynell;
 - Site for 30 dwellings at Bratton

- South Wiltshire HMA:
 - 5 sites for a total of 864 dwellings at Salisbury;
 - 2 sites for a total of 60 dwellings at Durrington.

19. In addition to the Inspector's MMs, **Appendix 2** also provides a list of additional minor modifications which can be identified at the discretion of the Council under the Planning and Compulsory Purchase Act 2004 (as amended), S23 (3(b)). These have been included for completeness and relate to typographical errors or minor factual updates, and consequential alterations to supporting text in the light of the Inspector's MMs. They have been made in the interests of accuracy and clarity and do not affect the overall soundness of the Plan.

20. The text of the Plan as proposed to be adopted has been produced at **Appendix 3**.

21. To support the implementation of the Plan and Wiltshire Core Strategy the Trowbridge Bat Mitigation Supplementary Planning Document has been prepared, which is the subject of a separate Agenda item.

Overview and Scrutiny Engagement

22. There has been no overview and scrutiny engagement.

Safeguarding Implications

23. There are no safeguarding implications arising from the proposal.

Public Health Implications

24. The Plan conforms with the policies of the Wiltshire Core Strategy and the National Planning Policy Framework, as set out in the Inspector's Report. In this regard, the housing site allocations set out within the Plan strike a balance between social, economic and environmental considerations to deliver sustainable development.

25. At the heart of sustainable development is high quality design. Well planned development, including appropriate infrastructure, supports health and well-being of local communities. For example, through the provision of green infrastructure, open space and infrastructure for cycling and walking to encourage active travel. Planning to address the housing needs of communities helps foster social well-being.

Procurement Implications

26. At this stage of the process there are no new procurement implications.

Equalities Impact of the Proposal

27. The Plan aims to positively boost the supply of housing in line with the policies of the Wiltshire Core Strategy and the National Planning Policy Framework. The public consultation processes and community involvement undertaken, including the examination hearing sessions, has ensured that everyone has had the opportunity to inform the preparation of the Plan.
28. The Plan has been subject to Equalities Impact Assessment, as required by Section 149 of the Equalities Act 2010, which was submitted to the Secretary of State as evidence to support the Plan. In addition, paragraph 158 of the Inspector's Report confirms that the Inspector has had due regard to the Act.

Environmental and Climate Change Considerations

29. Planning for development has implications for the natural, economic and social environment of Wiltshire. In line with legislative requirements, the preparation of the Plan has been informed and shaped by Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Habitats Regulations Assessment processes.
30. In his Report, the Inspector has thoroughly examined the Plan in the light of both the process of assessing options undertaken through the Sustainability Appraisal (paragraphs 149 to 154 refers) and Habitats Regulations Assessment (paragraph 155), as well as the findings within these reports. In concluding on legal compliance matters, the Inspector at paragraph 154 and 155 respectively states that "*Overall, I am satisfied that the Sustainability Appraisal (SA) has sufficiently evaluated the reasonable alternatives and is suitably comprehensive, satisfactory and legally compliant*" and is satisfied that the Habitat Regulations Assessment meets the relevant statutory requirements.
31. Paragraph 156 of the Inspector's Report highlights that when considering the development plan as a whole for Wiltshire, including the Plan, that there are policies designed to ensure that the development and use of land contribute to the mitigation and adaptation of climate change. He also acknowledges that the Plan: seeks to identify sites in locations well related to settlements minimising the distance travelled; maximising opportunities to access services by means other than the car; and highlights the need and importance to address potential flood risk.
32. The final Sustainability Appraisal Report and Habitats Regulations Assessment will be prepared for Council and published at the time of adoption in line with legislative requirements.

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

33. If the proposed decision is not taken the Council would fail to meet the obligations it set itself through the Local Development Scheme to prepare the Plan. Government is monitoring the progress of local planning authorities on the performance against their timetables for preparing plans.
34. Once adopted, the Council can give full weight to the Plan in determining planning applications on the allocated sites. In turn, adopting the Plan provides greater certainty to local communities and the development industry on how the development of the allocations will take place.
35. Adoption of the Plan will provide greater certainty in terms of the supply of housing in line with the Wiltshire Core Strategy supporting the Council in maintaining a five- year housing land supply in accordance with the requirements of the National Planning Policy Framework.
36. Rejection of the Inspector's Report and recommendations at this stage would leave the Council reliant on the wider policies in the Wiltshire Core Strategy and the National Planning Policy Framework when considering planning applications across Wiltshire. This may lead to uncertainty and unplanned housing development through speculative applications due to the negative effect on the Council's housing supply. There would also be a reputational risk for the Council in not adopting the Plan, following receipt of the Inspector's Report, which the Council would find difficult to justify to the Ministry of Housing Communities and Local Government.

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

37. See legal implications below. At the point of adoption of the Plan by Council, there will follow a period of six weeks for legal challenge.
38. Identifying land for development can be contentious and there is a reputational risk from those parts of the local community who may have objected to the Plan and do not wish to see development occurring close to where they live or areas they value. While this risk is real the Council is nonetheless charged with making difficult and often controversial decisions in the interests of ensuring it updates its Local Plan and a plan led approach to development.

Financial Implications

39. The financial implications of adopting and publishing the Plan will be met from existing budget allocations for Economic Development and Planning.
40. Adoption of the Plan will help bring forward new sites for housing, thereby enabling the Council to benefit from the Government's New Homes Bonus and by a contribution to the Council's Council Tax base. In addition, they will

be subject to Community Infrastructure Levy that will help deliver infrastructure.

Legal Implications

41. The options open to the Council at this stage in the process are set out in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Development) England Regulations 2012. If the Council rejects one or more of the Inspector's recommended Main Modifications, it cannot then proceed to adopt the Plan. If the Council ultimately resolves to not adopt the Plan it would need to request that it be formally withdrawn.
42. The Inspector considered legal compliance at paragraphs 147 to 158 which confirms the Plan has been prepared in a manner that demonstrates compliance with procedural requirements including: duty to cooperate, Sustainability Appraisal and Habitats Regulations Assessment being undertaken at key stages during the preparation of the Plan, and consultation statements summarising how the Council has engaged with communities and other stakeholders during the process.
43. There are legal implications associated with the adoption of the document. These are limited to the potential for high court challenge. Any such challenge would be limited in terms of scope and could only challenge whether a procedural step in the process of preparing the document has been missed or not complied with fully or the document is not within the appropriate power. Wiltshire Council Legal Services have been involved throughout the process.
44. Should the Plan be formally adopted by Council, an 'Adoption Statement' will be published in the local press covering the area advertising the availability of the Inspector's Report and the adopted Plan. If at this stage anyone wishes to lodge a judicial challenge to the document, they must do so within six weeks of the date it is adopted by the Council.

Workforce Implications

45. There is sufficient workforce to complete the final stage stages involved in adopting the Plan.

Options Considered

46. The options open to the Council are limited by legislation (see legal implications above). The Council can either:
 - (i) Adopt the Plan with the main modifications recommended by the Inspector; or
 - (ii) Resolve not to adopt the Plan.
47. In the case of (ii) the Council would need to reject the Inspector's recommendations and request to the Secretary of State that the Plan is withdrawn and prepare a new one, which would take several years to be put

in place. This would have repercussions for housing land supply paving the way for speculative rather than plan led development.

Conclusions

48. The Wiltshire Housing Site Allocations Plan has been in preparation over a number of years and involved considerable public consultation with the local community and stakeholders. It has reached the final stage in the process.
49. The examination of the Plan has concluded with the Inspector recommending that the Plan is sound, subject to incorporating the Main Modifications recommended in his Report. The Council can now therefore proceed to adopt the Plan.
50. Considering the investment to date in preparing the Plan and the importance of providing for the housing needs of Wiltshire, and demonstrating a five-year housing land supply position, it is proposed that Cabinet endorse the Inspector's Report and recommends that Council adopt the Plan.
51. Once adopted the Plan will form part of the statutory development plan for Wiltshire and have full weight in decision making. It will inform the preparation and determination of planning applications relating to the allocated sites.

Sam Fox (Director - Economic Development and Planning)

Report Authors:

Georgina Clampitt-Dix
Head of Spatial Planning
georgina.clampitt-dix@wiltshire.gov.uk
Tel: 01225 713472

Geoff Winslow
Spatial Planning Manager
Geoff.winslow@wiltshire.gov.uk
Tel: 01225 713414

Date of report: January 2020

Appendices

Appendix 1: Report on the Examination of the Wiltshire Housing Site Allocations Plan (including Appendix of Main Modifications)

Appendix 2: Schedule of Additional Minor Modifications

Appendix 3: Text of proposed adoption version of the Wiltshire Housing Site Allocations Plan (Updated for Council)

Background Papers

Papers to July Cabinet can be viewed via this [link](#)

Papers to July Council can be viewed via this [link](#)

[Schedule of Proposed Changes \(September 2018\)](#)

[Schedule of Further Main Modifications to the draft Wiltshire Housing Site Allocations Plan \(September 2019\)](#)

[Wiltshire Housing Site Allocations Plan webpages](#)

[Wiltshire Housing Site Allocations Habitat Regulations Assessment](#)

[Wiltshire Housing Site Allocations Sustainability Appraisal](#)

This page is intentionally left blank

**Appendix 1. Report on the Examination of the Wiltshire Housing
Site Allocations Plan**



Report to Wiltshire Council

by Steven Lee BA(Hons) MA MRPTI

an Inspector appointed by the Secretary of State

Date 23 January 2020

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Wiltshire Housing Site Allocations Plan

The Plan was submitted for examination on 31 July 2018

The examination hearings were held between 2 April and 16 April 2019

File Ref: PINS/Y3940/429/13

Abbreviations used in this report

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
BBAB-SAC	Bath and Bradford on Avon Special Area of Conservation
CA	Community Area
DtC	Duty to Co-operate
EA	Environment Agency
FRA	Flood Risk Assessment
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
MM	Main Modification
NPPF	National Planning Policy Framework
NE	Natural England
NFDC	New Forest District Council
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area
TBMS	Trowbridge Bat Mitigation Strategy
TA	Transport Assessment
WWSL	Wessex Water Services Ltd
WCS	Wiltshire Core Strategy
WHSAP	Wiltshire Housing Site Allocations Plan

Non-Technical Summary

This report concludes that the Wiltshire Housing Sites Allocations Plan (WHSAP) provides an appropriate basis for the planning of the County, provided that several main modifications [MMs] are made to it. Wiltshire Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

All main modifications are listed in Appendix A. All have been subject to consultation and Sustainability Appraisal (SA). In some cases, I have made amendments to the Council's suggested modifications. These have not materially altered the intent of any policy. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- The deletion of sites H1.2-H1.4, H2.11 and H2.13 to ensure a consistent approach to site selection and national policy, with particular regard to the role of Neighbourhood Plans.
- The deletion of site H2.7, resulting from concerns about the impacts on heritage assets.
- The inclusion of a new site at The Yard, Salisbury to ensure the Plan has been prepared using a consistent approach to site selection.
- The inclusion of site specific policies for all sites which do not have one. This is to ensure that all requirements of the Plan are clearly expressed and provide an effective basis for decision making.
- The modification of site specific policies to ensure all requirements are clearly expressed in the interests of effectiveness.

Introduction

1. This report contains my assessment of the Wiltshire Housing Sites Allocations Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the Duty to Co-operate (DtC). It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The revised National Planning Policy Framework (NPPF) was published in July 2018 and further revised in February 2019. It includes a transitional arrangement in paragraph 214 which indicates that, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Similarly, where the Planning Practice Guidance (PPG) has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the PPG which were extant prior to the publication of the 2018 NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Wiltshire Housing Sites Allocations Plan (WHSAP), submitted in July 2018 is the basis for my examination.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council has requested that I recommend any main modifications [MMs] necessary to rectify matters that make the Plan, as originally submitted for examination in July 2018, unsound or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in Appendix 1.
5. Alongside the Submission Plan (WHSAP.01), the Council submitted a 'Schedule of Proposed Changes' (WHSAP.03). These proposed significant changes to the Plan, including the deletion of some allocated sites, and the allocation of an additional site. On my advice, the Council carried out an additional consultation from September to November 2018. Due to some potential respondents not being notified of this consultation, a further 'targeted' consultation took place between December 2018 and January 2019. This ensured that the consultation as a whole was carried out in accordance with the Statement of Community Involvement (SCI). To all intents and purposes, many of the Proposed Changes were proposed main modifications to the Plan. These Proposed Changes and responses to them were considered through the examination. Where I consider the Proposed Changes are necessary to make the Plan sound, I have recommended them.
6. Following the closure of the hearings, the Council prepared a schedule of 'Further Main Modifications' (FMM), also subject to Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA). These were consulted on between 12 September 2019 and 25 October 2019. Some of these alter in

whole or part the previously consulted on Proposed Changes. The consultation material highlighted where this was the case. As the Proposed Changes had already been consulted on, and discussed at the hearings where necessary and considered by myself, there was no necessity to re-consult on changes already considered. The interests of no party have been prejudiced by this approach.

7. I have taken account of all consultation responses in preparing this report and have made some amendments to the detailed wording of the main modifications. None of the amendments significantly alters the content or intent of the modifications as published for consultation, undermines the participatory processes or SA/HRA that has been undertaken. Where necessary I have highlighted these amendments in the report.
8. The existence of two separate schedules of modifications has the potential to cause some confusion, particularly given that some of the FMMs wholly or partly modify the Proposed Changes consulted on earlier. With this in mind, a single consolidated schedule of main modifications to the Plan, as originally submitted in July 2018, has been prepared. This has resulted in the renumbering of the modifications as originally consulted on but, other than in respect of the detailed wording amendments I have made in the light of consultation comments, their content and effect is unchanged.
9. In adopting the Plan, the Council can also make additional modifications to the Plan so long as they do not, alone or in combination, materially alter the policies of the Plan. Such changes are likely to include minor factual updating and correction of typographical errors etc. The Council consulted on several minor factual updates and consequential alterations to supporting text in its 2018 consultation on Proposed Changes. However, unless identified below, I am satisfied that these alterations to the Plan do not in fact constitute MMs and I have not recommended them as such.

Policies Map

10. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted Development Plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Revisions to Wiltshire Policies Map as set out in WHSAP.28.01-15.
11. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the recommended MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
12. A number of changes to the Policies Map were consulted on alongside the Schedule of Proposed Changes (EXAM.01). Additional changes resulting from the examination were identified as a separate appendix to the consultation on

Further Main Modifications. In this report I identify any amendments that are needed to those further changes in the light of the consultation responses.

13. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed and the further changes published alongside the MMs.

Assessment of Duty to Co-operate

14. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation. The Council is obliged to co-operate with relevant local authorities and other prescribed bodies in relation to 'strategic' matters. These are defined as matters that would have a significant impact on at least two local planning authority areas.
15. The Council has provided statements relating to the DtC (PSCON.13, WHSAP.23). The cross boundary strategic matters which are relevant to this Plan relate mainly to the individual and cumulative impacts on the strategic road network, flooding and on biodiversity assets. The statements identify other important issues, such as the effect of development on the setting of Salisbury Cathedral. It is debatable whether some of these would constitute 'strategic matters' as defined in the Act. Nevertheless, there is evidence of long-term engagement with relevant prescribed bodies and neighbouring authorities on all of these issues.
16. While the extent and regularity of this engagement differs across organisations, I am satisfied that what has been carried out is relevant and appropriate to the scope of the Plan and its likely effects. The engagement has culminated in a range of agreed mitigation measures to address the impacts of development and/or Statements of Common Ground (SoCG) with prescribed bodies. This demonstrates on-going engagement with relevant bodies and a commitment to addressing relevant strategic matters.
17. Matters relating to meeting unmet housing needs from neighbouring authorities are outside the scope of the WHSAP and do not constitute a failure of the DtC. Other areas of concern raised are more related to general matters of engagement than any failure to comply with the DtC.
18. Overall, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the WHSAP and that the DtC contained in Section 33A of the 2004 Act has therefore been met.

Assessment of Soundness

Background

19. The WHSAP has been prepared in the context of the Wiltshire Core Strategy (WCS) which was adopted in January 2015. The WCS sets out the overall vision and spatial strategy for the County up to 2026. It contains strategic policies which define the quantum and distribution of growth within the three

defined Housing Market Areas (HMAs) within the County and the hierarchy of settlements where development is expected to take place.

20. As set out in Section 3 of the Plan, the WHSAP has three objectives. The first relates to ensuring there is a clear definition of the extent of built-up areas through a settlement boundary review. This is dealt with under Issue 3. The second objective is to help demonstrate a rolling five-year supply of deliverable land for housing development. The third is to allocate sites at the settlements in the County that support the spatial strategy of the WCS.

Main Issues

21. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified three main issues upon which the soundness of this Plan depends. Under these headings my report deals mainly with matters of soundness and does not respond to every point raised by representors.

Issue 1 – Is the WHSAP consistent with the Wiltshire Core Strategy?

22. Firstly, paragraph 184 of the NPPF states that local planning authorities should set out clearly their strategic policies for the area. This provides clarity with regard to the preparation of Neighbourhood Plans. The WHSAP is silent on this matter. The Council has determined that all allocations in the WHSAP should be strategic in nature. Insofar as all allocations are deemed necessary to support the WCS, and where there are no other means of meeting these objectives, then such an approach is justified. To be consistent with national policy, a main modification is therefore necessary to address this omission (**MM1**).
23. The WCS establishes a housing strategy based on an overall requirement of at least 42,000 dwellings between 2006 and 2026. This is split into three HMAs. This translates to a requirement of 5,940 in the East Wiltshire HMA (EW), 24,740 in the North & West Wiltshire HMA (N&WW) and 10,420 in the South Wiltshire HMA (SW). Taking account of completions and commitments, at the time of the examination hearings, the Council's evidence indicated a residual requirement in each HMA as follows;
 - 5 dwellings in EW;
 - 1109 dwellings in N&WW; and
 - 1331 dwellings in SW.
24. The WCS states that HMAs are the most appropriate scale at which to disaggregate housing. The HMA figures are also the basis of which any assessment of housing land supply will be assessed. In addition to these figures, the WCS also sets out a range of 'indicative' requirements for each 'Community Area' (CA) the Plan identifies. The WCS states that these figures are not meant to be prescriptive or inflexible, but that they should be considered material in defining the strategy for distribution of housing – including any assessment through subsequent plans such as the WHSAP. The indicative requirements for the CA therefore provide an important

consideration in determining the scope of the Plan and the distribution of sites across the area. However, in determining the overall consistency with the WCS, the HMA requirements take precedence.

25. When recommended main modifications on individual sites are taken into account, the WHSAP would contribute the following number of dwellings during the plan period:
 - 161 in EW;
 - 1233 in N&WW; and
 - 684 in SW.
26. This level of supply is likely to be supplemented by windfalls. There is good evidence that windfalls have been a substantial part of the housing land supply and will continue to be so. This stance was also taken by the WCS Inspector. The Council's submitted windfall estimates are based on a different methodology to that which the WCS Inspector considered appropriate. The figures produced by this, which were more optimistic, were disputed at the hearings. The Council produced a paper (EXAM.17) which compared the 'accepted' approach with their preferred approach and a third 'amended' approach.
27. This provided a range of windfall figures for each HMA. These were between 314 and 823 for East Wiltshire, 1514 and 2209 for N&WW and between 587 and 743 for SW over the remainder of the plan period. Overall, windfalls are expected to account for between 2415 and 3775 dwellings. The lowest figure for all three is derived from the WCS methodology, the highest is from the Council's revised methodology. Whatever figure is selected, this represents a significant proportion of the overall supply. This creates a degree of uncertainty and risk. Indeed, the amount of housing expected through windfall exceeds what is being allocated in this Plan. Nevertheless, there is good evidence that windfalls have been a constant source of supply during the plan period and there is compelling evidence that this will continue into the future. The WCS provides scope for this type of development and I see no reason to consider the WHSAP to be unsound on this basis.
28. EXAM.17 explains the rationale for the three different assessments of windfall. The higher figure is based on the assessment of large site windfalls over the plan period as a whole, rather than just the first five years. There is evidence of a steady supply of large site windfalls coming forward and there is no reason why these should not be included as part of the long-term assessment of provision. The figures produced are in my view based on a robust assessment and provide some comfort over the likely level of delivery.
29. Based on the supply figures set out in TOP.03C, the WHSAP would result in a small surplus in both EW and N&WW. This would be supplemented by windfalls to provide a degree of flexibility and comfort over delivery. This level of 'over supply' would not be significant or lead to any particular inconsistency with the WCS.
30. The situation in SW is different. Even with allocations, there would still be a shortfall of around 647 dwellings. The Council is essentially relying on

windfalls to make-up the shortfall. Depending on which windfall figure is used, and assuming all other commitments come forward as expected, there would either be a deficit of around 60 dwellings or a small surplus of 96 dwellings. I acknowledge that the Council's approach results in a degree of risk in terms of both meeting the overall HMA requirement and ensuring there is a five-year supply of deliverable housing land.

31. However, there are a number of reasons why, in the circumstances and context of this Plan, it is not necessary for additional housing sites to be allocated in this Plan in order for it to be sound. Firstly, any deficit is unlikely to be significant in the context of the overall housing requirement of the WCS or for the SW HMA. Secondly, and importantly, the Council is also in the process of carrying out a review of its Local Plan. This is due to be adopted in 2021. This review provides the Council with the opportunity to consider the need for additional sites, as well as assessing the scale of development required in the light of current national policy and its distribution across the County. I am also conscious of the requirement for Local Plans to be reviewed every five years and the relative age of the WCS.
32. In this context there would be little to be gained by further delaying adoption of this Plan, prolonging the uncertainty around the sites that are already allocated, particularly in EW and N&WW, and delaying the actual delivery of housing. The WHSAP provides additional housing supply and certainty with regard to allocated sites. In this context, the WHSAP is fulfilling its objectives of helping to meet the five-year supply and supporting the spatial strategy set out in the WCS.
33. At the CA level, the WHSAP would not result in an exact 'match' between the indicative requirements for each area and the planned supply. In some areas, there would still be a shortfall, while in others there will be a surplus. This is mainly as a result of development outside the scope of the Plan. Some of the shortfalls are material, particularly in Trowbridge and Salisbury. However, the WCS is clear that these figures are indicative only. It is not absolutely necessary for indicative requirements to be met for the Plan to be consistent with the WCS spatial strategy. The CA figures are helpful in guiding where the Plan should look to 'intervene' and indicating where the most appropriate locations are for development. In this regard, the distribution of development in the WHSAP still supports the strategy in the WCS, particularly in relation to the focus of development on Trowbridge and Salisbury. Where shortfalls do exist in individual CAs, this is unlikely to result in any particular impact on overall supply or delivery. This is particularly the case when considering the level of delivery proposed at the HMA level and across the County as a whole. For the Plan to be sound it is not therefore necessary to allocate additional sites within these locations.
34. It is also unnecessary to seek to meet shortfalls in one CA by increasing growth in another. For example, Salisbury and Trowbridge have been identified as sustainable locations for growth. Redistributing any 'shortfall' from these locations to other areas through the WHSAP would not necessarily result in a sustainable or WCS compliant strategy. This would, in effect, be re-drafting the broad distribution strategy, which is outside the scope of this Plan. In any event, this redistribution has already taken place to an extent, with some CAs receiving higher numbers of new dwellings than originally expected

through windfall development and/or Neighbourhood Plans. This also provides some comfort that the WHSAP would not be seen as a barrier to housing delivery or WCS compliant development taking place elsewhere. Again, in the context of the Local Plan review taking place, delaying the adoption of this Plan to address such issues would also not be justified.

35. Overall, I am satisfied that the WHSAP makes adequate provision to meet housing requirements and is consistent with the strategy set out in the WCS.

Issue 2 - Are the proposed sites justified, effective and consistent with national policy?

Sites – General Issues

36. The general process of site selection involved multiple stages of assessment, as set out in the Site Selection Process Methodology (TOP.02). The Council established at an early stage that the WHSAP would only seek to 'intervene' where it considered it necessary to do so. The initial 'screening' stage focussed on CAs where the Council identified a need for the WHSAP to 'intervene'. Areas where the indicative needs of the CA were already met were excluded from further consideration. While the WCS does not necessarily preclude additional development in these locations, narrowing the scope of search to those areas where there is a so-called 'strategic imperative' to intervene is not an unreasonable approach. In this way, the WHSAP is clearly seeking to support the spatial strategy of the WCS.
37. The second stage of the 'sifting' process involved considering constraints to development as identified in the Strategic Housing Land Availability Assessment (SHLAA) and WCS. Locations considered unsuitable for development were screened out at this stage. Locations where the Council considered there to be no need to intervene were also excluded at this stage. In line with the WCS, sites in some 'Large Villages' and 'Local Service Centres', where indicative needs were already met, or where Neighbourhood Plans were able to address local housing needs, were also excluded at this stage. However, not all Local Service Centres or Large Villages were excluded where the Council considered a need exists. Sites in 'Small Villages' were not considered as the WCS limits growth in these locations to infill only. Narrowing the scope of the Plan through stages 1 and 2 is a reasonable approach.
38. Remaining sites were then considered through the SA. Sites with major adverse effects and no satisfactory mitigation were rejected at this stage. Remaining sites were identified as 'preferred sites' and taken forward to more detailed assessment. Sites considered suitable after this assessment have been included in the Plan. The process has been thorough, and all sites have been considered on a consistent basis. Disputes about the Council's approach and findings are to be expected. These are due to differences in planning judgement and do not undermine the site selection process undertaken. I am therefore satisfied that this followed a reasonable and logical rationale in the context of the WCS and the purpose of the WHSAP.
39. Concerns have been raised that the WHSAP primarily identifies sites outside defined settlement boundaries and that this is contrary to WCS Core Policy 2.

This states that development will not be permitted outside defined settlement boundaries, except in relation to certain 'exception' policies. However, other parts of that policy, and the delivery strategy more generally, highlight the likelihood that additional housing land might be identified through subsequent plans such as the WHSAP or Neighbourhood Plans. There is nothing to suggest that all allocations in these plans would be within settlement boundaries. Moreover, the evidence does not support the idea that all housing needs could be realistically met within settlement boundaries. The WCS makes provision for this. It would not therefore be logical or practical to conclude the allocations in the WHSAP are unsound on this basis. The Development Plan should be read as a whole. In doing so, I consider it reasonably clear that Core Policy 2 does not preclude the Council from considering additional allocations outside settlement boundaries. The allocated sites are therefore not unsound on this basis.

40. Only sites H1.1, H2.1, H2.7, H2.11 and H3.1 are subject to specific policies. The remainder are addressed under general policies H1, H2 and H3. The supporting text for sites without specific policies often sets out detailed requirements or constraints that would affect the determination of any planning application. Reliance on supporting text in these circumstances would generally not form an effective means of decision making on individual applications and would be unsound. To address this, main modifications are needed to elevate much of the supporting text to policy. While in many cases this will not alter the intent of the Plan, it will ensure the Council has a clear and effective basis on which to determine applications.
41. Policies H1, H2 and H3 provide little in the way of guidance for how decision makers should react to a proposal. They are neither effective policies for the determination of planning applications for each site, nor are they consistent with paragraph 154 of the NPPF. This states that only policies that provide a clear indication of how a decision maker should react to a development should be included in the Plan. Subject to other main modifications, these policies would no longer serve any purpose. They should therefore be deleted and redrafted as supporting text (**MM12, MM21, MM96**).
42. The allocations in the WHSAP are predominantly greenfield sites on the edge of existing settlements. There will be an inevitable degree of encroachment into the open countryside and an urbanisation of existing open and undeveloped land. This is likely to result in some degree of harm to the existing character and appearance of each affected area. Nevertheless, in ensuring there is a continuing supply of housing in the area to complement that coming forward through the WCS, Neighbourhood Plans and windfall, there is a need to identify greenfield sites. The allocations are therefore sound in this regard.
43. The evidence base for the Plan and site selection process has identified a number of constraints and issues for each site that any development would need to address. A number of these apply to multiple sites. To avoid repetition, I shall address a number of these below.
44. Issues relating to biodiversity affect a number of sites across the County. Of particular note are potential impacts on the Bath and Bradford on Avon Bats Special Area of Conservation (BBAB-SAC). All sites in Trowbridge (H2.1-H2.6)

and land at Barters Farm (H2.10) have the potential to cause harm to bats. However, provided potential impacts can be avoided or adequately mitigated, then development need not be ruled out in principle. The HRA confirms that with appropriate mitigation in place, the development proposed in the WHSAP would be unlikely to lead to adverse impacts on the integrity of the BBAB-SAC. Mitigation would however be needed to address both the potential loss and/or deterioration of habitat and recreational pressures. The HRA recommends measures relating to the retention of trees and hedgerows, the provision of wide landscape buffers and landscaping and contributions to measures that will be outlined in the Trowbridge Bat Mitigation Strategy (TBMS).

45. Work is continuing on the TBMS, with the intention that it will be adopted by the Council as a Supplementary Planning Document (SPD). A draft was consulted on in February 2019. The aim of the document is to provide a detailed approach to considering the individual and cumulative impacts of development in Trowbridge. While this document is outside the scope of the examination, I am satisfied that it is being prepared in a robust fashion with the input of Natural England. There is a reasonable degree of comfort that the TBMS will therefore become a useful tool in helping to guide the particulars of any development. I have noted concerns that the TBMS is not yet finalised. Nevertheless, the Plan will make it clear that impact assessments will be required which will identify mitigation measures and the supporting text outlines the types of measures that might be expected. The Council will still therefore be able to require appropriate mitigation.
46. The TBMS does not need to be in place to determine sites are acceptable in principle. Moreover, the TBMS is not needed in order for the Council to assess the impact of development or for developers to understand what is expected of them. With or without the TBMS in place, developers will still need to demonstrate that their specific proposals will not result in unacceptable harm. The Plan already alludes to various measures, including relating to layout, landscape buffer zones, retention of mature landscaping, lighting and the need to make financial contributions toward off-site mitigation and monitoring. This is likely to include the creation of Suitable Alternative Natural Green Space(s) (SANG) and monitoring regimes. It is unlikely that all strategic off-site mitigation measures identified by the TBMS would be in place prior to the delivery of some of the housing. Nevertheless, I am satisfied that this is not an impediment to development coming forward on affected sites and that in the long term, such mitigation will be effective. Furthermore, the types of on-site measures identified provide a suitable basis on which proposals can come forward.
47. Modifications will however be needed to give greater clarity on what is likely to be required and to ensure a consistency of approach. As highlighted above, modifications are also required to elevate requirements relating to bats into policy and ensure guidance is clear and consistent. Some of the existing supporting text relating to bats is very specific, particularly with such things as the width of landscape buffer zones. There are risks that this might conflict with the final TBMS or not be the most appropriate solution for an individual site. Being inflexible in this regard might have unintended consequences in terms of ensuring the mitigation proposed is the most appropriate for the site in question. I have therefore recommended modifications to remove this level of specificity and allow some flexibility. Rather than weakening the controls,

this will allow the developers to identify bespoke proposals that are best suited to each site. This would also allow the Council to assess each mitigation scheme on its merits.

48. Sites in Salisbury, Warminster and Durrington have been identified as having potential risks associated with impacts on the River Avon Special Area of Conservation (SAC), particularly in relation to phosphates. The HRA concludes that development in these areas will need to demonstrate they will be phosphate neutral in order to ensure there will be no adverse effect on the integrity of the SAC. A 'Memorandum of Understanding' has been entered into by the Environment Agency (EA), Natural England (NE), New Forest District Council (NFDC), New Forest National Park Authority (NFNPA), Wessex Water Services Ltd (WWSL) and Wiltshire Council. An Interim Delivery Plan for Phosphate Neutral Development was published in January 2019. This sets out the types of mitigation measures that could be implemented to achieve this aim. Those that are identified as potential on-site measures are not unusual. For example, measures relating to green infrastructure, sustainable drainage, water efficiency and sewerage can all serve to mitigate any potential risks.
49. There is also a SoCG (SoCG26) between the same parties. These also describe the on- and off-site measures that will be required to ensure phosphate neutrality. The assessment of risk is robust and the protection of the River Avon SAC can be achieved without undue risk to the delivery of sites. Modifications are still necessary to ensure new site policies, where relevant, highlight the requirement for measures to protect the integrity of the River Avon SAC. Modifications to relevant supporting text are also necessary in the interests of clarity. These will ensure that developers are fully aware of their responsibilities with regard to the protection of the SAC and the Council is able to assess any impacts. Alongside relevant existing WCS policies, when modified the WHSAP should not lead to adverse effects on the integrity of the River Avon SAC.
50. The issue of flood risk was also assessed through the site analysis undertaken. The outcome of this is that the majority of sites are wholly in Flood Zone 1. Sites H2.4, H2.5, H2.6 and H2.9 are partially within Flood Zone 2 or 3. Nevertheless, it has been established that residential development need not intrude into affected parts of any site. These areas are included in the site boundaries to facilitate delivery or provide scope for mitigation measures only. In these cases, flooding issues can be dealt with on a site-by-site basis and there is no clear evidence to suggest development on these, or any other allocated site, would result in undue risk to the new dwellings or increased risk of flooding elsewhere.
51. The overall approach taken is therefore consistent with the sequential, risk-based approach in national policy. The Environment Agency has also raised no objections on this basis. However, owing to the scale of most sites, or their proximity to water courses, there will still be a need to demonstrate compliance with WCS and national policy on flooding. Modifications are therefore necessary to highlight the need for flood risk assessment and to provide certainty and consistency about what will be expected.
52. Clearly, the development proposed in the WHSAP will result in an increase in traffic, particularly in Trowbridge and Salisbury. There is evidence to suggest

that some locations in both settlements are subject to existing traffic problems. This is not unusual in large towns and cities. There are Transport Strategies in place for both Trowbridge (WHSAP.07) and Salisbury (WHSAP.08/08A). These identify the problems and outline potential mitigation measures. Subject to appropriate mitigation taking place, neither these documents, nor any other elements of the evidence base, conclude that the development proposed in the WHSAP would individually, or cumulatively with other development, result in severe transport problems. Importantly, neither the Highway Authority nor Highways England have raised any objections to the principle of development identified in the WHSAP.

53. Where necessary, the supporting text and/or policies of the Plan identify the need for measures to address the impacts of development, including new access links and improvements to existing junctions or improvements to support walking and cycling. This will usually be based on the provision of a Transport Assessment (TA) to assess the scale of any impact and suggest mitigation measures. This is not unusual. There is no clear evidence therefore that any site should be considered unsound in principle on the basis of transport impacts. This does not negate the need for such issues to be considered on a case-by-case basis, but there is adequate evidence in place to give comfort that appropriate solutions can be found to minimise the effect of development. There are instances where the Plan would be more effective if specific reference to where Transport Assessments will be expected to focus and/or where improvements will be required.
54. There is an inconsistent and sometimes unclear approach to how references to the need for infrastructure contributions are made. In places, it is implied that what is being required would go beyond the normal approach as set out in the WCS. This is not justified. A number of main modifications are therefore needed to ensure the approach is clear, consistent, justified and effective with regard to any obligations.
55. The Council has had regard to all of the above constraints in the selection of sites. Other than where specifically referred to below, I am satisfied that there is a reasonable prospect of development being able to take place without unacceptable harm. This will clearly be dependent on the nature of any proposals put forward by developers. However, these constraints are not enough to render sites unsound in principle. This does not negate the need to assess proposals on their merits and there will clearly be a need for developers to come forward with well-designed and sensitive proposals that have proper regard to the character and context of every site. The main modifications will ensure the Council has an effective means of ensuring this.
56. Main modifications **MM9, MM10, MM11** and **MM22, MM68, MM69, MM97, MM120, MM121** are necessary to address the issues raised above. Others are identified within the main modifications for individual sites where other changes are also necessary.

Sites – Specific

57. The soundness of individual sites is considered below. Where an issue is not referred to specifically then, subject to any modifications referred to in

paragraphs 36-55, it can be taken that in all other matters the site is suitable to be allocated.

East Wiltshire Housing Market Area

Tidworth Community Area

58. Land at Empress Way (H1.1), Ludgershall is identified for the development of around 270 dwellings. Part of the site is already subject to a planning permission. The lack of natural boundaries to the south can be addressed through sensitive design and layout. Development would extend no further south than development under construction to the west. In this way, it would integrate well with its surroundings.
59. The WCS identifies Ludgershall as a Market Town, and thus having potential for growth. The site itself is adjacent to an area of existing development and relatively well related to facilities in Ludgershall and public transport. The potential for improving accessibility is recognised in the policy. There are no insurmountable constraints to impede delivery and thus the site is sound in principle.
60. The policy and supporting text relating to the land for a primary school is unclear and modifications are necessary to give guidance on where in the site the land should be identified. The evidence does not support the holding of land for a primary school in perpetuity. Modifications are therefore necessary to make this clear.
61. There is nothing to suggest the proximity to a sewerage treatment plant is an impediment to development in principle. However, an odour assessment will still be needed to help guide layout and ensure a satisfactory living environment can be created. To ensure clarity, the policy and supporting text should also include reference to various requirements, including the need for a Transport Assessment (TA) and the specific assessment of trigger points for delivery of an access via Simonds Road, a flood risk assessment (FRA) and measures relating to design and layout. Main modifications to both policy and supporting text are needed to address all of these points and ensure effectiveness (**MM13 – MM16**).
62. The scope of the WHSAP established that the Council would generally not intervene at a local level where a Neighbourhood Plan was 'sufficiently progressed'. TOP.02 states that Neighbourhood Plans would only be considered 'sufficiently progressed' if they had reached Regulation 16 stage. The Market Lavington Neighbourhood Plan was not at this stage at the time of the examination hearings. Nevertheless, significant progress has been made and there is a reasonable likelihood that it will progress to examination and referendum. The most recent version of the Neighbourhood Plan, which has been subject to consultation, includes H1.3 and H1.4 but not H1.2.
63. There is a clear intent for the Market Lavington Neighbourhood Plan to allocate sites to meet local needs. This is consistent with the WCS in relation to Local Service Centres. In this context, the Council no longer considers any intervention to be necessary. The Neighbourhood Plan is therefore capable of meeting local needs. In addition, the scale or complexity of the development here is not such that a strategic allocation is necessarily required. Moreover,

other Neighbourhood Plans are in preparation elsewhere in the CA, such as West Lavington, which could contribute to meeting housing needs in the CA. Any resulting shortfall against the indicative CA requirement would not be significant. Deletion of these sites from the WHSAP would not have a materially harmful impact on housing delivery in the area.

64. In this context, to continue to allocate sites in the WHSAP for this area would be contrary to the aims of national policy, in particular paragraph 184 of the NPPF, which aims to give communities direct power to deliver the sustainable development they need. I therefore find that allocations H1.2-H1.4 are unsound and should be deleted from the Plan, with consequential changes to housing numbers and supporting text (**MM2, MM4, MM12, MM17-MM20**).

North and West Wiltshire HMA

Trowbridge Sites – General Issues

65. The spatial strategy for Wiltshire set out in the WCS identifies Trowbridge as a Principal Settlement and a focus for growth. The WCS establishes an indicative requirement of 6,810 dwellings, of which 1,649 were still to be identified outside the WCS. Revised expectations over the delivery of WCS allocations increased the residual needed to meet the indicative requirement to around 2,230. Even with the allocations in the WHSAP, the indicative requirement will not be achieved. For reasons given elsewhere, I do not consider it necessary for the Council to identify additional sites to meet this shortfall. However, to support the spatial strategy, and ensure a continuing supply of sustainable housing, it is still appropriate and necessary for the WHSAP to identify additional growth in this location.
66. The sites identified all constitute urban extensions. The WHSAP allocates six sites around the edge of the existing built-up area that would provide about 800 additional dwellings. Main modifications discussed below will increase this to 1,050. With appropriate mitigation in place, there is no clear evidence to suggest that the cumulative impact of these allocations, along with other growth planned for the areas, would be severe in relation to highways, local services and facilities or biodiversity. As well as specific modifications described for each site, consequential changes to housing numbers will have to be reflected in the Plan (**MM6, MM8**).
67. WCS Policy 29 states that an additional 950 dwellings only will be allowed to be developed once improved secondary school has been provided. The sites in the WHSAP are not subject to any phasing in relation to secondary school provision. Concerns have been raised over consistency with the WCS in this regard and ensuring sufficient school places exist. I am satisfied, however, that in seeking to ensure a continuing housing supply in Trowbridge, the growth envisaged would not result in unacceptable issues with school places in the medium to long-term. While delivery of the strategic allocation, and associated secondary school provision at Ashton Park, is slower than expected, there remains a reasonable degree of comfort that additional secondary school provision will be coming forward. The WHSAP and WCS also both include provision for funding contributions where necessary to provide for school improvements. Adequate provision is therefore in place for secondary school education.

68. The WHSAP makes provision for a new primary school on Elm Grove Farm (H2.1). The latest evidence suggests that a new school is no longer necessary and additional school places can be achieved in other ways. Again, with appropriate contributions toward primary school provision being made in line with WCS policy, there is no reason to conclude that there will be insufficient primary school places to meet the needs generated by development. Overall, the Plan is sound in this regard. Modifications are however needed to the supporting text to reflect the changes in circumstances in the town (**MM23**), in the interests of a justified plan.
69. Site H2.4 (Church Lane), H2.5 (Upper Studley) and H2.6 (Southwick Court) are closely related to each other and the Southwick Country Park. While all these are likely to come forward independently of each other, their close physical relationship could have particular implications, particularly for heritage, landscape, biodiversity and highway access if they do not take account of each other in terms of layout and the provision of mitigation measures. To be effective, each policy should make it clear that regard must be had to development taking place in other sites. Furthermore, both individual and cumulative effects on the Country Park must be taken into account.
70. This approach should not prejudice the delivery of each site. The recommended modifications make it clear that mitigation measures must be considered on a comprehensive and consistent basis. All this is likely to mean in practice is that schemes coming forward must have regard to other proposals in the development pipeline and ensure they are not mutually exclusive or prejudicial to each other.
71. Sites H2.1, H2.2, H2.3 and H2.6 are affected to one extent or another by the North Bradley and Hilperton Neighbourhood Plans. The North Bradley Plan is in preparation, whereas the Hilperton Plan is made. Trowbridge is identified as a Principal Settlement in the WCS and a focus for strategic growth. It is justifiable therefore for the WHSAP to identify land for growth. The scale of requirements for Trowbridge goes beyond what is likely to be identified in these Neighbourhood Plans. The cumulative scale, complexity and significance of the development – and the importance it has for delivering the WCS – justifies strategic allocations. Both Neighbourhood Plans also reflect the Council's intention to bring forward development in the locations identified in the WHSAP. The allocations are therefore sound in this regard.

Trowbridge – Site Specifics

72. Land at Elm Grove Farm (H2.1) is identified for 200 dwellings. While development would extend development into an open and undeveloped area, the site is largely contained by railway lines to the east and an industrial estate to the south-east. The site is in a relatively accessible location on the edge of the town and is suitable in principle. However, the removal of the school requirement provides some additional scope for development and the approximate capacity figure of 200 is no longer justified. The Council's revised assessment of 250 units is more appropriate and justified figure to use. Modifications to the policy and consequential changes to the housing numbers are therefore necessary.

73. The policy identifies the need for junction improvements, a new through road and improvements relating to walking and cycling. This should be sufficient to address any potential transport impacts. The supporting text already identifies the presence nearby of Grade II Listed Drynham Lane Farmhouse and the potential for archaeological remains on the site. The Grade II Listed Southview Farmhouse could also be affected by development of the site and thus should be referred to in the supporting text. These factors do not mean that development cannot proceed in principle, though clearly any proposal would have to have due regard to the setting of these assets. To be effective, the policy should identify these constraints.
74. While there is no longer any need for Policy H2.1 to safeguard land for a school, the policy still requires improvements to the existing Queen Elizabeth II field. This is justifiable, but it is necessary for the field to form part of the overall site. Figure 5.5 and the policies map should be amended to reflect this. Although sound in principle, modifications are therefore necessary, as described above, to ensure the policy is justified and effective (**MM24-MM31**).
75. Land off the A363 at White Horse Business Park (H2.2) is located to the west of the existing business park in the open countryside between the town and the village of North Bradley. The supporting text highlights several constraints that must be addressed, including the need to ensure development does not coalesce with North Bradley, that existing landscape features are retained, issues relating to bats, and the need to provide high quality development in what is a gateway site to the town. These are all justified and appropriate requirements.
76. The site contains heritage assets that could be affected by development. There is scope within the site to ensure a satisfactory form of development can take place which need not result in unacceptable harm to the setting of these assets. Nevertheless, they should be referred to in both policy and supporting text in the interests of clarity and effectiveness. The recommended main modifications highlight the particular importance of the Baptist Burial Ground. Seeking to enhance the setting of this asset does not conflict with national policy and reflects the nature of the site and the potential for development to facilitate improvements.
77. The Plan is currently silent on highway access. Safe and suitable access to the site could be achieved from the A363. Reference to this in policy would provide a degree of clarity. The need for any additional points of access could be considered as part of the comprehensive masterplanning of the site. The policy as modified does not preclude this. However, considering the constraints that exist, there is insufficient evidence to justify identifying a second access as a requirement of the policy.
78. The figure of 150 units does not reflect the most recent assessment of the site's capacity. In considering the site's heritage, biodiversity and layout constraints, a precautionary approach suggests modification to increase capacity to 175 would be justified. Provided that constraints can be addressed, this would not necessarily preclude additional dwellings coming forward through a comprehensive masterplan. Nevertheless, setting a figure too high in the Plan could result in undue pressure on heritage and biodiversity

assets. The site boundary does not reflect the accurate developable area. Accordingly, the policies map should be amended to ensure accuracy.

79. The site is in multiple ownerships. Considering the nature of the site, and the features it contains, it is reasonable for the policy to seek to ensure a comprehensive approach to development through some form of masterplan. It will be for the Council to determine the level of information it needs to provide sufficient comfort that the overall development will not result in harm and there is no reason this requirement should prejudice development. It should not be unduly difficult for developers of neighbouring plots to liaise with each other, and the Council, in preparing acceptable schemes. This also applies to other sites where similar requirements are in place.
80. The principle of development in this location is therefore sound. However, main modifications **MM32-MM39** are necessary to ensure site H2.2 is justified, consistent with national policy and effective.
81. Land adjacent to Elizabeth Way (H2.3) is allocated for 205 dwellings. This takes up land on what is known as the Hilperton Gap between the recently built Elizabeth Way distributor road and the edge of Trowbridge. While the development would result in an obvious narrowing of the 'gap' between settlements, the road is already a large and highly visible physical feature running through the gap. This constitutes a discernible degree of encroachment in the countryside and change in the character of the area. Development to the west of the road would still be well related to the edge of Trowbridge while ensuring that coalescence with Hilperton would not take place. Development here would therefore be a logical location for an urban extension.
82. Although the layout of development will be guided by constraints, there is no reason why new housing would need to appear disconnected or separate to Trowbridge. The supporting text sets out several necessary and justified requirements relating to design, layout, biodiversity, accessibility improvements and the protection of heritage assets. When given the status of policy, these requirements will provide an effective framework for determining applications and ensuring an appropriate form of development is delivered.
83. Now the road is complete, the site boundary no longer reflects the developable extent of the site. A small portion of the identified site also takes in an area of undeliverable garden space. This does not affect the delivery of the site as a whole, but the policies map should be amended to reflect this. The change to the extent of the site results in a larger area for development. This, coupled with an overly pessimistic view of capacity, means that the figure of 205 dwellings is not justified. A figure of 355 would be a more realistic assessment. Modifications **MM40-M47** are necessary to ensure the Plan is justified and effective.
84. Land at Church Lane (H2.4) is allocated for 45 dwellings. The site is made up of open fields between the edge of the settlement and the Lambrook Stream. These are recognised constraints relating to heritage, biodiversity and drainage. There is nothing to suggest that these would prejudice a high quality form of development in the northern part of the site. Any impact on these assets can be assessed by the Council at the time of an application. The

site would result in a relatively small and logical extension to an existing residential area. The principle of development here is sound.

85. Access from Frome Road is acceptable in principle, but alterations to create this access could have some effect on listed buildings. The policy for the site should therefore highlight the need for measures to minimise any associated paraphernalia. The supporting text should also make clear that development should avoid the paddock to the rear of the listed buildings. This will provide developers with necessary clarity and certainty over the scope of development.
86. To ensure effectiveness in relation to biodiversity and drainage mitigation, the site area should be extended to the stream. This will require consequential changes to the policies map. To provide certainty, the policy also needs to be explicit about expectations in design, layout and the relationship between development and heritage assets. While the allocation is acceptable in principle, main modifications **MM48-MM55** are necessary to ensure the Plan is effective and consistent with national policy.
87. Land at Upper Studley (H2.5) has been allocated for around 20 dwellings. Subject to appropriate mitigations relating to issues of design quality, biodiversity, access and drainage, the site represents a logical extension to Trowbridge and an opportunity to enhance the visual quality of the urban edge. The main constraints are familiar to all Trowbridge sites, but there is nothing to suggest development would result in unacceptable harm, either individually or in combination with other development. The allocation is therefore acceptable in principle.
88. The capacity assessment of 20 is also unduly pessimistic when considering the likely extent of the developable area. Such a restriction is not justified. A figure of approximately 45 dwellings is a more appropriate figure. Main modifications **MM56-MM61** are necessary to ensure a clear and effective policy framework is established, considering both the site's individual characteristics, but also the need to be mindful of the cumulative impacts of development occurring elsewhere nearby.
89. Southwick Court (H2.6) is allocated for around 180 dwellings. It comprises open fields on the edge of the settlement. The site is subject to several constraints relating to heritage, drainage and biodiversity. As a result, development is only suitable on the eastern part of the site. Although the Plan is silent on access, the Council has indicated a preference for access to be taken from Frome Road. This would result in a relatively long access road crossing the open part of the site. Achieving a satisfactory form of development will be challenging. Nevertheless, I am satisfied that with great care, there is scope for development on this site and thus the allocation is acceptable in principle.
90. The Council has taken the various constraints of the site into account in its selection and the supporting text identifies many of the measures necessary to deliver an acceptable form of development. These take account of the nature of land in the west of the site, the importance of the setting of the Southwick Court Farmstead, the need to retain as many of the natural features of the site as possible and the necessity to have regard to drainage

and biodiversity issues related to the Lambrok Stream and bats. In the interests of effectiveness, modifications will be necessary to elevate these matters into policy and to provide greater clarity on matters such as access, drainage and infrastructure. In all cases, further guidance and information on what will be expected from developers should be provided.

91. The delivery of the access road is clearly one of the most sensitive issues, as this would have to cross open land and would need to bridge the stream and take account of the water meadows. Nevertheless, the evidence is sufficient to support the view that, in principle, a satisfactory form of access could be provided. Notwithstanding the heritage issues with the site, Historic England has not objected to this allocation and has been in discussions about the measures that would need to be taken to ensure impacts are minimised. A suitable policy framework could be established to ensure the Council can adequately assess any impacts.
92. The gap to North Bradley would be reduced, but would still exist, particularly in relation to the football ground. The existing gap along Woodmarsh would also be maintained. The solar farms to the south do not alter this conclusion. While clearly not agricultural in nature, the solar panels do not have the character or permanence of residential development. They are also some distance from the southern extent of any likely development. As such, while there would be an inevitable change in the character of the area, the risk of coalescence between Trowbridge and North Bradley or Southwick would not be significant.
93. The proposed main modification as published for consultation includes reference to an emergency access from the north of the site. Concerns have been raised over this. The intent was to make it clear that no vehicular access other than an emergency access would be permitted from the north. The wording of the MM reflects this by stating that the only access from the north would be an emergency access. This excludes other forms of vehicular access. The wording of the modified policy could be interpreted to imply that the emergency access can only be taken from the north. This might be compounded by the modified supporting text relating to trees and hedgerows, which again implies that the emergency access would be from the north. There is a potential lack of clarity.
94. As a result, I have amended the wording of the proposed main modifications. This removes a specific reference to the 'north' in policy and supporting text. While an emergency access would be necessary, it does not have to be from the north. The amendments would not change the intent of the policy to any significant degree, as there would still be a requirement for an emergency access. My amendment simply makes it clear that an emergency access would be required. It would not preclude a proposal including an emergency access from the north but would also not stop alternatives being considered.
95. Overall, I am satisfied that with main modifications **MM62-MM67** in place the Plan will provide an effective framework for considering development of H2.6.

Warminster Sites – General

96. Overall, Warminster is a suitable location for development which supports the WCS. The WHSAP identifies four sites that would provide 235 additional

dwellings. Subject to the recommended main modifications below, the Plan will provide an additional 135 dwellings. This level of development is unlikely to result in any severe cumulative problems in relation to transport or local infrastructure. This would leave a shortfall against the indicative requirement, but for the reasons given above, there is no requirement to allocate additional sites.

Warminster Sites - Specific

97. Land at the East of the Dene (H2.7) is subject to several constraints relating to heritage assets. The site lies in the setting of the Grade II Listed Bishopstrow House and the Bishopstrow Conservation Area. There are other listed buildings in the vicinity of the site that would be affected by development. Views from Battlesbury Camp hillfort could also be affected by development. The Council's Heritage Impact Assessment (HIA) indicates that the significance of Bishopstrow House comes both from its aesthetic and architectural value, but also the extensive designed landscape that pre-dates the current house and the existing estate assets. The HIA concludes that limited development to the north west of the site would avoid harm to heritage assets.
98. The policy would allow for development in the more sensitive parts of the site in terms of the setting of Bishopstrow House and Bishopstrow Home Farm. Whilst the latter is a non-designated heritage asset, it nevertheless contributes positively to the setting and significance of the main House. To provide access to the developable part of the site would require a new access off Boreham Road. This would include the loss of a significant stretch of an existing high wall that is important to the character of the street and setting of the conservation area. The access road would also need to run through the southern part of the site, potentially having a detrimental impact on the setting of heritage assets. Even if similar measures to those described for sites H2.4 and H2.6 were considered, I am not convinced that the inevitable change in character would not result in unacceptable harm.
99. There is likely therefore to be a significant cumulative impact on the setting of both designated and undesignated heritage assets in the area. In allocating a site there should be reasonable certainty that potential impacts will be acceptable or able to be mitigated. This level of comfort does not exist, and serious doubts remain over whether a form of development would be possible that would not have an unacceptable degree of impact on the character, appearance or significance of heritage assets. This would be contrary to the requirements of the NPPF.
100. Notwithstanding the need for housing, I am not convinced that the benefit of development would outweigh potential harm in this location. The allocation of this site is therefore unjustified and contrary to national policy and it should be removed from the Plan along with consequential changes made to housing numbers (**MM5, MM21, MM70**).
101. An alternative approach to the site was put forward through consultation on further main modifications. This suggested reducing the allocation to the area to the north west and taking a new access from The Dene. This would involve the demolition of existing garages. This is a significantly different proposal that was not part of the submitted Plan, nor was it before me at the hearings.

While the evidence of the HIA suggests development in the north west corner would not result in the same degree of harm to heritage assets, the suitability and delivery of the access has not been tested through examination.

102. Addressing this new evidence would require the re-opening of the hearings. Before this could take place, further consultation would be required. There is no guarantee that following this course of action, the allocation would be considered sound. The delays this would cause to the adoption of the Plan, and the associated uncertainty in relation to housing delivery, are not justified by the level of development proposed. A review of the Local Plan is also already underway and this provides an opportunity for the revised site to be considered.
103. Land at Bore Hill Farm (H2.8) is allocated for around 70 dwellings. The site sits in undulating open ground between existing dwellings and commercial uses. The supporting text identifies an extant permission for B1 uses, which the Council wish to see included as part of any mix on the site. This site is adjacent to an existing bio-digester. There have been complaints about the odour from this facility, but there is nothing to suggest that these have been upheld or result in persistent long-term harm to the living conditions of residents. Nevertheless, while there is a reasonable likelihood that a satisfactory form of development could be achieved, it will still be necessary for any application to be accompanied by appropriate noise, dust and odour assessments to inform design and layout. This requirement needs to be set out in policy to be effective. There are no other overriding constraints on the site. The site boundary does not reflect the full developable area and should be amended in the interests of accuracy. Main modifications **MM71-MM74** are therefore necessary to ensure the Plan is justified and effective.
104. Land at Boreham Road (H2.9) is allocated for around 30 dwellings. Planning permission was granted for housing on this site on appeal and thus the principle of development has been established. There is nothing to suggest that the circumstances have changed since permission was granted, such that the site is no longer suitable for development. The site is near the Bishopstrow Conservation Area and adjacent to a Grade II Listed mile marker. Neither of these factors are an impediment to the principle of allocating the site. Modifications are necessary however to highlight the importance of heritage assets. There is however no justification to elevate the requirement to move the mile marker into policy, as this has already taken place. This reference should be removed.
105. The site is therefore in a suitable location for development, but modifications **MM75-MM78** are necessary to ensure the Plan is effective and consistent with national policy about flooding and heritage.

Warminster Community Area Remainder

106. Land at Barters Farm (H2.10) is allocated for 35 dwellings. The site forms part of a nursery and garden centre and is well related to existing dwellings in the village. Development would involve land that has been previously used for commercial purposes and would not extend to the north beyond existing dwellings on Wood Lane. There would be a reasonable buffer between the site and ancient woodland to the north. An acceptable form of access could be

achieved through Cleyhill Gardens and development would not result in a severe impact on the local transport network. Although small, development here would have the potential to help support local services and facilities of this Large Village. It would also contribute to meeting the indicative requirement for the Warminster CA Remainder and consequently the WCS. This is an acceptable location for development.

107. The Plan currently provides very little explanation as to what the Council expects on this site. While decision makers could rely to an extent on the WCS and national policy, the Plan should nevertheless be clear about any specific requirements as identified by the evidence base. This includes scale, the location of any access, the expectation that walking and cycling routes will be improved, the requirement for existing mature landscaping to be retained and enhanced and that there may be archaeological remains on site that should be assessed. As noted elsewhere, the potential for impacts on bats also needs to be highlighted. None of these factors render the site unsuitable for development. However, to be effective and consistent with other parts of the Plan, the policy and supporting text need to reflect this and explain what will be required, both in terms of assessment and mitigation (**MM79–MM81**).

Chippenham Community Area Remainder

108. Land at The Street, Hullavington (H2.11) is allocated for around 50 dwellings. This site is also being pursued through the Hullavington Neighbourhood Plan. This is at Regulation 16 stage and is likely to be going to referendum. The Neighbourhood Plan identifies a larger area for more dwellings. It may have been the case that when preparation of the WHSAP started, the Hullavington Plan was not at an advanced stage. However, as with other locations, it is inevitable that over time there are changes in context that need to be considered. In this case, the development proposed in Hullavington is neither of a scale nor complexity which suggests the WHSAP need 'intervene'. This is particularly the case where the Neighbourhood Plan already seeks to allocate the site. There are apparent inconsistencies between the two plans that would only be likely to result in confusion. Altering the WHSAP to be consistent with the Neighbourhood Plan would be neither necessary nor appropriate.
109. Allocating a site in this location is not therefore justified, particularly when the WHSAP would essentially be duplicating what is already being proposed for the area. Such an approach would also be inconsistent with paragraph 185 of the NPPF. It would also be inconsistent with the Council's position on other sites and locations in the WHSAP. To be sound, the site should be deleted from the Plan and consequential amendments made to the housing numbers and supporting text (**MM5, MM21, MM82**). There is no reason why this modification should prejudice the delivery of planned primary school expansion, which is also identified as an objective of the emerging Neighbourhood Plan.
110. Land east of Farrells Field, Yatton Kenynell (H2.12), is allocated for around 30 dwellings. Yatton Kenynell is classed as a Large Village which contains a small number of local facilities and services. The principle of development in this location is acceptable.

111. The site lies relatively close to the edge of the Cotswolds AONB, which takes in much of the village. There would be some visible encroachment into the countryside, but this need not be unduly harmful to the landscape character of the area or the setting of the AONB. Development would be well related to the edge of the village but would also be well screened by existing boundary treatments. To be effective however, the requirement to retain these should be elevated into policy along with other specific requirements, including those relating to access, improvements to cycling and walking routes and general matters of flood risk.
112. A satisfactory form of access for the scale of development proposed would not be achievable through Farrells Field. As such, reference to this should not be included in either policy or supporting text. A suitable access can be achieved directly from the B4309. To ensure certainty, this should be reflected in policy. The supporting text refers to the retention of a woodland corridor along the western boundary of the site. This extends either side of a farm track that runs along the boundary. However, this track is outside the ownership of the developer and is unlikely to form part of the development. Including this area in the site is not therefore justified. Reference to retaining the woodland should be removed from the Plan, along with any consequential changes to the policies map. Main modifications **MM83-MM88** are therefore necessary in the interests of effectiveness and to ensure the Plan is justified.

Malmesbury Community Area Remainder

113. Land at Ridgeway Farm (H2.13) is identified for around 50 dwellings. The Crudwell Neighbourhood Plan is in preparation, though had not reached Regulation 16 stage at the time of the WHSAP. Indicative requirements for the Malmesbury CA Remainder can largely be met without WHSAP allocations and thus there is no strategic imperative or necessity for the WHSAP to make strategic allocations in this Large Village. Moreover, the emerging Neighbourhood Plan has been consulted on and is at a stage where I am persuaded there is a clear commitment to progress the Neighbourhood Plan to referendum. There is also a clear intention for the Plan to include housing sites that will be capable of addressing local needs for the village. In these circumstances, the retention of the site would conflict with paragraph 185 of the Framework, which aims to give communities direct power to deliver the sustainable development they need. Accordingly, to be consistent with national policy, and with the Council's general approach to site selection, this site should be deleted and consequential changes made to housing numbers (**MM3, MM5, MM89**).

Westbury Community Remainder

114. Court Orchard/Cassways, Bratton (H2.14) is allocated for around 40 dwellings. A Neighbourhood Plan for Bratton was at the early stages of preparation at the time of the hearings. Unlike some others referred to, this Plan was not yet at a stage where it is clear whether it will progress toward referendum or whether it will allocate sites to meet local needs. As such, there is insufficient certainty or clarity about the Neighbourhood Plan to conclude that the allocation should be deleted. Scope exists for the WHSAP to 'intervene' in helping to meet the indicative needs of the CA remainder. In light of the

options considered, it is not unreasonable for the WHSAP to consider development in this Large Village.

115. The site is an open field on the edge of the village. It slopes steeply to the north and directly abuts housing fronting Westbury Road, Court Orchard and Rosenheim Rise. There is also housing directly opposite Westbury Road. While there would be some inevitable encroachment into the open countryside, development would not extend significantly beyond current built extent to the west. Development is likely to have some impact on the edge of the settlement, but with appropriate landscaping, design and layout, there is no reason to conclude that development would be unacceptably harmful to wider landscape character. In this regard, the supporting text refers to new woodland planting. Extensive woodland does not form part of the existing character of the area and thus there is no need to be this specific. Nevertheless, a new policy for the site should highlight the need for sensitive treatment of the edge of the village.
116. There is no clear evidence to suggest a safe and suitable form of access cannot be taken from the B0398. The anticipated increase in traffic should also not have an unacceptable impact on the local road network. The site is close to the Bratton Conservation Area and the Bratton Camp Scheduled Monument. There is no reason in principle why development should result in unacceptable harm to these heritage assets.
117. In the context of the character of the area, the Council has reassessed the site's capacity and concluded that 40 dwellings would result in too high a density. I agree that a figure of around 35 dwellings would allow for a more sensitive form of development. To ensure the policy is justified and effective, this figure should be used, with consequential amendments to the housing numbers (**MM6**). Although acceptable in principle, main modifications **MM90-MM95** are necessary to ensure the Plan is justified and effective. The Council consulted on a change to the boundary of the site as an additional modification. There is no evidence before me to conclude that change is necessary to make the Plan sound, and thus I have not recommended it as such.

South Wiltshire HMA

Salisbury Sites – General

118. Salisbury is identified as a Principal Settlement in the WCS and a focus for strategic growth. Considering the indicative requirement for the area, the level of growth anticipated and the overall supply provision in the SW HMA, seeking to increase housing delivery in this location is wholly consistent with the WCS. There is no clear evidence to suggest that all such needs could be met without additional greenfield development on the edge of the urban area.

Salisbury Sites - Specifics

119. Land at Netherhampton Road (H3.1) is allocated for around 640 dwellings, employment uses, a local centre, land for a two-form primary school and space for a country park. The allocation would extend the built form along Netherhampton Road into the open countryside. Nevertheless, the site is well related to the edge of Harnham and a main route into Salisbury itself. It is

adjacent to an industrial estate, which has recently had planning permission for residential development. The site was considered in relation to the WCS and was identified as a potential reserve site. It is in a suitable location to support the WCS spatial strategy.

120. While the development would significantly alter the urban edge, such impacts are an inevitable consequence of seeking to meet large housing needs in the area. The development would lead to additional pressures on roads and other local infrastructure, including schools, but as noted elsewhere this should not result in severe problems. The site is beyond a reasonable walking distance to most day-to-day facilities, but the provision of a primary school and local centre would provide some scope to reduce journeys over time. There is a bus stop some 600 metres from the site, which would provide some opportunities for public transport use. The scale of development is such that there may be opportunities for public transport to access the site directly once a critical mass has been established. Nevertheless, a development of this scale would inevitably lead to increased car use. However, the relative proximity of Salisbury and associated services, facilities and employment should help to ensure trip lengths are not unduly lengthy.
121. The requirements in relation to land for a primary school and country park are justified. There has been some criticism that a school in this location would generate additional traffic and additional journey lengths, particularly when considering the location of other development in Salisbury. However, there is logic in locating a primary school in proximity to the significant residential development envisaged on sites H3.1 and H3.3. This will reduce the need to travel from these sites and help offset any potential trip generation to the site from other developments elsewhere.
122. The policy is vague on the scale or type of employment land that may be required, with the supporting text suggesting this is something that could be addressed at the application stage. The evidence supporting the requirement for employment land on this site is not strong. Part of the justification is that the site would provide a possible location for business uses to decant from the Churchfields site allocated in the WCS. However, the Council has not identified a definitive amount of land or floorspace that would be needed. To leave this to the application stage would cause an unacceptable lack of clarity for developers trying to prepare a scheme. Furthermore, the Council has recently granted permission for the loss of employment land on the neighbouring site, which does not suggest strong evidence of demand. The lack of clear evidence supporting the need or guidance for employment uses leads me to conclude it is neither justified nor effective. There is also no evidence that would inform a main modification to provide clearer guidance. Accordingly, this element of policy should be deleted. There is nothing to suggest this would have any impact on the Council's employment land supply or strategy.
123. The policy requires provision of a local centre, but what this means in practice is not explained. While some on-site facilities on a site of this size are justified, the policy should provide some guidance about what would be expected. There is a lack of clarity about healthcare requirements, particularly in terms of whether additional provision is needed on site or whether off-site provision is acceptable. There is nothing to suggest the policy is seeking contributions

to healthcare over and above 'normal' contributions as required by the WCS, but equally there is no reason why this could not be provided on site. Modifications are needed to make it clear that contributions will be required in line with the WCS and could be used on- or off-site. This should provide a degree of comfort for developers and some flexibility in how needs are addressed.

124. As the site is in a sensitive location, the policy should also include more clarity over access arrangements and issues relating to design and layout. Restricting development to below the 75-metre contour will provide reasonable protection for nearby heritage assets, including Salisbury Cathedral, Old Sarum and Netherhampton Church. This will be supplemented by significant amounts of open space provision. Adequate protection of the Harnham Chalk Pit SSSI, Harnham Slope Country Wildlife Site and the River Avon SAC can be achieved, though modifications to policy and/or supporting text are necessary to ensure requirements are clear.
125. In conclusion, the allocation is in a relatively accessible location and, while it will have a significant impact on the character of the area, such change can take place without unacceptable harm. The site would provide a substantial number of new dwellings that will help bolster the supply of housing land in the area and go a substantial way to meeting the indicative requirements for Salisbury. Modifications **MM98-MM104** are necessary to ensure the policy provides a clear, comprehensive and effective policy, which is justified by the evidence. Consequential changes to supporting text to provide clarity will also be necessary.
126. Land at Hilltop (H3.2) is a small greenfield site on the edge of the settlement. Planning permission has already been granted and thus the principle of development has been established. The site is currently a vacant and overgrown plot that detracts from the character of the residential area. Development would relate well to the existing residential area and is suitably located for a small scheme. Although only for 10 dwellings, the development would still help to contribute to the overall strategic requirement for Salisbury without resulting in any unacceptable impacts.
127. There are still particular requirements which ought to be set out in policy. This includes addressing issues relating to the translocation of slow worms referenced in the supporting text. There appears to be ample scope to address this issue in the neighbouring country park or on other adjacent land. Such issues were considered in relation to the permitted scheme and not deemed prejudicial. The site is located on the brow of a hill and thus some care would be needed in relation to the scale of dwellings. The policy should make reference to this. However, there is no reason in principle why development here should be harmful to heritage assets. Main modifications are therefore necessary to ensure effectiveness (**MM105 & MM106**).
128. Land north of Netherhampton Road (H3.3) has been identified for around 100 dwellings. This would add to the westward growth of Harnham, but new houses would be well related to existing residential development to the east. It would also be well related to development associated with site H3.1 and could make use of any facilities that are included in that development. It is therefore an appropriate location for growth.

129. There are clear sensitivities associated with the setting of the Cathedral in this location. To be effective, the Plan should establish what measures will be expected to minimize impacts. This includes the provision of an open corridor to protect views of the Cathedral Spire, setting development back from the road and ensuring boundary treatments, landscaping and paraphernalia such as lighting and signage are properly considered. While some urbanisation of the Cathedral's setting is inevitable, there is ample scope within the site to ensure a sensitive form of development could come forward that need not result in undue harm.
130. The evidence also highlights the potential for archaeological finds on the site. This is not currently adequately addressed in the Plan and thus modifications are necessary to highlight this issue and what the Council will expect from proposals.
131. There are no other issues that would lead me to conclude the allocation of the site is not sound. Matters highlighted already in relation to the River Avon SAC, drainage, highways and other infrastructure can be resolved through the planning application process. Main modifications are therefore necessary to ensure the Plan is effective, but otherwise the principle of development is sound (**MM107–MM111**).
132. Land at Rowbarrow (H3.4) is allocated for around 100 dwellings. It comprises open fields adjacent to an existing area of recent residential development. As an urban extension, the site would have relatively good access to services by public transport. Some facilities are also available in the adjacent estate, including a local convenience store. The site slopes from the existing dwellings to an existing woodland belt. However, concerns over the impact on local character and the setting of the Cathedral could be adequately dealt with by good quality design and layout which takes account of the topography. The site boundary includes an area of woodland, which would be outside the developable area. The policies map should therefore be amended to reflect this.
133. The site is in a suitable location for additional growth and, subject to appropriate layout and design, there are no constraints sufficient to render the site unsuitable in principle. Main modifications **MM112–MM116** are necessary to ensure the policy framework for the site will be effective.
134. The Council proposed a modification to the Plan to include an additional site known as 'The Yard'. This came to light at the Regulation 19 consultation stage and was assessed in the same way as all other suggested sites. On this basis, the Council sought to include the site subsequent to the submission of the Plan. Planning permission already exists for the development. Not including this site in the Plan where the Council has accepted it is consistent with their site selection criteria would result in an inconsistent approach and would not be justified. I therefore consider that the site should be included, and a new allocation and policy created. As well as scale and access, the new policy should reflect the need for biodiversity issues relating to slow worms and barn owls to be considered in any proposal. There is no evidence to suggest either of these should be an impediment to development. Based on the evidence provided, excluding this site would not be justified. To be sound, the Plan should be modified to include the site as an allocation, with

consequential amendments to the housing numbers (**MM7, MM96, MM117-MM119**).

Amesbury, Bulford and Durrington

135. Land at Clover Lane, Durrington (H3.5) is allocated for around 45 dwellings. Permission already exists for 15 dwellings on the site. Durrington is identified in the WCS as a potential location for growth and there is a residual indicative need in the CA which this development would help to meet. The site takes up a long rectangular plot parallel to an allotment and a large recently built estate. This is a suitable location for a relatively small area of additional growth. Access would be taken from two points on Clover Lane. This would be acceptable from a transport perspective and would not have an unacceptable impact on the living conditions of existing residents.
136. The site is adjacent to the Durrington Conservation Area. With sensitive design and layout, there is no reason in principle why development should result in unacceptable harm to these assets. The supporting text sets out measures relating to the retention of trees and hedgerow bordering the site and improving links to High Street. These are justified requirements that for effectiveness should be included in a specific policy for the site. The site boundary does not reflect the full developable area and is not justified. The policies map should be amended to ensure accuracy and clarity. Main modifications **MM122-MM126** are necessary to ensure the Plan provides an effective framework for determining applications.
137. Land at Larkhill Road, Durrington (H3.6) is allocated for around 15 dwellings. The site wraps around and to the rear of an existing dwelling and to the rear of a veterinary practice. Although the site currently breaks up a largely continuous built-up frontage, infill development here need not have a significant impact on the character or appearance of the area. This part of Durrington is relatively close to the World Heritage Site, including Durrington Walls and Woodhenge. Development will therefore need to be subject to precautionary archaeological assessment. However, there is no reason why this should render development unacceptable in principle. These constraints should be reflected in both policy and supporting text. To be effective, main modifications are necessary to make it clear what will be expected in terms of scale, layout and design (**MM127-MM129**).
138. Subject to the main modifications outlined above, I am satisfied that the allocated sites are justified, effective and consistent with national policy.

Issue 3 – Are the proposed settlement boundaries justified, effective and consistent with national policy?

139. The Council has undertaken a thorough review of established settlement boundaries. This has been based on the methodology set out in Topic Paper 1: Settlement Boundary Review Methodology (TOP.01). The methodology used is logical, justified and soundly based.
140. The purpose of the settlement boundary is to illustrate the extent of the built form of the settlement. Allocations have been excluded at this stage. This is not an unreasonable approach. Allocations on the edge of settlements will inevitably include land which does not form part of the development.

Examples of this might be areas of public open space or landscape buffers. To include the whole of an allocation in advance of it coming forward would potentially include areas that would not normally be considered suitable for development under WCS policy. Over time, this could have the unintended consequence of establishing a principle in favour of development on land that was intended to act as mitigation for development delivered through the allocation. As settlement boundaries are subject to regular review, it is appropriate to wait until development is underway or complete to be able to fully ascertain where the extent of the built form lies.

141. WCS Core Policy 2 states that, subject to certain exceptions, development will not be permitted outside defined settlement boundaries. However, it cannot be reasonably asserted that this restriction would apply to sites allocated for development in an up-to-date development plan. As a result, excluding housing or employment allocations from settlement boundaries does not result in any uncertainty about whether development could proceed. The allocation establishes the principle of development and provides a greater degree of certainty about what will be expected than a generic 'windfall' policy. Excluding unimplemented allocations from settlements does not therefore prejudice developers' interests in any way.
142. Similarly, the extent of a planning permission does not always reflect the resulting built form. Using the 'redline' of an application may not lead to a suitable or consistent outcome in relation to settlement boundaries. If the settlement boundary were based on a permission that subsequently expired, then the revised settlement boundary also may not be appropriate. The context within which permissions are granted and the 'planning balance', can also change over time. If a permission expires, it is entirely appropriate for the Council to be able to reassess whether a new application would be successful. Including all unimplemented permissions within settlement boundaries would remove the Council's ability to assess this.
143. Being outside the settlement boundary would clearly not stop a scheme with planning permission being implemented. Should a new application be considered on the same site, then presumably the Council would take account of the planning history as a material consideration alongside any other relevant material considerations. Developers with extant permissions would therefore suffer no prejudice.
144. There is inevitably a degree of judgement as to where boundary lines should be drawn. These are judgements the Council is entitled to make. I am satisfied therefore that the process they have gone through is robust and judgements made are sound. There will always be some disagreement over where the line should be drawn, but these are not sufficient to render the Council's approach or conclusions unsound in principle.
145. As noted elsewhere, the policies map is not defined in statute as a development plan document and so I do not have the power to recommend modifications to it. However, to be consistent with the Plan's objectives and to ensure the development plan as a whole is effective, then changes to settlement boundaries proposed through this review as identified in EXAM.01 and WHSAP.03.02-46 and Appendix 1 of the Schedule of Further Main Modifications should be made.

146. In conclusion on this issue, I am satisfied that the proposed settlement boundaries are justified, effective and consistent with national policy.

Assessment of Legal Compliance

147. Other than in respect of the timetable for the examination and adoption of the Plan, the WHSAP has been prepared in accordance with the Council's Local Development Scheme (LDS) as updated in April 2019. There are no legal compliance failures in this regard.

148. The Council's Statement of Community Involvement (SCI) (SCI.01) was published in July 2015. I recognise that consultation in the Plan, which has taken place over several stages, has been for some people somewhat confusing and has included large amounts of technical and background evidence. Nevertheless, I am satisfied that each stage of consultation has been carried out in accordance with the SCI. This includes the focussed consultation of the Schedule of Proposed Changes and consultation on further main modifications.

149. There is a requirement in section 19(5) of the 2004 Act for local authorities to carry out Sustainability Appraisal (SA) as part of the preparation of a local plan. This is a systematic approach to identify, decide and evaluate the likely significant effects of the Plan and reasonable alternatives in order to promote sustainable development. The NPPF states that SAs should be proportionate and the process is an iterative one.

150. The main SA Report was produced in May 2018 and there have been subsequent revisions and addenda to consider the effects of the Schedule of Proposed Changes (WHSAP.03) and the effects of the further main modifications. The SA identified 12 SA objectives against which proposals were assessed. These are appropriate to the scope of the Plan, local context and national policy. Assessment of the Plan against objectives was undertaken by experienced assessors, with input from Council officers. I am satisfied the overall approach has been adequate.

151. There have been regular complaints throughout the examination about the accuracy or consistency of the scoring undertaken for individual sites. Disputes about such findings are nevertheless to be expected. These are often due to differences in planning opinion and do not undermine the SA process undertaken. Furthermore, the SA is not the only basis on which allocations have been made. The SA allows a range of considerations affecting sites to be assessed in a coherent way but does not remove the need for the exercise of judgement by the Council.

152. It has been argued that the SA is inadequate because it did not consider all reasonable options. This primarily relates to the initial sifting of sites. It is argued that the sites 'excluded' at an early stage should have been informed by the SA process. In the context of the WHSAP being a follow-up subordinate plan to the WCS, it is not unreasonable for the Council to have limited the scope of the site selection exercise. Sites rejected at Stages 1 and 2 of the Site Selection process were not considered to be 'reasonable alternatives' for the WHSAP to consider. As such, there is logic in them not having been considered through the SA and the SA is not flawed in this regard.

153. There has also been criticism of the methodology of assessing sites as 'more' or 'less' sustainable. Sites considered 'more' sustainable were generally taken forward for further assessment. Whether or not a site was considered more or less sustainable was based on a judgement. While it has been suggested this was arbitrary, there will always be elements of judgement in determining which sites should be taken forward for further consideration. This is part of the iterative process that is inherent in the SA and site selection process. There is nothing in this that would lead me to conclude the SA was inadequate in its approach. Again, this was not the only measure by which sites were considered. The whole of the evidence base was taken into account in deciding what sites to take forward for more detailed analysis and what to allocate. This also includes judgements about balancing any impacts and the benefits associated with development coming forward.
154. Overall, I am satisfied that the SA has sufficiently evaluated the reasonable alternatives and is suitably comprehensive, satisfactory and legally compliant.
155. The Habitat Regulations Assessment (HRA), as supplemented by revisions and addenda to consider modifications, conclude that the WHSAP would not be likely to have an adverse effect on the integrity of any European Designated site (HRA.01/02/02a/03). This included Appropriate Assessment of likely significant effects on Salisbury Plain SPA, BBAB-SAC and the River Avon SAC. This took into account recreational pressures, phosphates, water abstraction and potential habitat loss and deterioration. Reasonable and realistic mitigation measures have been identified, as referred to in the discussion of the main issues. Where necessary, these have been identified in the Plan and/or have been recommended for inclusion through main modifications. I am satisfied therefore that the HRA meets the relevant statutory requirements.
156. The Plan seeks to identify sites in locations well related to existing settlements. This should reduce the distance travelled to meet everyday needs. It also maximises opportunities to access services by means other than the car and seeks to bolster the vitality of rural communities in some cases. All site specific policies highlight the need and importance of addressing any potential flood risk. Where practical, they also seek to improve transport links, including walking and cycling. The WHSAP also forms part of the development plan as a whole for Wiltshire and all proposals will be considered against policies within it. Overall, in relation to those matters within the scope of the WHSAP, there are policies designed to ensure that the development and use of land contribute to the mitigation of, and adaptation to, climate change.
157. The WHSAP complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.
158. In reaching the conclusion above, I have had due regard to the Public Sector Equality Duty contained in the Equality Act 2010. I do not consider that my findings will impact negatively on anyone with a relevant protected characteristic in respect of the matters identified by section 149 of the Act, neither will any part of the Plan be a barrier to providing for inclusive design and accessible environments as required by the NPPF.

Overall Conclusion and Recommendation

159. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

160. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Wiltshire Housing Site Allocation Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

S J Lee

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Appendix 1: Wiltshire Housing Site Allocations Plan (WHSAP)
Consolidated Schedule of Recommended Main Modifications (December 2019)

The Main Modifications are set out in plan order. The paragraph numbers and policy references refer to the Submission version of the Wiltshire Housing Sites Allocations Plan (WHSAP) (July 2018) (WHSAP.01) and do not take account of any deletions or additions contained within these modifications. Changes to text are expressed in the conventional form of either ~~strike through~~ for deletions and underlining for additions of text. Policy wording is shown in **bold**.

Main Modification (MM) ref number	Submission Draft Plan reference	Reference Number of Proposed Change (PC) or Further Main Modification (FMM)	Main Modification												
MM1	Paragraph 1.1	FMM 1	<p>Insert the following text immediately after paragraph 1.1:</p> <p><u>The policies of this Plan are strategic in nature. As a whole, the Plan supports the delivery of the Wiltshire Core Strategy. Therefore, the site allocations in this Plan will support the delivery of housing to meet strategic needs. However, as anticipated by Core Policy 2 of the Wiltshire Core Strategy, there remains a role for parish and town councils in bringing forward neighbourhood plans to deliver non-strategic allocations to support housing supply.</u></p>												
MM2	Table 4.2	PC 7	Delete: Market Lavington.												
MM3	Table 4.3	PC 9	Delete: Malmesbury Community Area Remainder												
MM4	Table 4.4	PC 11	<p>Delete text referring to allocations at Market Lavington:</p> <table border="1"> <tr> <td rowspan="3">Market Lavington</td> <td>1089</td> <td>Southcliffe</td> <td>15</td> </tr> <tr> <td>2055 / 530</td> <td>Underhill Nursery</td> <td>50</td> </tr> <tr> <td>3443</td> <td>East of Lavington School</td> <td>15</td> </tr> </table>	Market Lavington	1089	Southcliffe	15	2055 / 530	Underhill Nursery	50	3443	East of Lavington School	15		
Market Lavington	1089	Southcliffe	15												
	2055 / 530	Underhill Nursery	50												
	3443	East of Lavington School	15												
MM5	Table 4.5	PC 12	<p>Delete text and footnote referring to allocations at Warminster, Hullavington and Crudwell:</p> <table border="1"> <tr> <td>Warminster</td> <td>603</td> <td>East of the Dene</td> <td>100</td> </tr> <tr> <td>Hullavington</td> <td>690</td> <td>The Street</td> <td>50</td> </tr> <tr> <td>Crudwell</td> <td>3233</td> <td>Ridgeway Farm</td> <td>-50⁴³</td> </tr> </table>	Warminster	603	East of the Dene	100	Hullavington	690	The Street	50	Crudwell	3233	Ridgeway Farm	-50 ⁴³
Warminster	603	East of the Dene	100												
Hullavington	690	The Street	50												
Crudwell	3233	Ridgeway Farm	-50 ⁴³												

			⁴³ This total includes 10 dwellings that already have planning permission																				
MM6	Table 4.5	PC 13	<p>Update housing numbers as follows:</p> <table border="1" style="margin-bottom: 10px;"> <tr> <td>Trowbridge</td> <td>613</td> <td>Elm Grove Farm</td> <td>200 <u>250</u></td> </tr> </table> <table border="1" style="margin-bottom: 10px;"> <tr> <td>Trowbridge</td> <td>3260</td> <td>Upper Studley</td> <td>20 <u>45</u></td> </tr> </table> <table border="1" style="margin-bottom: 10px;"> <tr> <td>Trowbridge</td> <td>298</td> <td>Land off the A363 at White Horse Business Park</td> <td>150 <u>175</u></td> </tr> </table> <table border="1" style="margin-bottom: 10px;"> <tr> <td>Trowbridge</td> <td>297/ 263</td> <td>Elizabeth Way</td> <td>205 <u>355</u></td> </tr> </table> <table border="1"> <tr> <td>Bratton</td> <td>321</td> <td>Court Orchard / Cassways</td> <td>40 <u>35</u></td> </tr> </table>	Trowbridge	613	Elm Grove Farm	200 <u>250</u>	Trowbridge	3260	Upper Studley	20 <u>45</u>	Trowbridge	298	Land off the A363 at White Horse Business Park	150 <u>175</u>	Trowbridge	297/ 263	Elizabeth Way	205 <u>355</u>	Bratton	321	Court Orchard / Cassways	40 <u>35</u>
Trowbridge	613	Elm Grove Farm	200 <u>250</u>																				
Trowbridge	3260	Upper Studley	20 <u>45</u>																				
Trowbridge	298	Land off the A363 at White Horse Business Park	150 <u>175</u>																				
Trowbridge	297/ 263	Elizabeth Way	205 <u>355</u>																				
Bratton	321	Court Orchard / Cassways	40 <u>35</u>																				
MM7	Table 4.6	PC 14	<p>Insert new row indicating the proposed new allocation at Salisbury:</p> <table border="1" style="margin-left: 40px;"> <tr> <td>Salisbury</td> <td>OM00 <u>3</u></td> <td>The Yard</td> <td>14</td> </tr> </table>	Salisbury	OM00 <u>3</u>	The Yard	14																
Salisbury	OM00 <u>3</u>	The Yard	14																				
MM8	Paragraph 4.52	PC 25	<p>Amend the paragraph to read:</p> <p>Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 <u>1,050</u> dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 4,220 <u>1,297</u>.</p>																				
MM9	Para 5.4	PC 33 and PC 34	Amend paragraph, from third sentence, to read:																				

			<p>Most sites proposed are of more than one hectare, <u>and will therefore require a flood risk assessment (incorporating an assessment of the predicted effects of climate change) in order to ensure that there is no increase in risk of flooding on site and elsewhere, and will need to comply thereby complying with Core Policy 67 (Flood Risk) with regard to flood risk and national policy. In addition, sites proposed within Source Protection Zones (SPZ) 1 and 2 will need to comply with Core Policy 68 (Water Resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy. Consideration should be given to the predicted effects of climate change and proposals should allocate appropriate buffer strips where there is no adjacent built development. Natural flood management should be incorporated into planning proposals to mitigate new and existing developments.</u></p>
MM10	Add new paragraph after Paragraph 5.4	PC35	<p>Insert new paragraph to read:</p> <p><u>The Environment Agency and Natural England advise that all development within the River Avon catchment should be 'phosphate neutral' for an interim period until 2025. Beyond this time an approach will take account of water company planning, as well as latest Government policy and legislation. This is to guard against a further worsening of the condition of the River Avon Special Area of Conservation (SAC). An annex of the Nutrient Management Plan will explain measures to help deliver phosphate neutral development and how they will be delivered. Some measures are capable of being delivered as a part of housing development. Off-site measures are supported by Community Infrastructure Levy and there is also scope to improve the efficiency of sewage treatment works. The definition of 'phosphate neutral' is the additional phosphorus load generated by new development after controls at source, reduction by treatment and/or off-setting measures leading to no net increase in the total phosphorus load discharged to the River Avon SAC.</u></p>
MM11	Paragraph 5.11	PC 37	<p>Amend paragraph 5.11 to read:</p> <p>As appropriate, additional evidence will need to be prepared at a level of detail to support a planning application. Such new evidence can be used as a material consideration when considering a specific planning application. In many cases, particularly important items are referred to for each allocation. Such evidence may include, but is not limited to a Landscape and Visual Impact Assessment, site specific Heritage Impact Assessment, Biodiversity Report, Surface Water Management Plan <u>(incorporating a site wide, comprehensive drainage strategy)</u>, Flood Risk Assessment <u>(incorporating an assessment of the predicted effects of climate change)</u>, and Transport Statement.</p>
MM12	Policy H1, Table 5.2, Paragraph 5.13	PC 32 & PC 38 and FMM 2	<p>Amend title in third column in Table 5.2 as follows:</p> <p>No of dwellings <u>Approximate number of dwellings</u></p>

			<p>Amend table 5.2 to remove reference to allocations at Market Lavington.</p> <p>Delete the title 'Policy H1' and the shaded text box but retain the rest of the information as supporting text as part of paragraph 5.13, as follows:</p> <p>Paragraph 5.13 – Land for housing development is identified to support the role of settlements in the East Wiltshire HMA, to ensure supply, improve choice and competition in the market for land. <u>The following site is allocated for development, as shown on the Policies Map:</u></p> <p>Policy H1 Land is allocated for residential development at the following sites, as shown on the policies map: Table 5.2 <u>Housing Allocation in the East Wiltshire Housing Market Area</u></p> <table border="1" data-bbox="795 600 1738 1067"> <thead> <tr> <th>Community Area</th> <th>Reference</th> <th>Site Name</th> <th><u>Approximate number</u> No of dwellings</th> </tr> </thead> <tbody> <tr> <td>Tidworth</td> <td>H1.1</td> <td>Empress Way, Ludgershall</td> <td>270</td> </tr> <tr> <td rowspan="3">Devizes</td> <td>H1.2</td> <td>Underhill Nursery, Market Lavington</td> <td>50</td> </tr> <tr> <td>H1.3</td> <td>Southcliffe, Market Lavington</td> <td>45</td> </tr> <tr> <td>H1.4</td> <td>East of Lavington School, Market Lavington</td> <td>45</td> </tr> </tbody> </table>	Community Area	Reference	Site Name	<u>Approximate number</u> No of dwellings	Tidworth	H1.1	Empress Way, Ludgershall	270	Devizes	H1.2	Underhill Nursery, Market Lavington	50	H1.3	Southcliffe, Market Lavington	45	H1.4	East of Lavington School, Market Lavington	45
Community Area	Reference	Site Name	<u>Approximate number</u> No of dwellings																		
Tidworth	H1.1	Empress Way, Ludgershall	270																		
Devizes	H1.2	Underhill Nursery, Market Lavington	50																		
	H1.3	Southcliffe, Market Lavington	45																		
	H1.4	East of Lavington School, Market Lavington	45																		
MM13	Policy H1.1	PCs 40, 41, 42, 43, 44 and FMM 3	<p>Amend policy H1.1 as follows:</p> <p>Land at Empress Way, as identified on the Policies Map, is proposed <u>allocated</u> for mixed-use development comprising the following elements:</p> <ul style="list-style-type: none"> • approximately 270 dwellings; • a connecting highways link between <u>vehicular access from</u> Empress Way and Simonds Road/New Drove, via the adjoining development at the former Granby Gardens site via the 																		

			<p><u>Granby Gardens development site, together with a connecting highways link between the two points of access;</u></p> <ul style="list-style-type: none"> • <u>1.8ha of land reserved for a two-form entry primary school in the south-eastern corner of the site; and</u> • A strong landscape framework including significant screening to the southern and eastern boundaries of the site. • <u>improvements to cycling and walking routes through the site to link into the existing network, including the retention and enhancement of public rights of way LUDG1 and LUDG2.</u> <p><u>Development proposals will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>a planning obligation to safeguard land for a primary school for an agreed period of time;</u> • <u>a transport assessment that will determine the trigger point for the delivery of the access via Simonds Road and inform detailed measures to mitigate impacts on the local road network;</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site;</u> • <u>layout and design of the development will be expected to take particular care to ensure that a suitable boundary with the open countryside is provided; and</u> • <u>layout of the development will be informed by an odour assessment, to be undertaken in consultation with Southern Water to ensure a satisfactory living environment will be created.</u> <p><u>Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements and opportunities, delivered to achieve the comprehensive development of the site, including the timely and coordinated provision of necessary infrastructure.</u></p>
MM14	Paragraph 5.19	PC41	<p>Amend last sentence of paragraph 5.19 to read:</p> <p>Transport assessment will <u>determine the trigger point for the delivery of the access via Simonds Road and</u> inform detailed measures to mitigate impacts on the local road network, including the A342 Andover Road, Memorial Junction and the capacity of the signals on the nearby railway bridge.</p>

MM15	Paragraph 5.20	PC 42 and FMM 4	<p>Amend paragraph 5.20 as follows:</p> <p>Development of the site will include 1.8ha reserved for a two-form entry primary school. Based on current estimates, <u>capacity within local primary schools capacity</u> will be absorbed by committed development elsewhere in the town. The need to retain the reserved land for a school will be determined as part of the application process based on demand <u>an assessment of future need for primary school places at the time of an application at that time</u>. In the event that land for a school is not required within a period to be <u>agreed with Wiltshire Council's Education Department</u>, then the land will be returned and thereby revert to <u>agricultural use</u>. Responsibility for provision of the school will lie with the Council and the process and <u>timescale for delivery will be in agreement with the developer</u>. The development will also be subject to the <u>normal contributions to education provision in accordance with core policies of the Wiltshire Core Strategy</u>.</p>
MM16	Paragraph 5.21	PC 40 and PC44	<p>Amend paragraph to read:</p> <p>The site design will be led by a strong landscape framework. Significant additional screening at the southern and eastern site boundaries would be required, along with landscaping and green infrastructure throughout the site as there are middle and long-distance views of the site from the south. The final design and layout should be informed by a Landscape and Visual Impact Assessment. <u>Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy</u>. Development will provide a connection to the nearest point of adequate capacity in the <u>sewerage network, as advised by the service provider</u>. Development layout should be informed by an <u>odour assessment, to be undertaken in consultation with Southern Water</u>.</p>
MM17	Section titled 'Devizes Community Area Remainder'	PC45	Delete section title ' Devizes Community Area Remainder ' and delete paragraphs 5.22 – 5.24.
MM18	Housing Allocation H1.2	PC46	<p>Delete section title 'H1.2 Underhill Nursery, Market Lavington'.</p> <p>Delete site boundary map at Figure 5.2.</p> <p>Delete paragraphs 5.25 to 5.33.</p>
MM19	Housing Allocation H1.3	PC47	<p>Delete section title 'H1.3 Southcliffe, Market Lavington'.</p> <p>Delete site boundary map at Figure 5.3.</p>

			Delete paragraphs 5.34 to 5.35.											
MM20	Housing Allocation H1.4	PC48	Delete section titled ' H1.4 East of Lavington School, Market Lavington '. Delete site boundary map at Figure 5.4. Delete paragraphs 5.36 to 5.37.											
MM21	Policy H2 Table 5.3 Paragraph 5.40	PC 32, PC 51 (which also relates to PC55, PC60, PC64, PC70, PC94, PC92, PC93) and FMM 5.	<p>Amend title in third column in Table 5.3 as follows:</p> <p>No of dwellings <u>Approximate number of dwellings</u></p> <p>Amend table 5.3 to amend number of dwellings proposed, and to reflect the removal of the allocations at Crudwell, East of the Dene, Warminster and Hullavington.</p> <p>Delete the title 'Policy H2' and the shaded text box but retain the rest of the information as supporting text as part of paragraph 5.40, as follows:</p> <p>Other allocations are made at Warminster, a Market Town, to support its role and at designated Large Villages in the rural parts of Chippenham, Malmesbury and Westbury Community Areas geared to support local needs in accordance with WCS Core Policy 2. <u>The following sites are allocated for development, as shown on the policies map:</u></p> <p>Policy H2 Land is allocated for residential development at the following sites, as shown on the policies map: Table 5.3 <u>Housing Allocations in the North and West Wiltshire Housing Market Area</u></p> <table border="1"> <thead> <tr> <th>Community Area</th> <th>Reference</th> <th>Site Name</th> <th>Approximate number <u>No of dwellings</u></th> </tr> </thead> <tbody> <tr> <td rowspan="2">Trowbridge</td> <td>H2.1</td> <td>Elm Grove Farm, Trowbridge</td> <td>200<u>250</u></td> </tr> <tr> <td>H2.2</td> <td>Land off the A363 at White Horse</td> <td>450<u>175</u></td> </tr> </tbody> </table>	Community Area	Reference	Site Name	Approximate number <u>No of dwellings</u>	Trowbridge	H2.1	Elm Grove Farm, Trowbridge	200 <u>250</u>	H2.2	Land off the A363 at White Horse	450 <u>175</u>
Community Area	Reference	Site Name	Approximate number <u>No of dwellings</u>											
Trowbridge	H2.1	Elm Grove Farm, Trowbridge	200 <u>250</u>											
	H2.2	Land off the A363 at White Horse	450 <u>175</u>											

					Business Park, Trowbridge		
				H2.3	Elizabeth Way, Trowbridge	205 <u>355</u>	
				H2.4	Church Lane, Trowbridge	45	
				H2.5	Upper Studley, Trowbridge	20 <u>45</u>	
				H2.6	Southwick Court, Trowbridge	180	
			Warminster	H2.7	East of the Dene, Warminster	400	
				H2.8 <u>H2.7</u>	Bore Hill Farm, Warminster	70	
				H2.9 <u>H2.8</u>	Boreham Road	30	
				H2.10 <u>H2.9</u>	Barthers Farm Nurseries, Chapmanslade	35	
			Chippenham	H2.11 <u>H2.4</u> <u>0</u>	The Street, Hullavington	50	
				H2.12 <u>H2.1</u> <u>1</u>	East of Farrells Field, Yatton Keynell	30	
			Malmesbury	H2.13	Ridgeway Farm, Crudwell	50	

			Westbury	H2.13 2	Off B3098 adjacent to Court Orchard / Cassways, Bratton	40-35
MM22	Paragraph 5.44, first bullet point	FMM 6	<p>Amend supporting text as follows:</p> <p>Ecology: an interconnected pattern of priority Biodiversity Action Plan (BAP) habitats such as mature hedgerows, trees and water features, along with designated woodland features around the town support significant populations of protected bat species associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). Additional housing development will increase the population of the town and thereby amplify the risk of recreational pressure on bats. To address this issue, the Habitats Regulations Assessment (HRA) for the Plan recommends developing a strategy for managing recreational pressure across the town. <u>This states that core bat habitat should be retained and buffered to protect and enhance the local features, to be identified through appropriate survey, of each site.</u> Detailed design and layout of schemes <u>will be informed by survey work in accordance with the Trowbridge Bat Mitigation Strategy (TBMS) and would need to consider additional planting and open space to protect and enhance these BAP priority habitats and thereby augment opportunities for bat foraging routes and roosting sites.</u> This could include <u>establishing dark corridors through sites to protect foraging routes and roosting areas for bats.</u> Specific measures that will be required are explained for each site and funding contributions may also be sought towards <u>the delivery of potential offsite measures and monitoring, including new woodland planting and land acquisition to create a Suitable Alternative Natural Greenspace (SANG) to alleviate recreational pressure on core bat habitat, as defined to be contained in the Trowbridge Bat Recreation Management Mitigation Strategy.</u></p>			
MM23	Paragraph 5.44, second bullet point	FMM 7 and PC53 (superseded)	<p>Delete supporting text as follows:</p> <p>Education: development will increase the number of pupils needing primary school places. A local lack of capacity across the town affects proposals allocated for development. With the majority of proposed housing being directed south/south-west of the town, the evidence points directly to the need for a new primary school in this area. Therefore, in addition to land reserved for one new school, funding contributions will be sought from developers to help provide adequate capacity.</p>			
MM24	Policy H2.1	PC 55 & PC 56 and FMM 8	<p>Amend policy H2.1:</p> <p>Approximately 14.43ha of land at <u>Land at Elm Grove Farm, as identified on the Policies Map, is proposed allocated for mixed use development comprising the following elements:</u></p>			

			<ul style="list-style-type: none"> • approximately 200 <u>250</u> dwellings; • At least 1.8ha of land for a two form entry primary school along with playing pitches; • a multi-purpose community facility <u>co-located with existing or improved open space;</u> • a <u>significantly improved and consolidated public open space area incorporating and augmenting the existing Queen Elizabeth II Field to provide a play area, junior level sports pitches and changing facilities for local community teams to utilise;</u> • a road from the A363 through to an improved junction of Drynham Lane and Wiltshire Drive; and • new <u>improvements to cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site and the White Horse Business Park.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;</u> • <u>retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements;</u> • <u>core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u> • <u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS; and</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u> <p><u>Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements and opportunities, delivered to achieve the comprehensive development of the site, including the timely and coordinated provision of necessary infrastructure.</u></p>
MM25	Paragraph 5.46	FMM 9, PC 55 (and PC 54, now superseded)	Amend text as follows:

			Approximately 17.61 14.33 ha of land at Elm Grove Farm is allocated for the development of approximately 200 250 dwellings, <u>along with a multi-purpose community facility co-located with consolidated and improved public open space</u> , as shown on the Policies Map. It is well located...
MM26	Paragraph 5.47	PC 57	Insert additional text at the start of paragraph 5.47: <u>Proposals to develop the site will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy.</u> The existing natural features of the site...
MM27	Paragraph 5.48	FMM 10	Amend text: The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on and adjacent to the site. These would <u>will be identified through survey and assessments guided by the requirements of the TBMS and include:</u> Drynham Lane/Road, the railway line, woodland belts associated with the White Horse Business Park and the small tributary to the River Biss.
MM28	Paragraph 5.49	FMM 11 (and PC 52 now superseded)	Amend the first sentence and add text to the end of the paragraph as follows: These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m) , dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy. <u>The design and layout of development, including the size and location of landscape corridors, lighting, other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments.</u> <u>Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary.</u>
MM29	Paragraph 5.50	PC 58 and FMM 12	Amend the fifth sentence as follows: Access to the site would need to be holistically planned with upgrades required to Drynham Lane, along with the construction of a connection to the A363 designed as a through-route anticipating future traffic growth. New and improved walking and cycling routes to existing and planned local services would encourage future residents to use sustainable forms for transport. The site has medium potential for archaeological remains. Therefore any subsequent planning application should be informed by an archaeological assessment. In addition, development will need to minimise the potential to harm the

			significance of the Grade II Listed Drynham Lane Farmhouse <u>along with Grade II listed Southview Farmhouse and, where appropriate, their settings.</u> Measures may also be necessary to prevent potential noise pollution from the existing main road and railway. These considerations should be addressed through the process of detailed design and layout which should be informed through a Heritage Impact Assessment <u>by detailed assessments (including heritage) to support any subsequent planning applications.</u>
MM30	Paragraph 5.51	FMM 13	Amend text: In order to facilitate development a <u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at additional local schools, capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town in accordance with core policies of the Wiltshire Core Strategy.</u>
MM31	Figure 5.5	PC54	Amend Figure 5.5 (see end of schedule - Map 'H2.1: Elm Grove, Trowbridge')
MM32	Insert new policy	FMM 14	New policy for H2.2 as follows: <u>Land off A363 at White Horse Business Park, as identified on the Policies Map, is allocated for development comprising the following elements:</u> <ul style="list-style-type: none"> • <u>approximately 175 dwellings;</u> • <u>vehicular access from the A363;</u> • <u>development to be directed to the north and east of the site; and</u> • <u>improvements to cycling and walking routes through the site to link into the existing network.</u> <u>Development will be subject to the following requirements:</u> <ul style="list-style-type: none"> • <u>core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u> • <u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;</u> • <u>retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, incorporating open space provision. Development will be expected to enhance a key gateway approach to the town and retain visual separation between the town and North Bradley;</u>

			<ul style="list-style-type: none"> • <u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments. Development proposals will make a positive contribution towards conserving and enhancing the significance of the Baptist burial ground, its gateway and its setting; and</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></p>
MM33	Paragraph 5.52	PC 60	<p>Amend first sentence of paragraph 5.52 as follows:</p> <p>...land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 450 <u>175</u> dwellings, as identified on the Policies Map.</p>
MM34	Paragraph 5.54	FMM 15	<p>Amend paragraph as follows:</p> <p>The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site <u>will be identified through survey and assessments guided by the requirements of the TBMS</u> and include: woodland belts associated with the White Horse Business Park; a network of mature hedgerows / hedgerow trees; and the grounds of Willow Grove.</p>
MM35	Paragraph 5.55	FMM 16 (incorporating PC 52)	<p>Amend text of first sentence and add additional text to end of paragraph as follows:</p> <p>These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. <u>The design and layout of development, including the size and location of landscape corridors, lighting, other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary. Development will be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy.</u></p>

MM36	Existing Paragraph 5.56	PC 62	<p>Amend paragraph to read:</p> <p>Proposals would need to provide for a high quality, sustainable development that enhances a key gateway approach to the town, whilst protecting the integrity of North Bradley as a village. <u>In addition, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.</u></p>
MM37	New paragraph after paragraph 5.56	PC 61 as amended by FMM 17	<p>Add new paragraph after paragraph 5.56, as follows:</p> <p><u>As identified in the Council's Heritage Impact Assessment, the site is an historic agricultural landscape and comprises a cluster of historic farmsteads where the farm houses and ancillary buildings may be susceptible to setting change. This includes Kings Farmhouse (Grade II listed), Willow Grove (Grade II listed), Little Common Farm (non-designated asset), Manor Farmhouse (Grade II listed) and Woodmarsh Farm (non-designated asset). An area of the site is also adjacent to a Baptist cemetery with an ornamental gateway structure (Grade II listed) and curtilage listed perimeter walls. A comprehensive approach to development will need to be undertaken that makes a positive contribution towards conserving and enhancing the significance of heritage assets. At the planning application stage, the layout and design of the site must give great weight to conserving the significance of these heritage assets and their setting in order to minimise harm. The Baptist burial ground and gateway is in poor condition and in ensuring that a comprehensive approach is taken to the development of the site, a positive contribution will also be required towards conserving and enhancing the significance of this heritage asset and it's setting. It will be expected that the developer of the site will work with the Church to ensure that a positive strategy is in place to protect and enhance the Baptist burial ground and gateway. The archaeological potential of the site is likely to be high. Given the potential for heritage assets with archaeological interest to be present within the site, field evaluations will need to be carried out and taken into account in developing proposals, to minimise any conflict between the heritage asset's conservation and any aspect of the proposal.</u></p>
MM38	Paragraph 5.57	FMM 18	<p>Amend text as follows:</p> <p>In order to facilitate development a <u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at additional local schools, capacity. Funding contributions may also be sought</u></p>

			<p>where needed to increase capacity at local GP surgeries and dentistry at the town <u>in accordance with core policies of the Wiltshire Core Strategy.</u></p>
MM39	Figure 5.6	PC 59	Amend Figure 5.6 (see end of Schedule - Map 'H2.2: Land off A363 White Horse Business Park, Trowbridge')
MM40	Insert new policy Figure 5.7	FMM 19	<p>Insert new policy for H2.3 as follows:</p> <p><u>Land to the South West of Elizabeth Way, as identified on the Policies Map, is allocated for development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 355 dwellings;</u> • <u>vehicular access points from Elizabeth Way; and</u> • <u>improvements to cycling and walking routes through the site to link into the existing network.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u> • <u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;</u> • <u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;</u> • <u>retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, incorporating noise attenuation measures and open space provision; and</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></p>

MM41	Paragraph 5.58	PC 64	Amend first sentence in paragraph 5.58 as follows: ... land to the South West of Elizabeth Way is allocated for the development of approximately 205 <u>355</u> dwellings, as identified on the Policies Map.
MM42	Paragraph 5.60	FMM 20	Amend text: This site may be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Potentially sensitive habitat features on / adjacent to the site <u>will be identified through survey and assessments guided by the requirements of the TBMS and include:</u> mature trees; hedgerows; and stream (minor watercourse) at the northern end of the site.
MM43	Paragraph's 5.61 and 5.62	FMM 21	Amend and merge paragraphs 5.21 and 5.22 as follows: These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m) , dark (<1 lux) , continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. <u>The design and layout of development, including the size and location of landscape corridors, lighting and other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary. Development will also be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy through a financial contribution or direct provision of equivalent new infrastructure over and above normal Council requirements to deliver new habitat and recreational opportunities in line with criteria in the Strategy.</u>
MM44	Paragraph 5.63	PC 66	Amend paragraph to read: An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road. Consideration of drainage patterns and flood risk from all sources would need to inform any subsequent layout. In addition, surface water attenuation measures and improvements to existing on-site water infrastructure would need to be provided to support a comprehensive development of the site. <u>Proposals will therefore need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters of layout and design.</u>
MM45	Add to beginning of para 5.64	PC 65	Add text to beginning of paragraph 5.64:

			<p>The site comprises historic field boundaries and has high archaeological value. It is adjacent to Trowbridge (Hilperton Road) Conservation Area and to Fieldways Highfield (Grade II* listed), a country house. Fieldways Highfield and its setting will need to be conserved in a manner appropriate to its significance. The relationship between development proposals and these heritage assets will need to be rigorously addressed through detailed design including provision for open greenspace in any layout. The layout and design of the site ...</p>
MM46	Paragraph 5.66	FMM 22	<p>Amend text as follows:</p> <p>In order to facilitate development a <u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at additional local schools, capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town in accordance with core policies of the Wiltshire Core Strategy.</u></p>
MM47	Figure 5.7	PC 63	Amend Figure 5.7 (see end of schedule – Map ‘H2.3: Elizabeth Way, Trowbridge’)
MM48	Insert new policy after Figure 5.8	FMM 23	<p>Insert new policy for H2.4 as follows:</p> <p><u>Land at Church Lane, as identified on the Policies Map, is allocated for development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 45 dwellings focused towards the north of the site;</u> • <u>sensitively designed vehicular access via a new junction arrangement off the A361 that incorporates discreet lighting, signage and boundary treatments to avoid unacceptable harm to heritage assets and their settings; and</u> • <u>improve cycling and walking routes through the site to link to the existing network, including links between the site, Southwick Country Park and the existing network, including footpath TROW8.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u> • <u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;</u> • <u>retention and enhancement of hedgerows and trees as part of wider landscaping and green infrastructure requirements, and the creation of a publicly accessible Green Infrastructure corridor along the Lambrok Stream to protect and enhance the character,</u>

			<p><u>biodiversity value and amenity of Southwick Country Park in conjunction with development at Southwick Court and Upper Studley;</u></p> <ul style="list-style-type: none"> • <u>sensitive design and layout, which ensures the significance of heritage assets and their settings, including the contribution made by the paddock adjacent to Church Lane, are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments; and</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site. Any cumulative issues associated with heritage, landscape, biodiversity and highway access should be considered on a comprehensive and consistent basis for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively addresses the urban edge of the town.</u></p>
MM49	Paragraph 5.68	PC 68 and FMM 24	<p>Amend paragraph 5.68 to read as follows</p> <p>Development proposals would need to ensure that the significance and setting of the Grade II Listed St John's Church would be appropriately protected. To achieve this objective, access to the site would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane. The site is adjacent to the Church of St John (Grade II listed), 344 Frome Road (Grade II Listed) and paddocks. There are key views across the site to St John's spire from Southwick Country Park. The site comprises the degraded fragmentary remains of a post medieval water meadow system. A comprehensive approach to development will need to be undertaken that makes a positive contribution towards conserving and enhancing the significance of heritage assets. Development should therefore avoid the paddock adjacent to Church Lane and the rear of listed buildings that front Frome Road. Access to the site must be sensitively designed and accommodated in manner that minimises harm to heritage assets. This would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane.</p>
MM50	Paragraph 5.67	PC 69	<p>Add text at the end of paragraph 5.67 as follows:</p> <p>...It is an open site that slopes to the south-west towards the Lambrok Stream. <u>As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change).</u> In</p>

			<u>addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the south-west margins of the site to slow the flow of surface water into the Lambrok Stream.</u>
MM51	Paragraph 5.69	FMM 25	Amend the paragraph as follows: ...Existing hedgerows and trees would need to be retained and enhanced through new landscaping features along the line of the Lambrok Stream. <u>The Lambrok Stream should be enhanced as a local amenity feature of the site in conjunction with development proposed at Southwick Court and Upper Studley.</u> Such features would need to be of sufficient scale to protect and enhance the character and amenity provided by Southwick Country Park. Links between the site, the Country Park and existing built form would be achieved through improvements to footpath TROW8.
MM52	Paragraph 5.70	FMM 26	Amend paragraph as follows: The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site <u>will be identified through survey and assessments guided by the requirements of the TBMS and include: Framfield; boundary hedgerows / tree lines; and the Lambrok Stream.</u>
MM53	Paragraph 5.71	FMM 27	Amend text of first sentence and add additional text to end of paragraph as follows: These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m) , dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. <u>The design and layout of development, including the size and location of landscape corridors, lighting and other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary. Development will be required to contribute towards the delivery of the Trowbridge Bat Mitigation Strategy.</u>
MM54	Paragraph 5.72	FMM 28	Amend text: In order to facilitate development a <u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at additional local schools, capacity. Funding contributions may also be sought</u>

			where needed to increase capacity at local GP surgeries and dentistry at the town <u>in accordance with core policies of the Wiltshire Core Strategy.</u>
MM55	Figure 5.6		Amend Figure 5.6 (see end of Schedule – Map ‘H2.4: Church Lane, Trowbridge’)
MM56	Insert new policy	FMM 29	<p>New policy for H2.5 as follows:</p> <p><u>Land at Upper Studley, as identified on the Policies Map, is allocated for development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 45 dwellings;</u> • <u>vehicular access via a new junction arrangement off the A361; and</u> • <u>improvements to cycling and walking routes through the site to link into the existing network.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate survey, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u> • <u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;</u> • <u>an attractive frontage to A361 and enhancement of this approach to the town;</u> • <u>retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, and the creation of a publicly accessible Green Infrastructure corridor along the Lambrok Stream to protect and enhance the character, biodiversity and amenity provided by Southwick Country Park in conjunction with development at Southwick Court and Church Lane; and</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site. Any cumulative issues associated with heritage, landscape, biodiversity and highway access should be considered on a comprehensive</u></p>

			<u>and consistent basis for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively addresses the urban edge of the town.</u>
MM57	Paragraph 5.73	PC 70	Amend first sentence of paragraph 5.73 to read: Approximately 2.33 <u>2.27</u> ha of land at Upper Studley is allocated for the development of approximately 20 <u>45</u> dwellings, as identified on the Policies Map.
MM58	Paragraph 5.73	PC 71	Add text to end of paragraph 5.73 as follows: <u>...The land slopes towards the stream and is bound to the south by tall, mature poplar trees. As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the southern margins of the site to slow the flow of surface water into the Lambrok Stream.</u>
MM59	Paragraph 5.74	FMM 30	Amend first sentence and add additional text to the end of the paragraph as follows: An objective of detailed design and layout will be to provide an attractive frontage to Firs Hill <u>the A361, and that enhances this approach to the town with vehicular access to the A361 along with cycling and walking routes into Trowbridge.</u> The existing natural features of the site are significant in the landscape and would be incorporated within a detailed layout and Lambrok Stream should be enhanced as a local amenity feature of the site in conjunction with development proposed <u>allocated</u> at Southwick Court <u>and Church Lane.</u>
MM60	Paragraph 5.76	FMM 31	Amend text of first sentence and add additional text to end of paragraph as follows: These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m) , dark (<1 lux) , continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats <u>The design and layout of development, including the size and location of landscape corridors, lighting and other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary. Development will be required to contribute towards the delivery of the Trowbridge Bat Mitigation Strategy.</u>

MM61	Insert new paragraph after 5.76	FMM 32	<p>Insert new paragraph as follows:</p> <p><u>The masterplan of the site and those prepared to guide the development of neighbouring sites H2.4 and H2.6 must take a joined-up approach towards addressing necessary infrastructure and cumulative issues associated with heritage, landscape, biodiversity and highway access through layout and design. Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</u></p>
MM62	<p>Insert new policy</p> <p>Figure 5.10</p>	FMM 33	<p>New policy for H2.6 as follows:</p> <p><u>Land at Southwick Court, as identified on the Policies Map, is allocated for development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 180 dwellings;</u> • <u>a sensitively designed vehicular access from the A361 and road across the site that minimises intrusion within the historic landscape. Signage should be kept to a minimum and particular attention given to reducing any adverse impacts of lighting;</u> • <u>a controlled emergency vehicular access; and</u> • <u>improvements to cycling and walking routes through the site to link in to the existing network.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>core bat habitat will be protected or enhanced. Design and layout will be informed by appropriate survey, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);</u> • <u>appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;</u> • <u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. New homes will be situated to the east of the Lambrok Stream and adjacent to the existing urban area in a manner that respects both the topography of the land and existing urban form to the immediate north. Land to the west of the Lambrok Stream will remain open and free from residential development. This shall be informed by appropriate heritage and archaeological assessments;</u> • <u>a comprehensive approach to landscaping to enhance the urban edge of the town and in so doing protect and enhance the setting of Southwick Court Farmstead;</u>

			<ul style="list-style-type: none"> • <u>retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, and the creation of a publicly accessible green corridor along the Lambrok Stream to protect and enhance the character and amenity provided by Southwick Country Park; and</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.</u> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site. Any cumulative issues associated with heritage, landscape, biodiversity and highway access should be considered on a comprehensive and consistent basis for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively addresses the urban edge of the town.</u></p>
MM63	Paragraph 5.78	PC 72 and FMM 34	<p>Amend paragraph 5.78 to read:</p> <p>The area is of historic significance as water meadows (non-designated heritage asset) associated with the Grade II* Listed Southwick Court Farmstead that lies to the south of the site. The Southwick Court Farmstead is a heritage asset of significant importance. It is a medieval, manorial farmstead that includes <u>a farmhouse, gatehouse and bridge juxtaposed with later post-medieval/modern additions surrounded by a moat.</u> An essential objective of detailed design will be to minimise harm to its significance. The setting to this heritage asset will be preserved, to the greatest extent possible, informed by the Councils Heritage Impact Assessment and the results of <u>further more detailed heritage assessment work to support any subsequent planning application. Heritage Impact Assessment.</u> Taking account of the weight attached to the significance of the assets, alone and in combination, any residual harm would require a clear and convincing justification <u>within any subsequent planning application</u> and should not be substantial. The social, environmental and economic advantages of the development, including the provision of homes along with significant improvements to biodiversity and provision of open space <u>will achieve substantial public benefits.</u> A <u>sensitively designed, comprehensive development scheme will need to minimise harm by ensuring ensure</u> that new homes are directed to the east of the Lambrok Stream and built in a manner that respects both the topography of the land and existing urban form to the immediate north. Land to the west may become either formal or informal open space or remain in agricultural use, but will not be developed for new homes. The character of the area will therefore help to retain the high significance of <u>Southwick Court and associated this heritage assets.</u> The strategy for accessing the site must respect the significance of Southwick Court and the wider historic landscape it occupies. The road across the site and junction off the A361 (Frome Road) will therefore need to be sensitively designed and built in a manner</p>

			<u>that acknowledges the requirement to minimise intrusion within the historic landscape. Signage and lighting will be kept to a minimum and particular attention given to reducing any adverse impacts of lighting throughout the development. In addition, the creation of any access specifically for emergency vehicles will need to be sensitively designed to ensure that the removal of any existing trees/hedgerows is kept to a minimum and must have regard to biodiversity, landscape and heritage assets.</u>
MM64	Paragraph 5.79	PC 73	Add text to end of paragraph 5.79, as follows: ...The Lambrok Stream and its respective flood plain should be enhanced as a local amenity feature of the site in conjunction with development proposed at Upper Studley above. <u>As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the northern margins of the site to slow the flow of surface water into the Lambrok Stream and associated field drainage systems.</u>
MM65	Paragraph 5.81	FMM 35	Amend text as follows: The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site <u>will be identified through survey and assessments guided by the requirements of the TBMS and include: boundary hedgerows / tree lines; Axe and Cleaver Lane; the Lambrok Stream; and the moat and grounds at Southwick Court.</u>
MM66	Paragraph 5.82	FMM 36	Amend text of first sentence and add additional text to end of paragraph as follows: These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m) , dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. <u>The design and layout of development, including the size and location of landscape corridors, lighting, other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary. Development will be required to contribute towards the delivery of the Trowbridge Bat Mitigation Strategy.</u>
MM67	Paragraph 5.84	FMM 37	Amend text:

			In order to facilitate development, a The masterplan of the site and those prepared to guide the development of neighbouring sites H2.4 and H2.5 must take a joined-up approach towards addressing necessary infrastructure and cumulative issues associated with heritage, landscape, biodiversity and highway access through layout and design. In order to facilitate development a Appropriate contributions would be likely to be sought to help fund an increase in capacity at additional local schools, capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town in accordance with core policies of the Wiltshire Core Strategy.
MM68	Paragraph 5.87	PC 75	Amend paragraph 5.87 as follows: Development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss/damage. However, the scale of development is within the thresholds set down in As such, a Nutrient Management Plan <u>seeks to for the river that</u> avoids the likelihood of adverse effects. Nevertheless, impacts are kept under review and this situation may change. <u>For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC.</u> Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in an annex to the Nutrient Management Plan.
MM69	New paragraph under 5.87	PC 74	Add new paragraph under 5.87 as follows: <u>Developments will be required to address any direct or indirect cumulative impacts on the A36.</u>
MM70	Policy H2.7 Figure 5.11 Paragraphs 5.88-5.92	FMM 38	Delete heading 'H2.7 East of Dene, Warminster' and Figure 5.11 'H2;7 East of the Dene, Warminster'. Delete Policy H2.7 and supporting paragraphs 5.88-5.92
MM71	Insert new policy Figure 5.12	FMM 39	Insert new policy for H2.8 as follows: <u>Land at Bore Hill Farm, as identified on the Policies Map, is allocated for development comprising the following elements:</u> <ul style="list-style-type: none"> • <u>approximately 70 dwellings;</u> • <u>vehicular access from Deverill Road;</u> • <u>B1 employment, located between the bio-digester and residential development; and</u>

			<ul style="list-style-type: none"> <u>improvements to cycling and walking routes through the site to link into existing network (including WARM60).</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> <u>noise, dust and odour assessments to inform design and layout to separate the built form and sensitive land uses from the adjoining waste management facility. Development will not be permitted where assessments conclude that a satisfactory living environment for future residents cannot be created.</u> <u>screening will be provided that has given due consideration to the operational waste management facility (bio-digester). Additional landscape screening at site boundaries to preserve the amenity of adjoining residential dwellings; and</u> <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site.</u> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></p>
MM72	Paragraph 5.94	PC 80	<p>Amend paragraph to read:</p> <p>The site is formed of land between the A36 and Deverill Road which lies adjacent to the Bore Hill Farm bio-digester. <u>Considering the site context, any subsequent development proposals (e.g. layout and screening) will need to take account of potential issues associated with the operational waste management facility, these may include: noise, dust and odour.</u> There is some limited screening on the north boundary with existing development at Bradley Close and Ludlow Close. Additional landscape screening at the site boundaries would be required to preserve and maintain the living conditions of adjoining residential dwellings. Vehicular access will be provided from Deverill Road, and connection to and improvement of public right of way WARM60 should be provided. <u>In addition, development proposals will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change).</u></p>
MM73	Paragraph 5.96	FMM 40	<p>Amend final sentence at end of paragraph as follows:</p> <p>Future development of the site shall be brought forward in such a way that ensures the residential and employment uses on the site are compatible. In line with WCS Core Policy 41, opportunities should be</p>

			<p>explored for new development to use energy generated by the adjoining biodigester. In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town. Appropriate contributions may also be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</p>
MM74	Figure 5.12	PC79	Amend Figure 5.12 (see end of schedule – Map 'H2.8: Bore Hill Farm, Warminster')
MM75	Insert new policy	PC 81 & PC 82 and FMM 41	<p>Insert new policy for H2.9 as follows:</p> <p><u>Land at Boreham Road, as identified on the Policies Map, is allocated for development comprising of the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 30 dwellings;</u> • <u>access will be provided from Boreham Road; and</u> • <u>improvements to cycling and walking routes through the site to link into the existing network including the reconstruction of pedestrian footways onto Boreham Road.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;</u> • <u>measures to safeguard protected species and habitats of importance for biodiversity, including the retention and enhancement of trees and hedgerows as wildlife corridors as informed by an ecological assessment; and</u> • <u>measures to protect the integrity of the River Avon SAC, with particular regard to phosphate discharge into the River Avon and its tributaries. This will be informed by appropriate survey and impact assessment; and</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site.</u> <p><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></p>

MM76	Paragraph 5.99	PC 81	<p>Amend paragraph to read:</p> <p>Whilst situated outside the Bishopstrow Conservation Area, the site is considered to lie within the setting of this designated heritage asset. Development of the site would therefore need to respond positively to its surroundings and have due regard to the special character or appearance of the Conservation Area. A Heritage Impact Assessment <u>In line with national policy, an assessment of heritage assets and their significance (including the contribution made by their setting) would be required in order to support any subsequent proposals, including the design of mitigation measures. The setting of heritage assets will be protected so as to ensure, as far as practicable, there will be no substantial harm to their significance.</u></p>
MM77	Paragraph 5.100	PC 82	<p>Delete paragraph 5.100 and replace with text to read:</p> <p>Development of the site would need to be supported and informed by a Drainage Strategy and water infrastructure capacity assessment. Where necessary, details relating to the reinforcement of existing foul/storm water drainage arrangements would need to be submitted with any subsequent planning application. Drainage measures for the attenuation and management of surface water would need to be capable of achieving greenfield, or better, infiltration rates. Parts of the site lie within Flood Zones 2 and 3. Therefore development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy and water infrastructure capacity assessment. Where necessary, details relating to the reinforcement of existing foul/storm water drainage arrangements will need to be submitted with any subsequent planning application.</p>
MM78	Paragraph 5.101	FMM 42	<p>Amend supporting text as follows:</p> <p>Vehicular access would be achieved from Boreham Road. Details relating to the provision of the junction arrangements; relocation of Grade II Listed milestone marker; culvert arrangements; closure of existing agricultural field gate and reconstruction of pedestrian footways onto Boreham Road would need to be submitted with any planning application. In order to facilitate development, a <u>Appropriate contributions would be likely be sought to help fund an increase in capacity at additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town. Appropriate contributions sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</u></p>
MM79	Insert new policy	FMM 43	<p>Insert new policy for H2.10 as follows:</p>

	Figure 5.14		<p><u>Land at Barthers Farm, as identified on the Policies Map, is allocated for development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 35 dwellings;</u> • <u>vehicular access from Cleyhill Gardens; and</u> • <u>improvements to cycling and walking routes through the site to link into the existing network including CHAP14.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>retention and enhancement of trees and hedgerows as part of wider landscaping and green infrastructure requirements;</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site;</u> • <u>an ecological assessment to inform design and layout of the development, along with on and off-site mitigation and monitoring measures as appropriate due to its location within the core buffer area of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC); and</u> • <u>an archaeological assessment to inform site layout.</u> <p><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></p>
MM80	Paragraph 5.103	PC 83 and PC 84	<p>Add text to the end of paragraph 5.103 to read:</p> <p>... impacting on ecological features such as Ancient Woodland that lies on the periphery of much of the settlement. <u>Public right of way CHAP14 runs along the northern boundary of the site. This will be retained and enhanced through the development of the site. Considering the size of the site, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.</u></p>
MM81	Insert new paragraph after 5.103	FMM 44	<p>Insert new paragraphs after paragraph 5.103 as follows:</p>

			<p><u>The site is within the core buffer area of the Bath and Bradford On Avon Bats Special Area of Conservation (SAC), as set out in Planning Guidance, and therefore there may be potential for bats to use the site and so mitigation measures such as new tree/hedgerow planting may be necessary. An ecological assessment will be required to identify potential impacts and set out appropriate mitigation. This may include the need to make financial contributions in relation to off-site mitigation measures. There is also potential for archaeological remains, therefore this too would need full assessment.</u></p> <p><u>Additional screening on the site boundaries will be required in order to preserve and maintain landscape quality and edge of settlement setting, and to protect the amenity of adjoining residential dwellings.</u></p> <p><u>In order to facilitate development, appropriate contributions would likely be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</u></p>
MM82	Policy H2.11 Figure 5.15 Paragraphs 5.104 to 5.107.	FMM 45	<p>Delete heading 'H2.11 The Street, Hullavington' and Figure 5.12 'H2.11 The Street, Hullavington',</p> <p>Delete Policy H2.11 and supporting paragraphs 5.104-5.107</p>
MM83	Insert new policy Figure 5.16	FMM 46	<p>Insert new policy for H2.12 as follows:</p> <p><u>Land to the east of Farrells Field, Yatton Keynell as identified on the Policies Map, is allocated for development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 30 dwellings;</u> • <u>vehicular access from B4039; and</u> • <u>improvements to cycling and walking routes through the site to link into the existing network.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>retention and enhancement of trees and hedgerows as part of wider strategic landscaping and green infrastructure requirements, incorporating open space provision;</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off site; and</u>

			<ul style="list-style-type: none"> • <u>an integrated water infrastructure strategy to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site.</u> <p><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></p>
MM84	Paragraph 5.109	PC 89 and FMM 47	<p>Amend supporting text after the first sentence of paragraph 5.109 as follows:</p> <p>...land, as shown on the Policies Map. <u>Considering the size of the site any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design. In addition, as the site lies within Groundwater Protection Zone 2 development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy. An integrated water infrastructure strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off-site. It is</u> The site is well located with regard to local services and facilities. The site It is in agricultural use and represents the continuation of recent development in this part of the settlement.</p>
MM85	Paragraph 5.110	PC 90	<p>Amend text to read:</p> <p>A woodland corridor along the western boundary should be retained as a wildlife corridor. Retention of the existing boundary vegetation...</p>
MM86	Paragraph 5.110	PC 91	<p>Amend text to read:</p> <p>...on site would provide screening to reduce the effect on adjacent visual receptors and be in keeping with the existing landscape character. Access would be taken from Farrell Fields and t <u>The possibility to link to adjacent footpaths should be explored.</u></p>
MM87	Add new paragraph after 5.110	FMM 48	<p>Insert new text after paragraph 5.110</p> <p><u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</u></p>

MM88	Figure 5.16	PC 88	Amend Figure 5.16 (see end of schedule – Map ‘H2.12: East of Farrells Field, Yatton Keynell’)
MM89	Housing Allocation H2.13	PC 92	Delete section titled ‘Malmesbury Community Area Remainder’ and ‘H2.13 Ridgeway Farm, Crudwell’. Delete Figure 5.17; delete paragraphs 5.111 to 5.114. Re-number subsequent paragraphs.
MM90	Insert new policy	FMM 49	<p>Insert new policy for H2.13 as follows:</p> <p><u>Land at Court Orchard/Cassways, as identified on the Policies Map, is allocated for development comprising of the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 35 dwellings;</u> • <u>vehicular access from B3098; and</u> • <u>improvements to cycling and walking routes through the site to link into the existing network including BRAT24 and BRAT25.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>development will be informed by an ecological assessment detailing suitable mitigation measures to ensure the safeguarding of protected species and habitats of importance for biodiversity;</u> • <u>retention and enhancement of trees and hedgerows on the site boundaries as part of wider landscaping and green infrastructure requirements. Development will be expected to take particular care to ensure that a suitable boundary with the open countryside is provided that protects or enhances landscape quality and the setting of the edge of the settlement;</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off site; and</u> • <u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments.</u> <p><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></p>

MM91	Paragraph 5.116	PC 94	Amend first sentence of paragraph 5.116 to read: ... Court Orchard/Cassways is allocated for the development of approximately 35 40 dwellings, as identified on the Policies Map.
MM92	Paragraph 5.117	FMM 50	Add additional text at end of paragraph as follows: The site comprises a roughly rectangular field that slopes down towards the north. The site is situated on the edge of Bratton and is within a Special Landscape Area. A part of the site also adjoins the Bratton Conservation Area. <u>In addition, due to the proximity of Bratton Camp Scheduled Monument and the prehistoric / medieval potential at this location, heritage and archaeological assessments will be required to support a planning application.</u>
MM93	Paragraph 5.119	FMM 51	Additional text added to paragraph as follows: Additional screening at the site boundaries would be required to preserve and maintain enhance the landscape quality, Conservation Area and edge of settlement setting, and to protect the amenity of adjoining residential dwellings. A new visual boundary to the settlement will need to be established along the site's western edge and new woodland planting will be a substantial part of a scheme. <u>This should respect the existing landscape value and character of the area, while ensuring a suitable transition between the village and open countryside.</u>
MM94	5.120	PC 95	Amend paragraph to read: Part of the site is susceptible to surface water flooding and a flood risk assessment will have to pay particular regard to this and inform the design of the site. <u>Considering the size of the site and the fact that part of the land is susceptible to surface water flooding, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.</u>
MM95	Insert new paragraph after 5.121	FMM 52	Insert new paragraph after paragraph 5.121 as follows: <u>Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.</u>

MM96	<p>Policy H3</p> <p>Table 5.4</p> <p>Paragraph 5.124</p>	PC 32 & PC 96 and FMM 53	<p>(PC32) Amend title in third column in Table 5.4 as follows:</p> <p>No of dwellings <u>Approximate number of dwellings</u></p> <p>Delete the title 'Policy H3' and the shaded text box but retain the rest of the information as supporting text as part of paragraph 5.124, as follows:</p> <p>Other allocations are made at Durrington, a Market Town with Amesbury and Bulford, to supports its role. <u>The following sites are allocated for development:</u></p> <p>Policy H3 Land is allocated for residential development at the following sites, as shown on the policies map:</p> <p>Table 5.4 Housing Allocations in the South Wiltshire Housing Market Area</p> <table border="1" data-bbox="754 624 1718 1318"> <thead> <tr> <th>Community Area</th> <th>Reference</th> <th>Site Name</th> <th>No of dwellings <u>Approximate number of dwellings</u></th> </tr> </thead> <tbody> <tr> <td rowspan="5">Salisbury</td> <td>H3.1</td> <td>Netherhampton Road, Salisbury</td> <td>640</td> </tr> <tr> <td>H3.2</td> <td>Hilltop Way</td> <td>10</td> </tr> <tr> <td>H3.3</td> <td>North of Netherhampton Road</td> <td>100</td> </tr> <tr> <td>H3.4</td> <td>Land at Rowbarrow</td> <td>100</td> </tr> <tr> <td><u>H3.5</u></td> <td><u>The Yard, Hampton Park</u></td> <td><u>14</u></td> </tr> <tr> <td rowspan="2">Amesbury</td> <td>H3.6</td> <td>Clover Lane, Durrington</td> <td>45</td> </tr> <tr> <td>H3.7</td> <td>Larkhill Road, Durrington</td> <td>15</td> </tr> </tbody> </table>	Community Area	Reference	Site Name	No of dwellings <u>Approximate number of dwellings</u>	Salisbury	H3.1	Netherhampton Road, Salisbury	640	H3.2	Hilltop Way	10	H3.3	North of Netherhampton Road	100	H3.4	Land at Rowbarrow	100	<u>H3.5</u>	<u>The Yard, Hampton Park</u>	<u>14</u>	Amesbury	H3.6	Clover Lane, Durrington	45	H3.7	Larkhill Road, Durrington	15
Community Area	Reference	Site Name	No of dwellings <u>Approximate number of dwellings</u>																											
Salisbury	H3.1	Netherhampton Road, Salisbury	640																											
	H3.2	Hilltop Way	10																											
	H3.3	North of Netherhampton Road	100																											
	H3.4	Land at Rowbarrow	100																											
	<u>H3.5</u>	<u>The Yard, Hampton Park</u>	<u>14</u>																											
Amesbury	H3.6	Clover Lane, Durrington	45																											
	H3.7	Larkhill Road, Durrington	15																											
MM97	Paragraph 5.128	PC 98	Amend 3 rd bullet point to read:																											

			<p>“Biodiversity: development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss / damage. However, the scale of development is within thresholds set down in a As such, the Nutrient Management Plan seeks to for the river that avoids the likelihood of adverse effects. Nevertheless, impacts are kept under review and this situation may change. <u>For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC.</u> Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in an annex to the Nutrient Management Plan.</p>
MM98	Policy H3.1	PC 102 and FMM 54	<p>Amend Policy H3.1 as follows:</p> <p><u>Approximately 63ha of Land at Netherhampton Road, as identified on the Policies Map, is proposed allocated for mixed-use development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 640 dwellings;</u> • <u>sensitively designed vehicular access from the A3094 Netherhampton Road with minimal signage and lighting to ensure views of Salisbury Cathedral spire are not subject to unacceptable harm;</u> • Land for employment (B1, B2 and B8 uses of the Use Classes Order) • <u>measures to positively support walking, cycling and public transport use between the site and Salisbury, including improvements to bridleway NHAM10;</u> • <u>at least 1.8ha of land for a two-form entry primary school along with playing pitches;</u> • <u>a local centre of an appropriate scale to provide local access to services and facilities; and</u> • <u>a Country Park of at least 10ha in size, located in the east and south of the site, with associated parking and facilities, provision of strategic landscaping and appropriately located public open space and green infrastructure throughout the rest of the site.</u> <p>Development will be subject to the following requirements:</p> <ul style="list-style-type: none"> • <u>design and layout to be guided by appropriate heritage and archaeological assessments;</u> • strategic landscaping and open space provision. All built development to be located below the 75m contour and a Country Park to be located in the east and south of the site; • <u>provision made for transport network improvements necessary to accommodate the scale of development envisaged, as identified through a comprehensive transport assessment;</u> • <u>Provision of sufficient school and contributions towards education and on or off-site healthcare capacity to meet the needs created by the development;</u>

			<ul style="list-style-type: none"> • measures to safeguard the interest of Harnham Hill Chalk Pit SSSI and Harnham Slope County Wildlife Site; • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design of the site so that surface water is controlled and does not exacerbate flooding off site;</u> • <u>measures to protect the integrity of the River Avon SAC, with particular regard to phosphate discharge into the River Avon and its tributaries. This will be informed by appropriate survey and impact assessment;</u> • <u>provision made for improvements to local sewerage systems, informed by a water infrastructure capacity appraisal; and</u> • <u>surface water management, to include comprehensive surface water drainage measures (including a sustainable drainage system), that achieves equivalent or less better than current greenfield rates of run-off.</u> <p><u>Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></p>
MM99	Paragraph 5.129	FMM 55	<p>Amend supporting text as follows:</p> <p>Approximately 63ha of land to the south of Netherhampton Road, as shown on the Policies Map, is allocated for development of approximately 640 dwellings, employment land and a new two-form of entry primary school and a local centre of an appropriate scale to provide local access to services and facilities, <u>including a convenience store and potentially healthcare facilities if provided on-site. An impact assessment will be required in line with Core Policy 38 of the Wiltshire Core Strategy.</u></p>
MM100	Paragraph 5.129	PC 99	<p>Amend 2nd and 3rd sentences of paragraph 5.129 to read:</p> <p>All built development will be below the 75 70m contour and a scheme will include a country park and extensive planting. Development of this site represents necessary growth to support the delivery of housing at Salisbury and thereby <u>contribute towards</u> maintain a 5-year housing land supply position within the South Wiltshire Housing Market Area.</p>
MM101	Paragraph 5.131	FMM 56	<p>Add new sentences at the end of the paragraph as follows:</p> <p><u>Development will also increase demand for primary health care facilities (GP services) in Salisbury. Additional provision would need to be provided to address limited capacity and support planned growth.</u></p>

			<u>This may be delivered on-site or off-site by funding contributions towards and/or provision of health facilities, in accordance with Core Policies of the Wiltshire Core Strategy.</u>
MM102	Paragraph 5.132	FMM 57	Delete paragraph as follows: The site will include an element of employment alongside other uses. Evidence does not suggest a specific quantum of employment land. The site has a strategic role as a possible destination for the relocation of businesses to allow the redevelopment of the Churchfields strategic allocation of the WCS. A scale and form of employment would be a matter for discussion with relevant stakeholders as a part of preparing a masterplan for the site but would be delivered in the form of serviced land.
MM103	Paragraph 5.134	FMM 58	Amend paragraph as follows: <u>The archaeological potential of the site is demonstrably high. The site includes prehistoric barrows, field systems and enclosures and very high archaeological potential. However, the site is large, and the exact extent of work is uncertain. At the planning application stage, the layout and design of the development will need to give great weight to conserving heritage assets and their setting in a manner proportionate to their significance. The site has been subject to archaeological assessment, geophysical survey and evaluation trenching, with archaeological interest shown to be present across the site. These investigations should inform a the masterplan for the site and an archaeological assessment would be required to support a subsequent planning application.</u>
MM104	Paragraph 5.138	PC 103	Amend paragraph to read: A water infrastructure capacity appraisal will be needed to confirm the scope and extent of works to service new development. This should include the capacity of local sewer systems. A detailed flood risk assessment would be required in order to identify a set of appropriate sustainable drainage measures. Bearing in mind the size of the site, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design. Sufficient land would need to be set aside for robust surface water management, to include a comprehensive Surface Water Drainage Scheme measures (including a Sustainable Drainage System) that results in run-off rates equalling, or greater than bettering current greenfield infiltration rates.
MM105	Insert new policy Figure 5.20	FMM 59	Insert new policy for H3.2 as follows: <u>Land at Hilltop Way, as identified on the Policies Map, is allocated for development comprising the following elements:</u>

			<ul style="list-style-type: none"> • <u>approximately 10 dwellings;</u> • <u>vehicular access via Hilltop Way; and</u> • <u>the public right of way forming the northern boundary of the site should be maintained and its route enhanced.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>identification and establishment of a suitable receptor site for the translocation of slow worms in the adjacent country park, to be agreed with the Council's ecologist. Development shall not take place until the receptor site has been agreed and translocation has taken place to the satisfaction of the Council's ecologist; and</u> • <u>appropriate location of new dwellings and high-quality design including landscaping and open space to mitigate impacts on skyline views.</u> <p><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></p>
MM106	Paragraph 5.141	FMM 60	<p>Amend paragraph text as follows:</p> <p>The site has been shown to have a high population of reptiles (Sslow Wworms) and these will need to be re-colonised on a suitable receptor site within the Country Park, prior to development taking place. It will be important to demonstrate that the mitigation proposals are consistent with Laverstock and Ford Parish Council's wider aims for the Country Park.</p>
MM107	Insert new policy	FMM 61	<p>Insert new policy for H3.3 as follows:</p> <p><u>Land North of Netherhampton Road, as identified on the Policies Map, is allocated for development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 100 dwellings;</u> • <u>vehicular access to the site from A3094 Netherhampton Road; and</u> • <u>improvements to cycling and walking routes through the site to link into the existing network.</u> <p><u>Development will be subject to the following requirements:</u></p>

			<ul style="list-style-type: none"> • <u>sensitive high-quality design and layout which ensures the significance of heritage assets and their settings are not subject to unacceptable harm, in particular the setting of Salisbury Cathedral spire. This will be achieved through:</u> <ul style="list-style-type: none"> ○ <u>the use of appropriate heritage and archaeological assessments to guide development;</u> ○ <u>a comprehensive approach to landscaping, green infrastructure and open space, including provision of an open corridor through the site to retain important views;</u> ○ <u>sensitive treatment of site boundaries. Development will be expected to take particular care to ensure a suitable boundary and transition between the open countryside and the City;</u> ○ <u>development which respects the scale, massing and built form of the local area and the setting of the Cathedral;</u> ○ <u>development along Netherhampton Road being set back, but providing an active frontage; and</u> ○ <u>sensitive use of lighting and signage with regard to infrastructure and highway elements throughout the development.</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design of the site so that surface water is controlled and does not exacerbate flooding off site;</u> • <u>no adverse impacts on the water quality of the River Avon SAC from surface water runoff during the construction and operational phases;</u> • <u>measures to protect the integrity of the River Avon SAC, with particular regard to phosphate discharge into the River Avon and its tributaries. This will be informed by appropriate survey and impact assessment;</u> • <u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments; and</u> • <u>provision made for transport network improvements necessary to accommodate the scale of development envisaged, as identified through a comprehensive transport assessment.</u> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></p>
--	--	--	---

MM108	Paragraph 5.143	PC 105 and FMM 62	<p>Amend paragraph text as follows:</p> <p>Land north of Netherhampton Road is allocated for the development of approximately 100 dwellings on 5.6ha of land as shown on the Policies Map. It is reasonably well located with regard to services and facilities. The site is well contained in terms of visual impacts on the wider landscape. The extent of possible flood risks areas will need to be carefully surveyed so that development avoids them. A detailed flood risk assessment would be required in order to identify a set of appropriate sustainable drainage measures. <u>The site is wholly located within Flood Zone 1, although its northern boundary is also the boundary to the adjacent area of land that lies within Flood Zone 2. Due to its size, development proposals will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy to address issues of surface water flooding and to ensure that, given the site's proximity to the River Avon and to Flood Zone 2, there are no adverse impacts on the water quality of the River Avon SAC from surface water runoff during the construction and operational phases.</u></p>
MM109	Paragraph 5.144	PC 104 and FMM 63	<p>Amend paragraph as follows:</p> <p>The area is sensitive in terms of the setting to the Cathedral and views towards it. Open space along the southern boundary will maintain views of the Cathedral spire travelling east. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Proposals would need to provide for high quality, sustainable development that enhances an important approach to the City and provides links to nearby rights of way.</p> <p><u>Long views to the historic City of Salisbury and Salisbury Conservation Area including the spire of Salisbury Cathedral (Grade I listed) are available across the site from the A3094, and at closer range from within the site itself. At the planning application stage, the layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting. Development proposals would need to be sensitively designed to ensure that views of the Spire are not significantly compromised. Design and layout would also need to positively address the objectives of the City of Salisbury Conservation Area Appraisal and Management Plan to minimise harm. Proposals would therefore need to provide for high quality, sustainable development that enhances an important approach to the City and provides links to nearby rights of way. To achieve these outcomes, development proposals will meet the development principles set out in policy. In addition, the design and layout of a scheme should positively respect the significance of heritage assets. This could be achieved through several measures including, for example:</u></p> <ul style="list-style-type: none"> • <u>the sensitive use of highway surfacing, materials, signage and lighting;</u>

			<ul style="list-style-type: none"> • <u>the use of focal buildings and appropriate features to define the transition from open countryside to urban form; and</u> • <u>a strategy for open space that could provide a heritage trail to link with existing footpaths in the area.</u>
MM110	Insert new paragraph after 5.144	FMM 64	<p>Insert new paragraph after 5.144 as follows:</p> <p><u>The site has been subject to archaeological assessment, geophysical survey and evaluation trenching, with archaeological interest shown to be present across the site. The archaeological potential of the site is demonstrably high. Development proposals will need to provide for a sensitive design and layout, that ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments.</u></p>
MM111	Paragraph 5.145	PC 106 and FMM 65	<p>Amend paragraph 5.145 as follows:</p> <p>...Funding contributions may also be sought where needed to increase capacity at local GP surgeries in the city, <u>in accordance with core policies of the Wiltshire Core Strategy. Transport assessment will be required to support any planning application and provision made for transport network improvements necessary to accommodate the scale of development.</u></p>
MM112	Insert new policy	FMM 66	<p>Insert new Policy H3.4 as follows:</p> <p><u>Land at Rowbarrow, as identified on the Policies Map, is allocated for development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 100 dwellings;</u> • <u>vehicular access from the Odstock Road to the west; and</u> • <u>improvements to cycling and walking routes through the site to link into the existing network.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;</u> • <u>a strong landscape framework that maintains and enhances the existing woodland belts, including open space provision in the southern part of the site and a green corridor extending along the southern boundary of the site from the existing beech tree shelterbelt;</u>

			<ul style="list-style-type: none"> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design of the site so that surface water is controlled and does not exacerbate flooding off site; and</u> • <u>provision made for transport network improvements necessary to accommodate the scale of development envisaged, as identified through a comprehensive transport assessment.</u> <p><u>Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.</u></p>
MM113	Paragraph 5.147	PC 110	<p>Amend paragraph to read:</p> <p>Development will need to preserve the contribution made by the site to the setting and therefore the importance of the Woodbury Ancient Villages Scheduled Monument. If necessary, land will need to be set aside from development. <u>In line with national policy, Detailed design and layout will be guided by an assessment of heritage assets and their significance (including the contribution made by their setting). Heritage Impact Assessment.</u> Scheduled monument consent will be required. The site also has high archaeological potential.</p>
MM114	Para 5.148	PC 109	<p>Amend paragraph 5.148 to read:</p> <p>This is a sloping and quite prominent site. In combination with Heritage Impact Assessment, development will need to take place within a strong landscape framework that maintains and enhances the existing woodland belts affecting the site. Containment provided by the beech shelterbelt on the southern boundary should extend as a green corridor from the end of the shelterbelt eastwards towards the existing Rowbarrow housing development and woodland around the Milk & More Salisbury Depot. <u>This green corridor should include copses, groups of trees and individual specimen trees. The arrangement of any proposed development and open space on the site should provide a setting for public rights of way in the area and maintain their views of the Salisbury cathedral spire and this could be achieved through careful street alignment and locating open space in the southern part of the site. The sloping buffer of land on the northern edge of the site should be enhanced with tree planting and the landscape buffer along Rowbarrow (road) retained.</u></p>
MM115	Paragraph 5.149	FMM 67	<p>Amend last sentence of paragraph as follows:</p> <p>In addition, <u>Appropriate contributions may also be sought where needed to increase capacity at local GP surgeries in the city, in accordance with core policies of the Wiltshire Core Strategy.</u></p>

MM116	Figure 5.22	PC 108	Amend Figure 5.22 (see end of Schedule - Map 'H3.4: Land at Rowbarrow, Salisbury')
MM117	Insert new site allocation and new policy after paragraph 5.149	FMM 68 and PC111	<p>After paragraph 5.149 add in new site allocation, as set out below:</p> <p>Insert new heading, <u>H3.5 The Yard, Hampton Park, Salisbury</u></p> <p>Insert new Policy H3.5 as follows:</p> <p><u>Land at The Yard, Hampton Park, as identified on the Policies Map, is allocated for development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 14 dwellings; and</u> • <u>vehicular access via the existing track onto Roman Road, with a new pedestrian and cycle access route provided through to Neal Close.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>landscaping strategy and infrastructure to ensure any development appears as a natural extension to Hampton Park. Hedgerows around the site should be maintained and enhanced where possible;</u> • <u>identification and establishment of a suitable receptor site for the translocation of slow worms in the adjacent country park, or other suitable location, to be agreed with the Council's ecologist. Development shall not take place until the receptor site has been agreed and translocation has taken place to the satisfaction of the Council's ecologist;</u> • <u>a Precautionary Working Method for birds, including barn owl; and</u> • <u>measures to address contamination as informed by an assessment of the sites condition.</u> <p><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></p>
MM118	New supporting text	PC 111 and FMM 69	<p>Insert supporting text as follows:</p> <p><u>The Yard, Hampton Park is allocated for the development of approximately 14 dwellings on approximately 1.31 ha of land as shown on the Policies Map. The site lies adjacent to the settlement boundary and existing residential development and would deliver a relatively small number of dwellings to help contribute towards the overall remaining indicative housing requirement for Salisbury.</u></p>

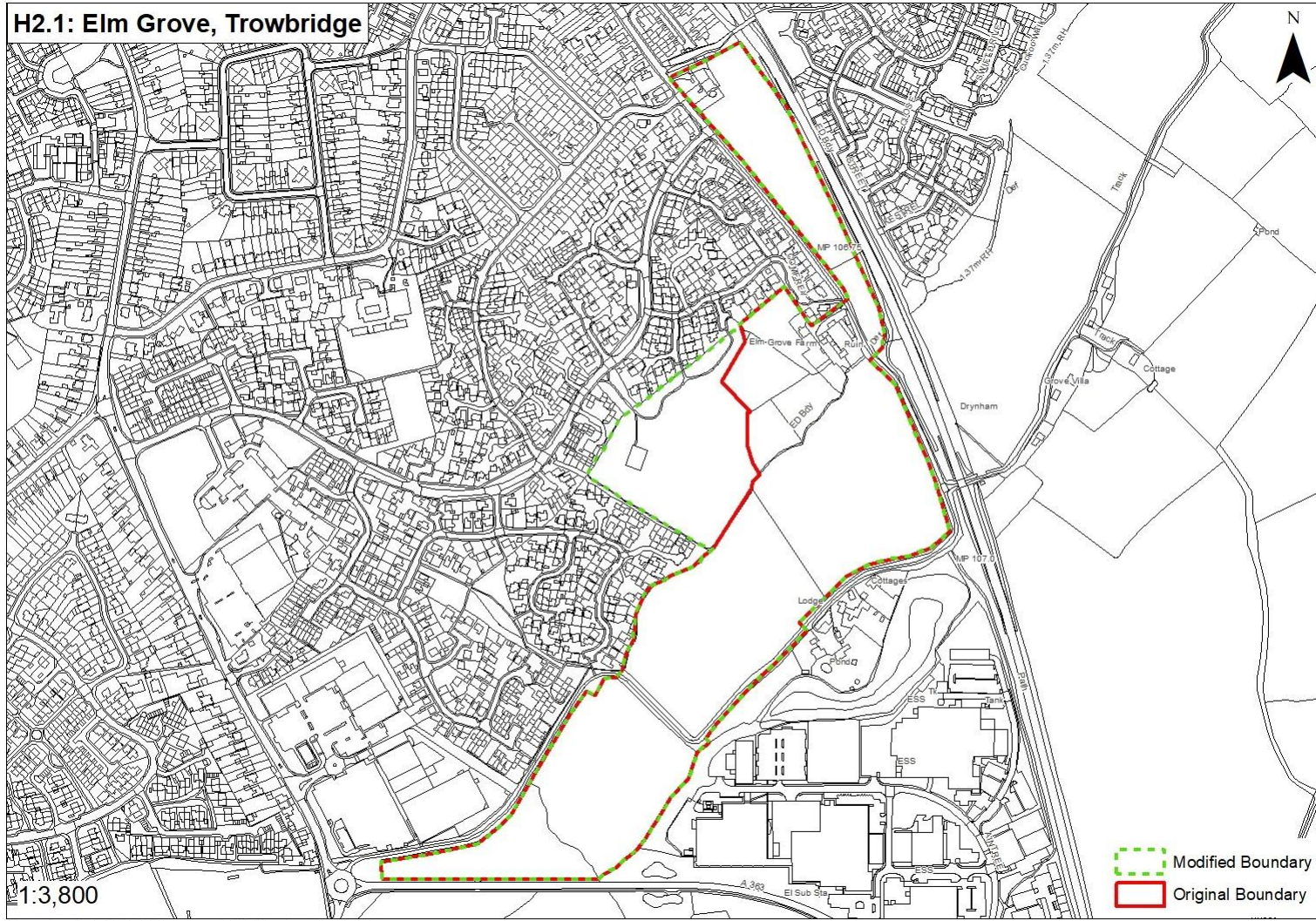
			<p><u>The site has previously been used for agricultural storage purposes, is fairly flat, and comprises small parcels of rough grassland and a large disused agricultural storage building. Access to the site would be achieved via Neal Close.</u></p> <p><u>This site is within the Special Landscape Area and in a rural fringe setting, adjacent to the Country Park. Access to the Country Park should be provided from this site and a robust landscape strategy and infrastructure is required to allow any development to appear as a natural extension to Hampton Park.</u></p> <p><u>Hedgerows around the site have the potential to be of importance for bat commuting and should be maintained where possible. There is a high population of slow worms to be translocated off site, which may be within the adjacent Country Park or other suitable location. Given the potential scale of the translocation, any receptor site will need to provide suitable habitat conditions for the species. Translocation shall not occur until a suitable receptor site has been secured and a scheme for this work is agreed with the Council ecologist through the planning application process. No development shall take place until the translocation scheme has been implemented in full. Consideration also needs to be given to the site's potential use as a roost site for barn owls through a Precautionary Working Method for birds.</u></p> <p><u>As this site has previously been used for agricultural storage purposes, an assessment of the history and current condition of the site to determine the likelihood of the existence of contamination arising from previous uses should be carried to inform the planning application.</u></p>
MM119	New site plan	PC 111	Insert new site figure (see end of schedule – Map 'H3.5: The Yard, Salisbury')
MM120	Paragraph 5.150	FMM 70	<p>Add additional text to end of paragraph as follows:</p> <p>...Provision of housing at Durrington would positively contribute towards the delivery of this objective by ensuring the viability of existing services and creating demand for an improved local offer. <u>Developers of the allocated sites will be expected to contribute financially towards capacity improvements in local schools and health care provision in accordance with core policies of the Wiltshire Core Strategy.</u></p>
MM121	Add new paragraph after Paragraph 5.152	PC 113	<p>Add new paragraph after Paragraph 5.152 to read:</p> <p><u>Development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss/damage. As such, a Nutrient Management Plan seeks to avoid the likelihood of adverse effects. Nonetheless, impacts are kept under review and this situation may change. For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC. Housing developers might consider how schemes can offset the additional phosphate loading resulting from new</u></p>

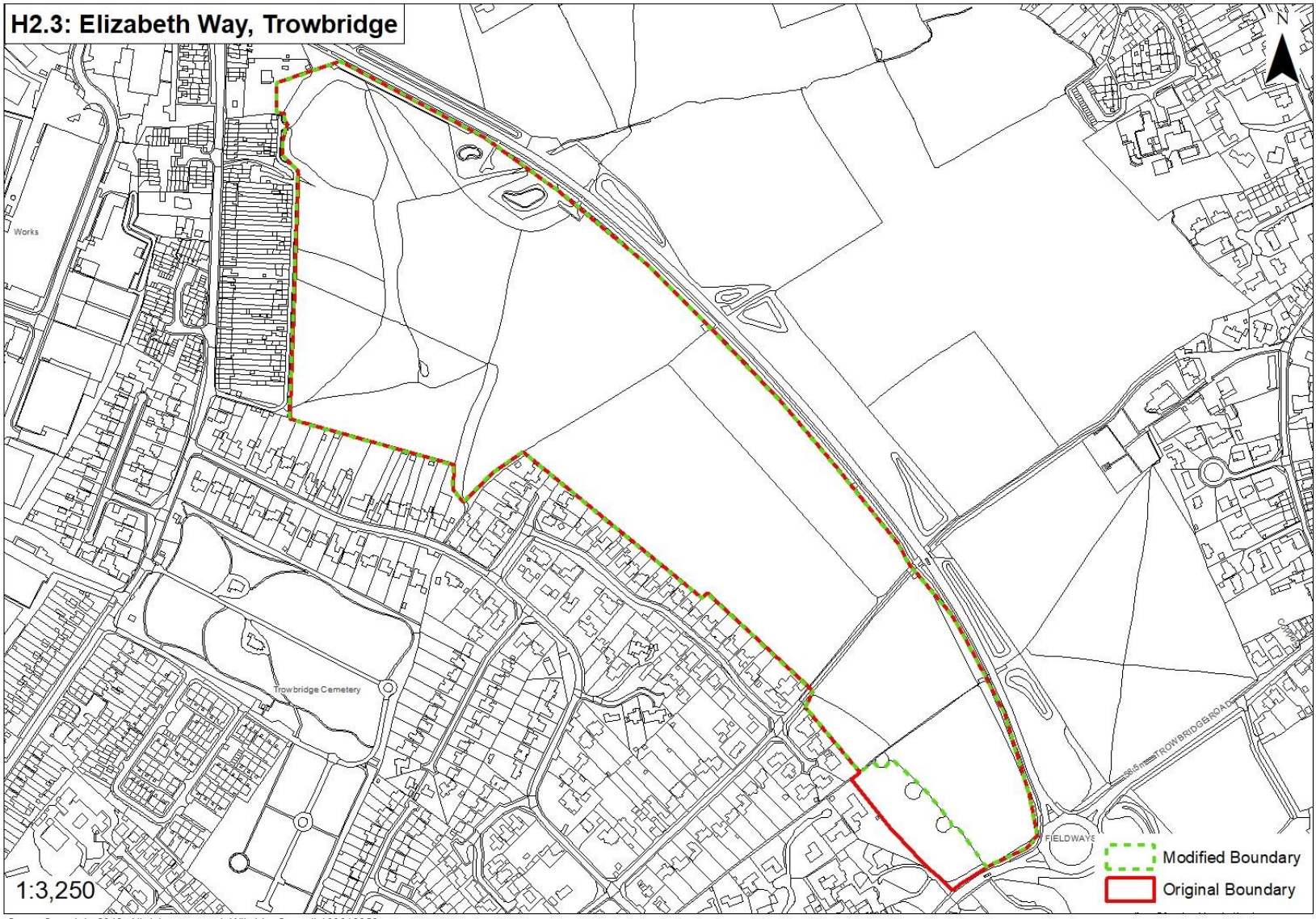
			<u>homes and specific measures will be set out in the annex to the Nutrient Management Plan.</u>
MM122	Insert new policy	FMM 71	<p>Insert new policy for H3.5 as follows:</p> <p><u>Land at Clover Lane, Durrington, as identified on the Policies Map, is allocated for development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 45 dwellings;</u> • <u>vehicular access from Clover Lane;</u> • <u>improvements to cycling and walking routes through the site to link into the existing network, including to High Street; and</u> • <u>incorporation of any rights of access to the paddock and stables to the north of the site.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>sensitive design and layout, which ensures the significance of designated and non-designated heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;</u> • <u>retention and enhancement of existing trees and hedgerows within extended green infrastructure corridors as part of wider landscaping to contribute to biodiversity, and provide appropriate screening to adjacent properties; and</u> • <u>a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site.</u> <p><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></p>
MM123	Paragraph 5.154	FMM 72	<p>Add additional text to end of paragraph as follows:</p> <p>Vehicular access would be from the existing residential road network using Clover Lane. Pedestrian and cycle permeability through the site must be incorporated in the layout, including a direct link for pedestrian and cycle access through to the High St. <u>Any access rights from High Street through to the stables and paddock adjacent to the site should be incorporated into the design and layout of the site.</u></p>

MM124	Paragraph 5.155	PC 115 and FMM 73	<p>Amend supporting text as follows:</p> <p>The site lies adjacent to the Durrington Conservation Area to the east and a number of Listed Buildings (<u>Durrington Manor, Grade II listed and The Red House, Grade II listed</u>) and <u>undesigned heritage assets (Manor Cottage and important cobb walls)</u>. Detailed design and layout would need to preserve or enhance the character <u>or appearance</u> of the Conservation Area and this is particularly important for the eastern portion of the site. Development should minimise the potential for harm to the significance of Listed Buildings and the Conservation Area <u>and should be designed in a sensitive and appropriate manner taking into consideration non-designated heritage assets, designated assets and objectives set out in the Durrington Conservation Area Appraisal. The cobb wall at the eastern boundary of the site will need careful consideration within the proposed layout. In line with national policy, detailed design and layout will be guided by an assessment of heritage assets and their significance (including the contribution made by their setting). Informed by a Heritage Impact Assessment these considerations should be resolved through the detailed design and layout of the scheme.</u></p>
MM125	Paragraph 5.156	PC 116 and FMM 74	<p>Amend paragraph as follows:</p> <p>There is a tree belt adjacent to the northern boundary of the site which is protected by a group Tree Preservation Order and there are substantial hedgerows to the western boundaries <u>and trees adjacent to the southern boundary at its eastern end</u>. Mature trees and hedgerows must be retained as important features of the site, and additional green infrastructure should be incorporated to enhance and protect these <u>existing features both within and adjacent to the site</u> in order to ensure a soft edge to the open countryside <u>maintain the role of the trees in contributing to biodiversity and the character of this part of Durrington</u> ensure a soft edge to the open countryside and to ensure appropriate screening between the new development and adjacent residential development and allotments. A layout can link into open space to the south east of the site.</p> <p><u>Considering the size of the site and history of surface water flooding on site and in the surrounding area, a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design will be required. In addition, as the site lies within Groundwater Protection Zone 1 development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy.</u></p>
MM126	Figure 5.23	PC 114	Amend Figure 5.23 (see end of schedule – Map 'H3.5: Clover Lane, Durrington')
MM127	Insert new policy	FMM 75	Insert new policy as follows:

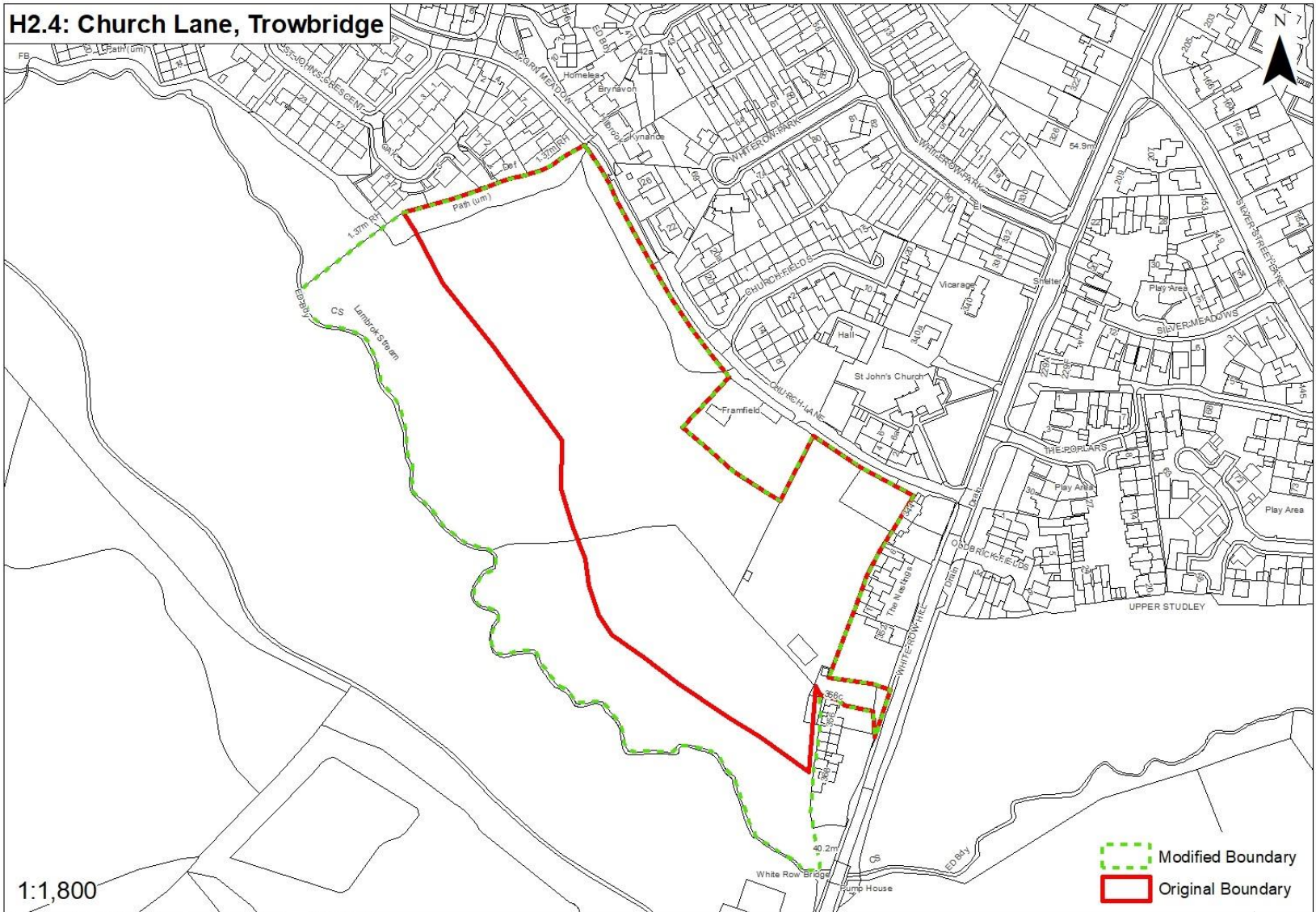
	Figure 5.24		<p><u>Land at Larkhill Road, Durrington, as identified on the Policies Map, is allocated for residential development comprising the following elements:</u></p> <ul style="list-style-type: none"> • <u>approximately 15 dwellings.</u> <p><u>Development will be subject to the following requirements:</u></p> <ul style="list-style-type: none"> • <u>sensitive design and layout, which ensures the archaeological potential of the site is addressed through the planning application process. This shall be informed by appropriate archaeological assessment; and</u> • <u>layout and design in line with character and pattern of frontage development on Larkhill Road, with gardens or open space to the south of the site serving as a soft edge to the countryside.</u> <p><u>Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.</u></p>
MM128	Paragraph 5.157	PC118	<p>Add new sentences to end of paragraph:</p> <p><u>As the site lies within Groundwater Protection Zone 1 development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy.</u></p>
MM129	New para after 5.158	FMM 76	<p>Insert new paragraph after paragraph 5.158:</p> <p><u>Due to the location in close proximity to the World Heritage Site, including Durrington Walls and Woodhenge, archaeological assessment will be required and must inform development proposals and any necessary mitigation.</u></p>

Inset Map Amendments



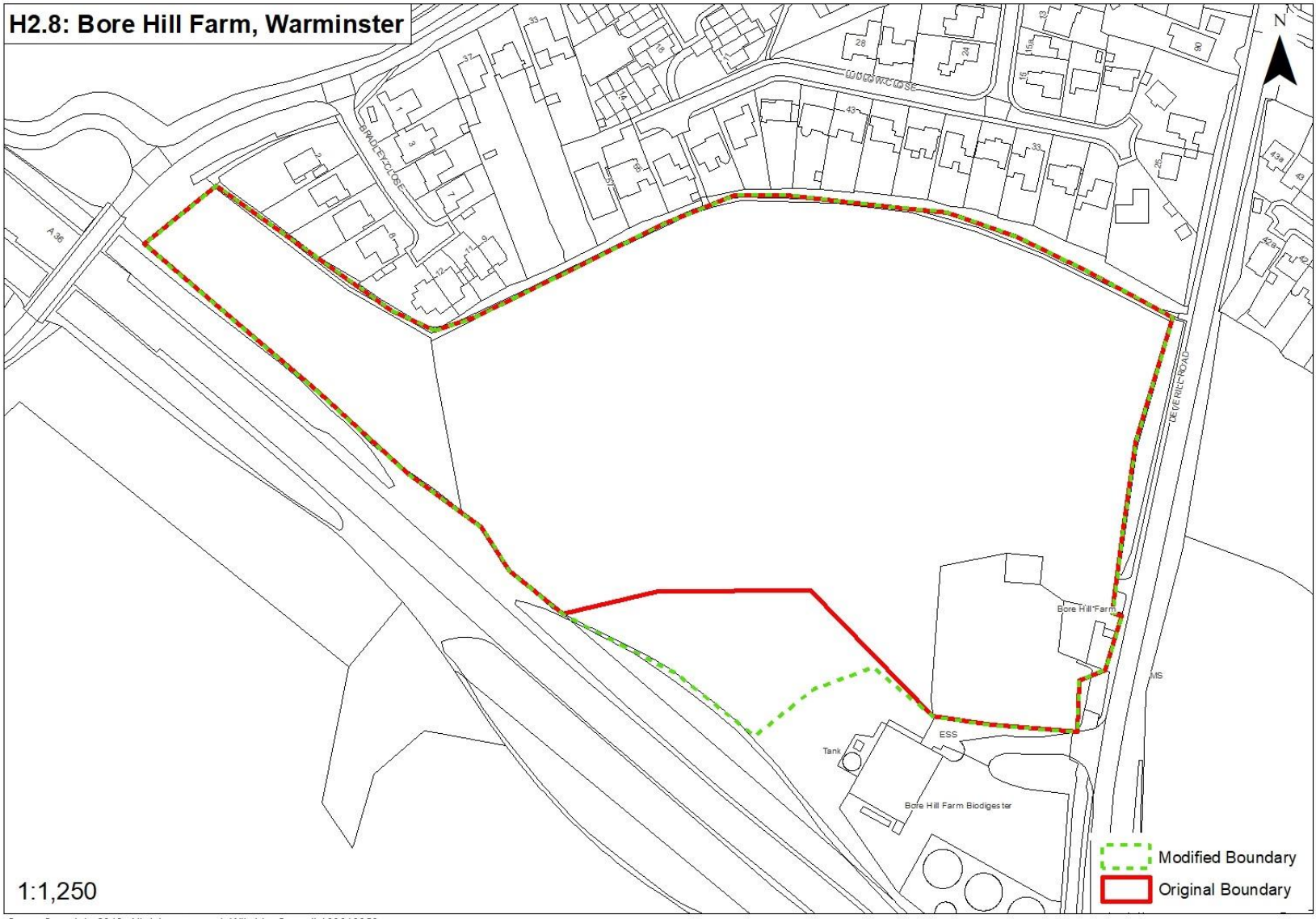


H2.4: Church Lane, Trowbridge



Crown Copyright 2018. All rights reserved. Wiltshire Council 100049050.

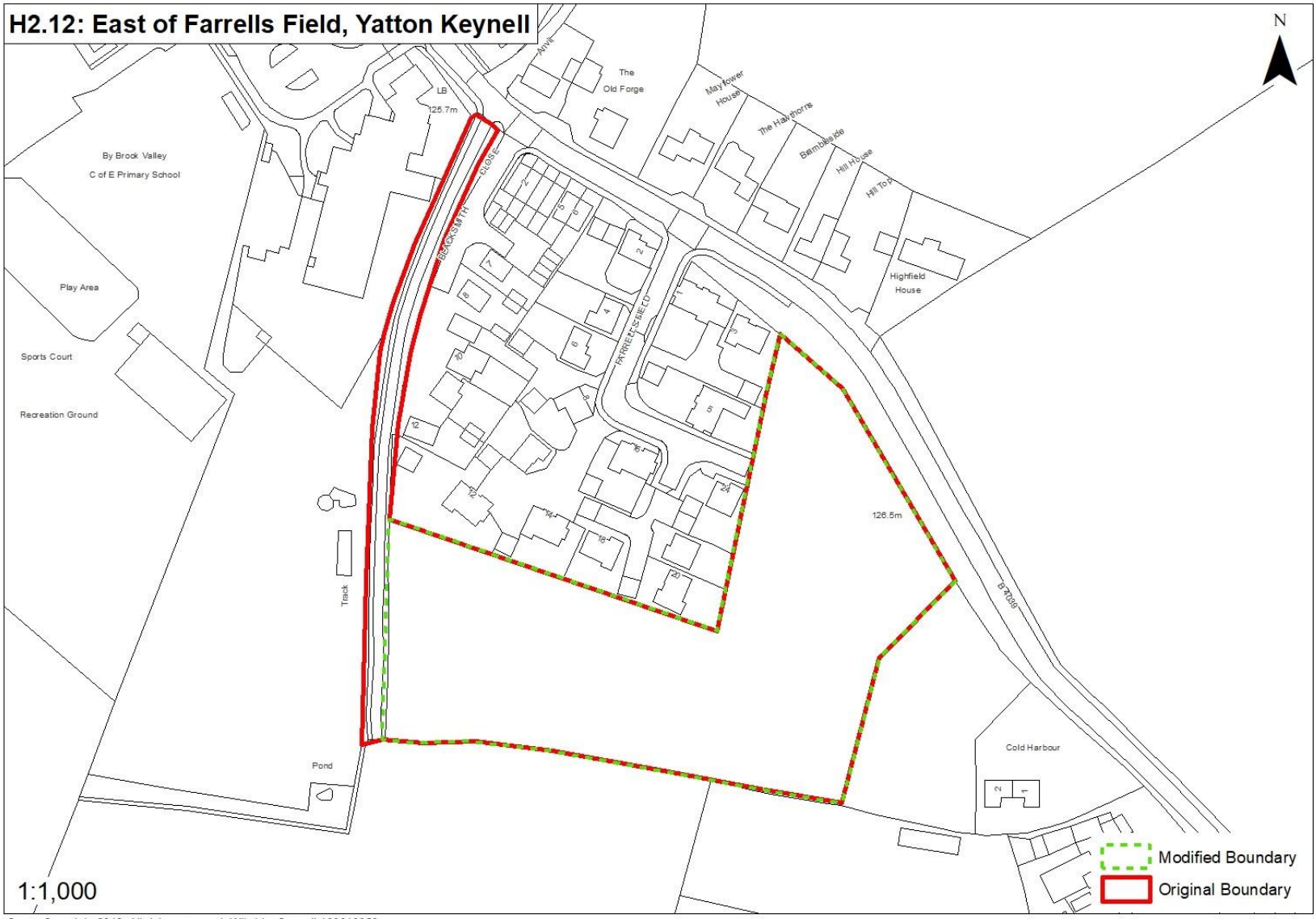
H2.8: Bore Hill Farm, Warminster



1:1,250

Crown Copyright 2018. All rights reserved. Wiltshire Council 100049050.

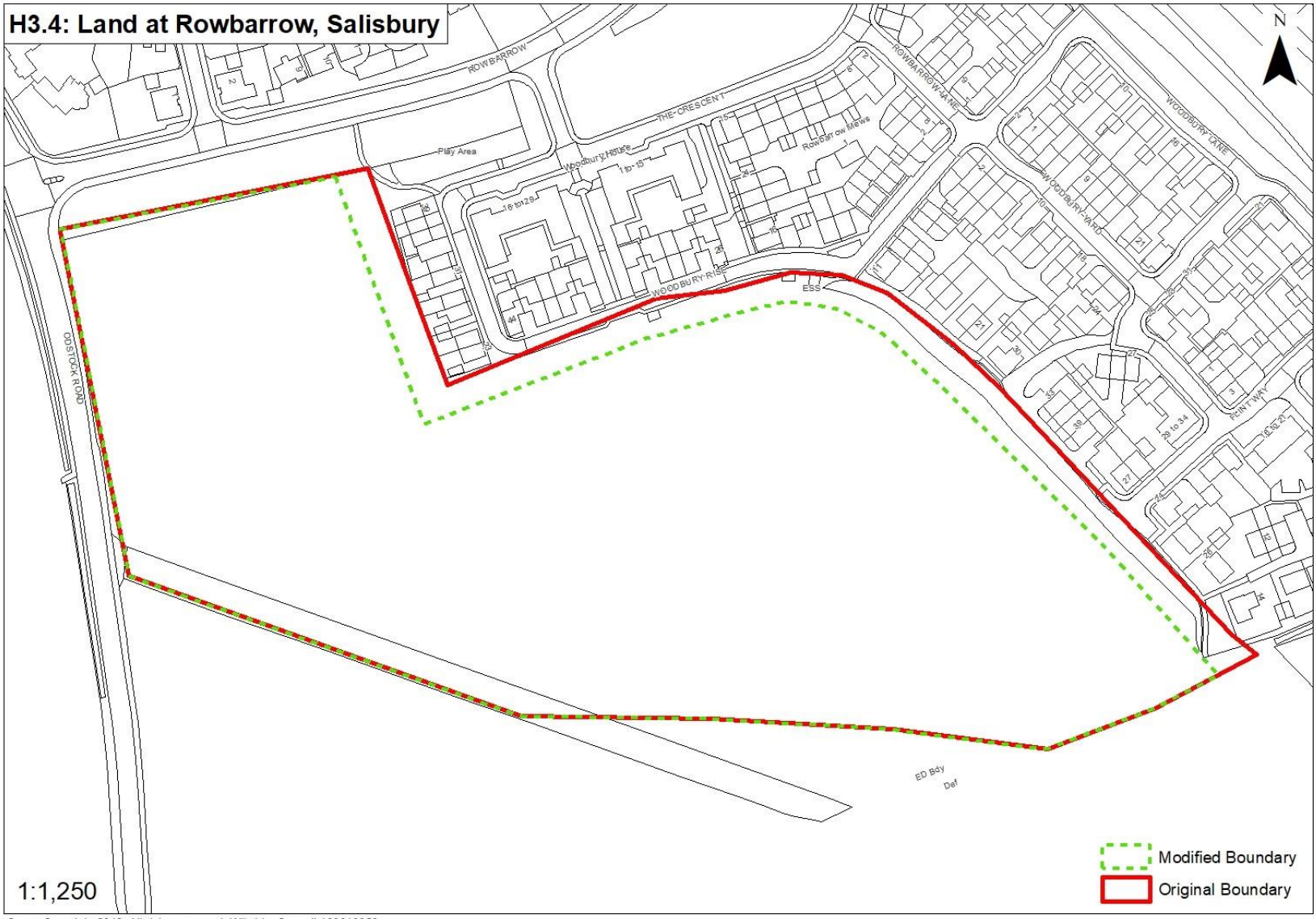
H2.12: East of Farrells Field, Yatton Keynell



1:1,000

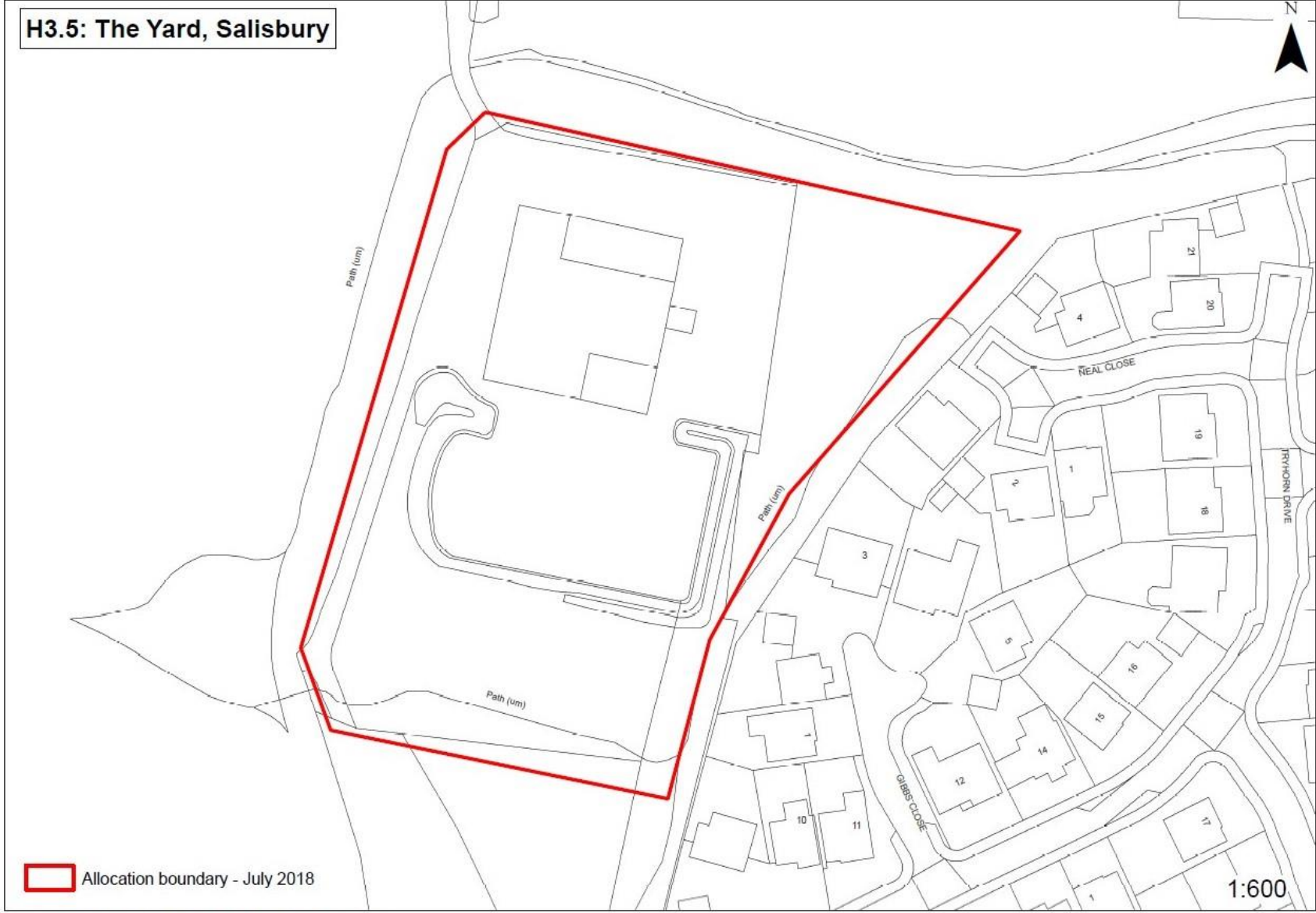
Crown Copyright 2018. All rights reserved. Wiltshire Council 100049050.

H3.4: Land at Rowbarrow, Salisbury



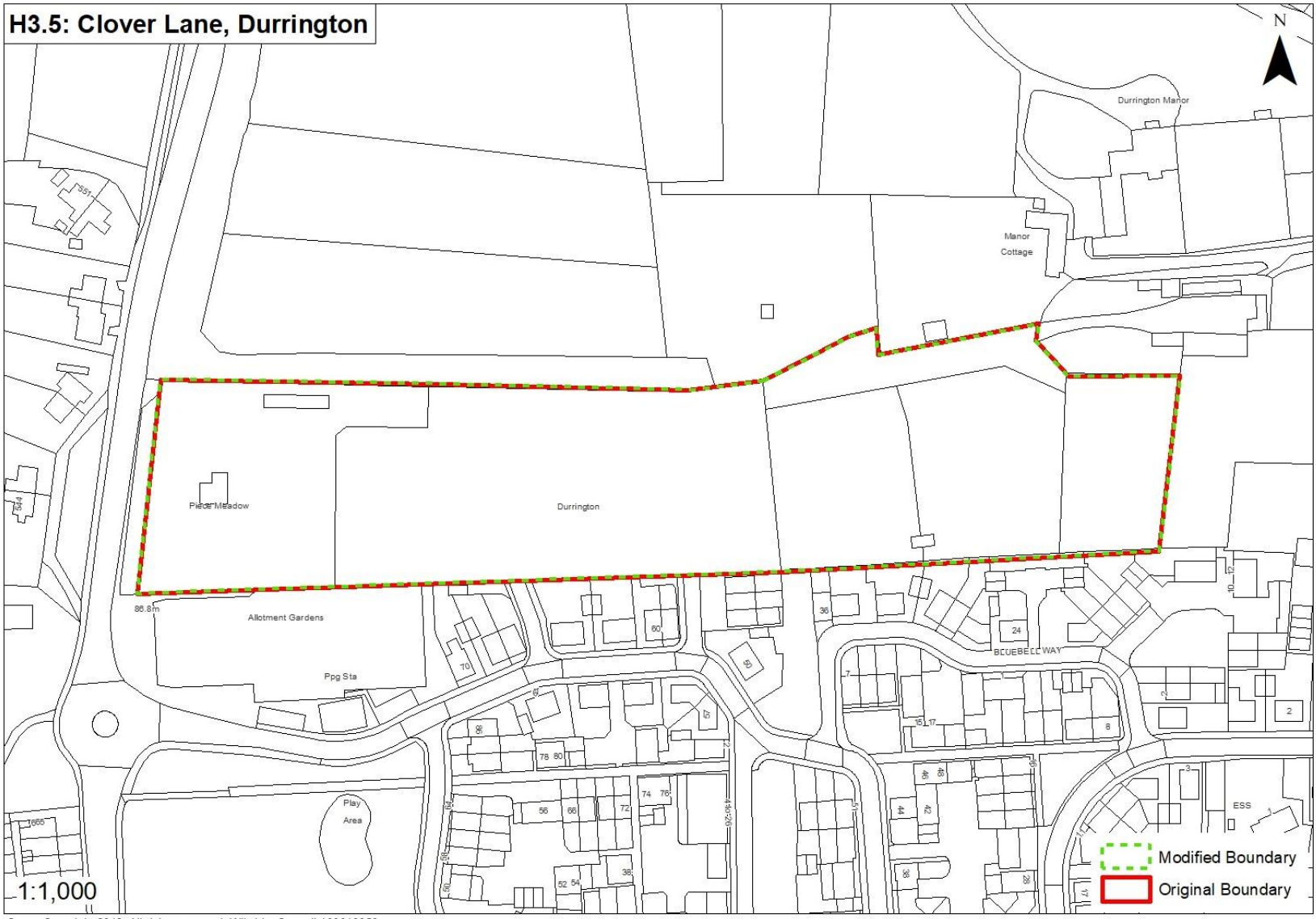
1:1,250

Crown Copyright 2018. All rights reserved. Wiltshire Council 100049050.



Crown Copyright 2018. All rights reserved. Wiltshire Council 100049050.

H3.5: Clover Lane, Durrington



Crown Copyright 2018. All rights reserved. Wiltshire Council 100049050.

Appendix 2: Schedule of Additional Minor Modifications

**Wiltshire Housing Site Allocations Plan
Schedule of Additional Modifications (January 2020)**

The Schedule sets out changes proposed to the Wiltshire Housing Site Allocations Plan Submission Document July 2018 (WHSAP 01.01).

The Additional Modifications (AM) set out in the following table have been identified as necessary to correct minor issues that do not have a material influence on the meaning or implementation of a policy and therefore do not constitute Main Modifications (MMs).

These final modifications are based on changes proposed previously and consulted on through the following documents¹ and take into account comments received through those consultations, the outcome of the Examination and any consequential changes necessary as a result of the Inspector's Main Modifications:

Proposed Changes (PC)	'EXAM. 01. 01 Schedule of Proposed Changes (Sept 18) (Parts 1 to 46)'. Consulted on from 27 Sept 2018 to 9 Nov 2018. And a further 'Focussed Consultation' from 11 Dec 2018 to 22 Jan 2019.
Further Main Modifications (FMM)	'EXAM 33 – WHSAP Schedule of FMM – Sep 2019 Consultation FINAL'. Consulted on from 12 Sept 2019 to 25 Oct 2019.
Additional Modifications (AM)	'Additional Modifications'. Set out in EXAM 33 – WHSAP Schedule of FMM – Sep 2019 Consultation FINAL', Appendix TWO. Consulted on from 12 Sept 2019 to 25 Oct 2019.

The modifications show the original submission text (struck through where it is deleted) with the final proposed change shown in **bold and underlined**.

Where part of the plan has been changed by a PC and also by an AM, only the resulting modification in relation to the Submission Version is shown. This means that in some cases the PC is not highlighted, however the reference number is provided.

¹ All documents available via the 'document library' at <https://cms.wiltshire.gov.uk/eccatdisplayclassic.aspx?sch=doc&cat=14020&path=14020>.

Consolidated List of Additional Modifications (AM) ref number	Submission Draft Plan reference	Reference Number of Proposed Change (PC) or Original Additional Modification (AM)	Proposed Change or Modification
AM 1	Paragraph 1.1	AM 1	Amend second bullet point of Paragraph 1.1 as follows: Allocate new sites for housing to ensure the delivery of homes across the plan period in order to help demonstrate a rolling five-year supply maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026.
AM 2	Paragraph 1.11		Amend first sentence of paragraph as follows: The Plan is is has been prepared under a legal 'duty to cooperate' requirement...
AM 3	Paragraph 1.14		Amend final sentence of paragraph as follows: A draft The SA Report has been published alongside the Plan ...
AM 4	Paragraph 1.15		Delete paragraph 1.15 as it relates to consultation instructions.
AM 5	Paragraph 1.16		Amend paragraph 1.16 as follows: On adoption, t The Wiltshire Policies Map has been will be amended to include the proposals allocations set out in Chapters 5 (Housing site allocations) and 6 (Settlement boundary review) the updated settlement boundaries ('the Limits of Development') set out in chapter 6 of this Plan. These proposals are set out in the Community Area Topic Papers which have been published as evidence to support this Plan.
AM 6	Paragraphs 1.17 – 1.25		Delete paragraphs 1.17 to 1.25 as these relate to consultation instructions.
AM 7	Paragraph 2.8, footnote		Amend footnote – to reflect the fact that in addition to 'inset maps' there is now an interactive policies map online.

AM 8	Paragraph 2.11		<p>Amend paragraph 2.11 as follows:</p> <p>An objective of the Plan is therefore to review and update existing sSettlement boundaries have been reviewed to ensure they are up-to-date and accurately reflect circumstances on the ground, derived on a consistent county-wide basis. In some circumstances, a review of boundaries has been carried out by Neighbourhood Plans, and will be in general conformity with the WCS. <u>In order that settlement boundaries remain up to date in that they reflect the existing built area, they will be reviewed periodically by Wiltshire Council and/or through neighbourhood plans, and the Policies Map will be updated accordingly.</u></p>
AM 9	Paragraph 3.4		<p>Amend paragraph as follows:</p> <p>The result of the review and proposed changes to settlement boundaries is discussed in Chapter 6 and shown in the appendix to the Plan, as well as in the Community Area Topic Papers.</p>
AM 10	Paragraph 3.8		Delete paragraph 3.8.
AM 11	Table 4.1	PC 3	Update Table 4.1 to reflect latest housing land supply figures as set out in full at Appendix A to this document.
AM 12	Paragraph 4.2	PC 4	<p>Amend the paragraph to read:</p> <p>The figures above <u>do not include windfall and</u> show a minimum to be allocated <u>that the Plan should aim to allocate</u>, but a surplus is necessary to maintain five years supply of housing land in each HMA and to surpass the buffer in excess of five years required by the NPPF.</p>
AM 13	Paragraph 4.3	PC 5	<p>Amend the paragraph to read:</p> <p>In order to deliver the spatial strategy, the priority for housing land allocations has been to focus on those higher tier settlements that have not yet met or contributed towards indicative levels of provision (Principal Settlements, <u>and</u> Market Towns and Local Service Centres)...</p>
AM 14	Paragraph 4.3	PC 6	<p>Amend final sentence of paragraph to read:</p> <p>This supports the sustainable development of the County sought by Objective 2 <u>3</u> of the Plan. These settlements where allocations are justified are:</p>

AM 15	Paragraph 4.5	PC 8	Amend the paragraph to read: No allocations are made at Local Service Centres or Large Villages in the East Wiltshire HMA because there is no strategic priority to do so due to the level of completions and supply committed within the HMA...
AM 16	Paragraphs 4.6 to 4.27		Delete paragraphs 4.6 to 4.27
AM 17	Paragraph 4.28		Amend paragraph 4.28 as follows: Each Community Area Topic Paper considers whether it is appropriate to allocate sites for housing development, based on the remaining requirements for that Community Area, and justifies the selection of particular sites. In summary the Plan allocates the following sites in each HMA.
AM 18	Table 4.7	PC 15, and further amendments consequential to Main Modifications	Update to Table 4.7 is set out in full at Appendix A.
AM 19	Paragraph 4.32	PC 16	Amend paragraph to read: Housing trajectories are site by site estimates of start and finish dates and annual completions. Aggregating housing trajectories for each HMA shows how the Plan helps to deliver in excess of five years supply of land in each area for the remaining years of the plan period. The table below provides estimates of how many years supply there will be in each remaining year of the plan period. It shows that supply exceeds the five-year requirement through to the end of the plan period for all years except one four in the South Wiltshire HMA and well before by then additional allocations will be included within the review of the WCS.
AM 20	Table 4.8	PC 17, and further amendments consequential to Main Modifications	Update to Table 4.8 is set out in full at Appendix A.
AM 21	Paragraph 4.34		Amend first sentence of paragraph as follows: The scale and distribution of sites options at each settlement is should also be consistent with that proposed by the spatial strategy in the WCS...

AM 22	Table 4.9	PC 18, and further amendments consequential to Main Modifications	Update to Table 4.9 is set out in full at Appendix A.
AM 23	Paragraph 4.39	PC 19	Amend paragraph to read: The overall pattern of growth is in general conformity with the WCS. It is consistent with the principles of the spatial strategy. Compared to indicative levels, development is focussed slightly more on the Market Towns (+4% <u>+7.2%</u>) and less on the rural settlements (-8% <u>-10.8%</u>).
AM 24	Paragraph 4.41	PC 20	Correct typo in the second sentence: ... two designated Large Villages: Collingbourne Ducis and Netheravob <u>n</u> .
AM 25	Table 4.10	PC 21, and further amendments consequential to Main Modifications	Update to Table 4.10 is set out in full at Appendix A.
AM 26	Paragraph 4.45	PC 22	Amend paragraph to read: There are marked differences in the anticipated growth of <u>many of the Market Towns in the HMA (including Calne, Malmesbury, Melksham and Bowerhill,</u> and Westbury) over the plan period compared to the two Principal Settlements of the HMA, Chippenham and Trowbridge.
AM 27	Paragraph 4.47	PC 23	Amend paragraph to read: In contrast, rates of development at most Market Towns have met expectations and at Bradford on Avon, Calne, Malmesbury, Melksham <u>and Bowerhill,</u> Royal Wootton Bassett and Westbury anticipated levels of growth have been exceeded over the first half of the plan period. Land has been available and some additional sites granted consent by planning appeals. Over the same interval, scales of development within rural areas in many places have also exceeded those anticipated by the WCS.
AM 28	Paragraph 4.49	PC 24	Amend paragraph to read:

			Chippenham however is now likely to exceed now has the potential to meet the minimum scale of growth anticipated in the WCS by delivery of higher rates of house building in the last half of the plan period compared to much lower rates over recent years. This will come about in large part as a result of significant allocations for housing development made in the Chippenham Site Allocations Plan <u>as well as other significant permissions at the town.</u>
AM 29	Paragraph 4.52		Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 1,050 dwellings. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,297.
AM 30	Paragraph 4.53	PC 26	Amend paragraph to read: “One main reason for a shortfall in land supply is the complexity and consequent delay developing Ashton Park, a south-eastern extension to the town. 4,600 1,350 dwellings will be built on this site in the plan period and a further 4,000 1,250 post-2026; rather than first envisaged that the whole of the allocation would have been completed in the plan period. This <u>broadly equates</u> can be seen to account for 1,000 of the 4,220 <u>1,297</u> dwelling shortfall.”
AM 31	Table 4.11	PC 27, and further amendments consequential to Main Modifications	Update to Table 4.11 is set out in full at Appendix A.
AM 32	Paragraph 4.63	PC 28	Amend the paragraph to read: The South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire.
AM 33	Paragraph 4.64	PC 29	Amend the paragraph to read: Salisbury is the Principal Settlement within the HMA. It is intended to be the primary focus for development, providing significant levels of jobs and homes. Two site allocations of more than 500 dwellings <u>provide a large source of supply</u> are important to ensuring there is a surety of supply to the end of the <u>Plan</u> period to ensure and that the City achieves the role set out in the spatial strategy: Churchfields <u>Fugglestone Red</u> and land at Netherhampton Road. The first is a strategic site allocated in the WCS. The latter of these, <u>land</u> at Netherhampton Road, is an allocation of the Plan.

AM 34	Paragraph 4.66	PC 30	<p>Amend paragraph to read:</p> <p><u>One of the WCS strategic allocations, namely</u> Churchfields, is a strategic mixed-use site that Core Policy 20 of the WCS requires to deliver 1100 dwellings by 2026. To be developed, this site requires substantial employment uses to decant and is now expected to commence later than envisaged and much less land for new housing will be available before <u>beyond the current plan period of 2026</u>. It is a complex regeneration project that will take time to deliver and will require other sites to enable existing businesses to relocate.</p>
AM 35	Paragraph 4.67		<p>Amend first section of paragraph as follows:</p> <p>The site at Netherhampton Road has the ability to address the lack of housing delivery at Churchfields, later within the plan period, and also the potential to provide employment land for Churchfields businesses to relocate, thereby freeing up land at Churchfields for housing delivery in the longer term. The WCS identifies the site within an area of search, to be considered if further land is required in future to meet housing requirements, as part of the Council's monitoring process.</p>
AM 36	Paragraph 4.68	PC 31	<p>Amend paragraph to read:</p> <p>Recognising the scale of the site, a generous lead in time is provided for the delivery of Netherhampton Road. The site is not expected to contribute to housing delivery for several years whilst work is carried out to masterplan the site and develop mitigation measures. In the meantime, supply from major schemes such as Fugglestone Red and Longhedge will ensure sufficient supply. Churchfields <u>Fugglestone Red</u> and the <u>Netherhampton Road sites</u> will deliver new homes alongside each other toward the end of the plan period.</p>
AM 37	Paragraph 5.3	AM 2 and AM 3	<p>Add text at the end of the second sentence, and at the end of the paragraph, as follows:</p> <p>Landscaping will be provided at boundaries and throughout each site retaining and reinforcing as much as possible of existing hedgerow and tree cover. This will often be required in order to establish a visual boundary to a settlement and so help preserve the settlement's character and appearance in the wider landscape as well as protect the amenity of adjoining uses, <u>as will tools such as Landscape and Visual Impact Assessment (LVIA) as part of the planning application process.</u> Core Policies 51 and 52 are particularly relevant (Landscape and Green Infrastructure). Some sites relate to Areas of Outstanding Natural Beauty and building design, layout and landscaping measures will be necessary to deliver a scheme which positively assimilates within the wider landscape setting and reflects the character of the local vernacular in accordance with requirements of Core Policy 51. <u>Moreover, in delivering high quality design, development of the allocated sites should take opportunities to improve cycling and walking connectivity in accordance with Core Policy 61.</u></p>

AM 38	Paragraph 5.5	PC 36	<p>Amend existing paragraph 5.5 to read:</p> <p>“Development has the potential to affect the significance of a range of heritage assets within or beyond site boundaries. The Council commissioned consultants to prepare a high-level Heritage Impact Assessment (HIA) to support the Plan. The HIA identifies and assesses the significance of heritage assets (and their settings) on sites where such matters will be particularly important considerations to address in subsequent planning applications. Where necessary, further, detailed, a site-specific heritage assessments will prescribe measures which will need to be incorporated as part of a scheme in order to protect them, including the importance of their settings. The determination of planning applications will follow the approach set out in National Planning Policy Framework (paragraphs 189-202)² and satisfy requirements of Core Policy 58 (Ensuring the Conservation of the Historic Environment) of the WCS. This should include archaeological assessment where necessary.”</p>																		
AM 39	Paragraph 5.12, Table 5.1	AM 4	<p>Delete paragraph 5.12 and Table 5.1 as follows:</p> <p>Sites are proposed at some settlements that involve a mix of uses more than housing development, and where development will be guided by a master plan. The master plan will show parameters governing the distribution of land uses for each site. These sites each have a detailed policy reflecting more extensive site specific requirements setting out the components of development and/or requirements to ensure it takes an acceptable form. These sites are:</p> <p>Table 4.1 Plan site specific policies</p> <table border="1" data-bbox="797 916 2058 1134"> <thead> <tr> <th>Community Area</th> <th>Site Name</th> <th>Policy</th> </tr> </thead> <tbody> <tr> <td>Tidworth</td> <td>Empress Way, Ludgershall</td> <td>H1.4</td> </tr> <tr> <td>Trowbridge</td> <td>Elm Grove Farm, Trowbridge</td> <td>H2.4</td> </tr> <tr> <td>Warminster</td> <td>East of the Dene, Warminster</td> <td>H2.7</td> </tr> <tr> <td>Chippenham</td> <td>The Street, Hullavington</td> <td>H2.10</td> </tr> <tr> <td>Salisbury</td> <td>Netherhampton Road, Salisbury</td> <td>H3.4</td> </tr> </tbody> </table>	Community Area	Site Name	Policy	Tidworth	Empress Way, Ludgershall	H1.4	Trowbridge	Elm Grove Farm, Trowbridge	H2.4	Warminster	East of the Dene, Warminster	H2.7	Chippenham	The Street, Hullavington	H2.10	Salisbury	Netherhampton Road, Salisbury	H3.4
Community Area	Site Name	Policy																			
Tidworth	Empress Way, Ludgershall	H1.4																			
Trowbridge	Elm Grove Farm, Trowbridge	H2.4																			
Warminster	East of the Dene, Warminster	H2.7																			
Chippenham	The Street, Hullavington	H2.10																			
Salisbury	Netherhampton Road, Salisbury	H3.4																			
AM 40	Paragraph 5.14	AM 5 and PC39	<p>Delete paragraph 5.14 and related footnote as follows:</p> <p>How these sites were selected is explained in the Community Area Topic Papers. ⁽⁴⁶⁾</p>																		

² Formerly paragraphs 131-135 of the NPPF 2012.

			⁴⁶Tidworth Community Area Topic Paper, Wiltshire Council, (June 2017) and Devizes Community Area Topic Paper, Wiltshire Council, (June 2017)
AM 41	Paragraph 5.41, footnote 18	PC 50	Delete paragraph 5.41 and related footnote as follows: How these sites were selected is explained in the Community Area Topic Papers (⁴⁸) ⁴⁸Trowbridge Community Area Topic Paper, Wiltshire Council (June 2017), Warminster Community Area Topic Paper, Wiltshire Council (June 2017), Chippenham Community Area Topic Paper, Wiltshire Council (June 2017), Malmesbury Community Area Topic Paper, Wiltshire Council (June 2017) and Westbury Community Area Topic Paper, Wiltshire Council (June 2017).
AM 42	Paragraphs 5.44, 5.49, 5.55, 5.62, 5.71, 5.76 and 5.82	PC52	Amend title of Trowbridge Recreation Management Mitigation Strategy, wherever it occurs, to read: <u>Trowbridge Bat Mitigation Strategy</u>
AM 43	Paragraph 5.46	AM 6	Delete the fifth sentence as follows: Consequently, development of the site would not lead to a significant encroachment of further built form into the countryside. In order to accommodate the educational needs of new development the site would accommodate a new primary school to serve the area alongside new housing. This with Development will include a multi-purpose community building geared toward use by sports and social groups in the area could provide a local centre to the development
AM 44	Paragraph 5.52	AM7 (PC59 superseded)	Amend first sentence as follows to reflect revised site area: Approximately 21.24 <u>20.52</u> ha of land to the south-west of the White Horse Business Park is allocated for the development
AM 45	Paragraph 5.58	PC 63	And first sentence of paragraph 5.58 to read: Approximately 46.33 <u>21.24</u> ha of land to the South West of Elizabeth Way is allocated for the development

AM 46	Paragraph 5.79	AM8	<p>Add the following text after the fifth sentence:</p> <p>...The Lambrok Stream and its respective flood plain should be enhanced as a local amenity feature of the site in conjunction with development proposed at Upper Studley above <u>and Church Lane.</u></p>
AM 47	Paragraph 5.93	PC 79	<p>Amend first sentence of paragraph 5.93 to read:</p> <p>Approximately 4.47 <u>4.83</u>ha of land at Bore Hill Farm/Bradley Road, as shown on the Policies Map....</p>
AM 48	Figure 5.16 Paragraph 5.109	PC 88	<p>Amend first sentence of paragraph 5.109 to read:</p> <p>Land East of Farrells Field, Yatton Keynell is allocated for the development of approximately 30 dwellings on approximately 4.3 <u>1.2</u> ha of land, as shown on the Policies Map.</p>
AM 49	Figure 5.18 Paragraph 5.116	AM 10	<p>Amend the boundary of the allocation as set out in Appendix B.</p> <p>Amend supporting text as follows:</p> <p>Approximately <u>1.61ha</u> 4.35ha of land at Court Orchard/Cassways is allocated for the development of ...</p>
AM 50	Paragraph 5.128	PC97	<p>Amend text to read:</p> <p>Transport: development inevitably has impacts on the local transport network. The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS. Plan allocations crystallise the pattern growth takes up to 2026 and refreshing the <u>refresh of the</u> Salisbury Transport Strategy (2018) will allow <u>has reviewed</u> the effectiveness of existing measures to be reviewed and proposes new ones to accommodate growth. Development will contribute to these wider network measures, where necessary, alongside measures that are implemented expressly as part of specific development proposals.</p>
AM 51	Para 5.136	PC 100	<p>Amend third sentence to read:</p> <p>To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy <u>Refresh (2018).</u></p>
AM 52	Para 5.137 2nd sentence	PC 101	<p>Amend second sentence to read:</p>

			This too would be undertaken in conjunction with an the updated Salisbury Transport Strategy refresh (2018) that takes account of planned strategic growth of Salisbury.
AM 53	Paragraph 5.146	PC 107	Amend paragraph 5.146 to read: Land at Rowbarrow is allocated for the development of approximately 100 dwellings on 5.56 6.4 ha of land as shown on the Policies Map.
AM 54	Paragraph 5.153	PC 114	Amend first sentence of paragraph 5.153 to read: Approximately 1.9 4.8 ha of land to the north of Clover Lane, Durrington is allocated for the development of approximately 45 dwellings, as identified on the Policies Map.
AM 55	Paragraph 6.1		Amend paragraph 6.1 as follows: The Council did not review the extent of the boundaries to inform the WCS and instead relied upon the former district local plans. They are have been reviewed as a part of preparing the Plan in line with the Plan Objective:
AM 56	Paragraph 6.3		Amend footnote 22, as follows: Settlement boundaries have been updated to take account of implemented planning permissions since up to April 2016 2017 .
AM 57	Paragraph 6.4		Amend final sentence of paragraph 6.4 (to include a footnote) as follows: It is also the prerogative of local communities to review Settlement Boundaries through neighbourhood planning. Neighbourhood Plans are required to be in general conformity with the WCS. Paragraphs 4.13 and 4.15 of the WCS support the review of settlement boundaries through the Plan or through neighbourhood plans. Therefore, where a neighbourhood plan has been considered to have reviewed the settlement boundary and is at a sufficiently advanced stage[INSERT FOOTNOTE: A neighbourhood plan is considered to be at an advanced stage once it has been submitted (Regulation 15 / 16 according to the Neighbourhood Plan (General) Regulations 2012 (as amended))], then it is unnecessary to duplicate this work by reviewing the relevant settlement boundary in the Plan.
AM 58	Paragraph 6.5		Amend paragraph 6.5 as follows: Neighbourhood plans were are considered to have reviewed their settlement boundaries where the issue has been explicitly addressed through the neighbourhood plan process, even if the eventual outcome is to retain the existing settlement boundary. Generally, when a neighbourhood plan submitted to the Council has reviewed a settlement boundary and proposes amendments, the Plan has not carried out a second

			review of the boundaries. Individual community area topic papers identify those settlements where the settlement boundary has been reviewed by a sufficiently advanced neighbourhood plan.
AM 59	Paragraph 6.6		Delete paragraph 6.6.
AM 60	Paragraph 6.8 and 6.9		Delete paragraphs 6.8 and 6.9.
AM 61	Tables 6.1 to 6.3		Delete Tables 6.1 to 6.3.
AM 62	Throughout	Consequential change to Main Modifications and Additional Modifications	Adjust table of contents, headings and numbering of sections, paragraphs and policies to reflect modifications.

Appendix A

Proposed Changes to figures in Section 4: Housing Delivery Strategy³

AM 11: Amendments to Table 4.1 to reflect latest housing figures at July 2018 (as per PC3):

Housing Market Area	Minimum housing requirement	Completions 2006-2017	Developable commitments 2017-2026	Minimum to be allocated
East Wiltshire HMA	5,940	3,497 <u>3,624</u>	2,273 <u>2,311</u>	470 <u>5</u>
North & West Wiltshire HMA	24,740	42,603 <u>13,025</u>	41,566 <u>10,606</u>	574 <u>1,109</u>
South Wiltshire HMA	10,420	5,067 <u>5,388</u>	4,759 <u>3,701</u>	594 <u>1,331</u>

AM 18: Amendments to Table 4.7: As per PC15, to reflect updated housing supply figures as at July 2018, and also to reflect amended capacities / densities on housing allocations at Trowbridge (PC55, PC60, PC64 and PC70) and at Bratton (PC94), removal of allocations at Market Lavington (PC46, PC47 and PC48), Crudwell (PC92), H2.7 East of the Dene, Warminster (FMM38) and H2.11 The Street, Hullavington (FMM 45) and addition of a new housing allocation at Salisbury (PC111).

Housing Market Area (HMA)	Minimum Housing Requirement	Completed 2006-2017	Commitments 2017-2026	Windfall Allowance (2017-2026)	Plan Allocations 2017-2026	TOTAL	Surplus
East Wiltshire	5,940	3,497 <u>3,624</u>	2,273 <u>2,311</u>	811 <u>823</u>	244 <u>161</u>	6,822 <u>6,919</u>	882 <u>979</u>

³ Source documents: TOP/03C: Topic Paper 3 – Housing Land Supply Addendum (July 2018); Wiltshire Council Housing Land Supply Statement, published August 2019 (April 2018 base date) and TPO/04C: Topic Paper 4: Addendum: Developing Plan Proposals Submission Version July 2018.

North and West Wiltshire	24,740	42,603 13,025	41,566 10,606	2,086 2,209	4,195 1,103	27,450 26,943	2,710 2,203
South Wiltshire	10,420	5,067 5,388	4,759 3,701	736 743	795 804	11,357 10,636	937 216

AM 20: Amendments to Table 4.8; As per PC17, to reflect updated housing supply figures as at July 2018, and also to reflect amended capacities / densities on housing allocations at Trowbridge (PC55, PC60, PC64 and PC70) and at Bratton (PC94), removal of allocations at Market Lavington (PC46, PC47 and PC48), Crudwell (PC92), H2.7 East of the Dene, Warminster (FMM38) and H2.11 The Street, Hullavington (FMM 45) and addition of a new housing allocation at Salisbury (PC111).

HMA	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East Wiltshire	9.18 8.54	9.14 8.81	9.75 9.64	12.20 10.77	22.44 14.98	20.18 14.62	14.04 12.89	9.84 11.50	7.45 8.23
North and West Wiltshire	7.15 6.15	7.54 6.66	7.64 6.85	7.54 6.87	7.85 6.95	7.92 6.95	7.48 6.76	6.54 6.21	5.30 5.38
South Wiltshire	6.09 5.70	6.30 5.95	6.43 5.75	6.65 5.57	6.88 5.46	7.13 5.14	6.70 4.19	5.87 3.25	4.75 2.42

AM 22: Amendments to Table 4.9: As per PC18, to reflect updated housing supply figures as at July 2018, and also to reflect the removal of allocations at Market Lavington (PC46, PC47 and PC48)

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
Urban areas					
Devizes	2,010	1,447 1,501	689 612	2,136 2,113	6.3 5.1%
Marlborough	680	357 397	306 304	663 701	-2.6 3.1%

Tidworth and Ludgershall	1,750	728 767	1,409 1,177	1,836 1,944	5.0 11.1%
TOTAL	4,440	2,532 2,665	2,103 2,093	4,635 4,758	4.4 7.2%
Rural areas					
Devizes CA remainder	490	286 297	182 112	468 409	-4.5 -16.5%
Marlborough CA remainder	240	160 157	46 52	206 209	-14.1 -12.9%
Pewsey CA	600	426 416	179 192	605 608	0.9 1.3%
Tidworth CA remainder	170	93 89	3 23	96 112	-43.5 -34.1%
TOTAL	1,500	965 959	410 379	1,375 1,338	-8.3 -10.8%

AM 25: Amendments to Table 4.10: As per PC21, factual update to reflect the latest housing figures (as at July 2018) and to reflect amended capacities / densities on housing allocations at Trowbridge (PC55, PC60, PC64 and PC70) and at Bratton (PC94) and removal of housing allocations at Crudwell (PC92), H2.7 East of the Dene, Warminster (FMM38) and H2.11 The Street, Hullavington (FMM 45).

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
Urban areas					
Bradford on Avon	595	387 384	212 218	599 602	1%
Calne	1,440	961 1,034	807 847	1,768 1,881	23 31%
Chippenham	4,510	1,204 1,230	3,819 3,016	5,023 4,246	11 -6%
Corsham	1,220	646 597	587 629	1,233 1,226	4 0%
Malmesbury	885	560 657	455 385	1,015 1,042	15 18%

Melksham and Bowerhill	2,240	1,370 1,445	1,224 1,113	2,594 2,558	16 14%
Royal Wootton Bassett	1,070	997 1,014	458 140	1,155 1,154	8%
Trowbridge	6,810	2,965 3,019	2,625 2,494	5,590 5,513	-18 -19%
Warminster	1,920	603 615	1,055 1,040	1,658 1,655	-14%
Westbury	1,500	877 940	934 851	1,808 1,791	24 19%
TOTAL	22,190	10,570 10,935	11,874 10,733	22,444 21,668	4 -2%
Rural areas					
Bradford on Avon CA remainder	185	119 123	72 56	194 179	3 -3%
Calne CA remainder	165	92 96	153 171	245 267	49 62%
Chippenham CA remainder	580	409 419	113 116	522 535	-10 8%
Corsham CA remainder	175	255 285	96	354 381	104 118%
Malmesbury CA remainder	510	336 340	144 170	480 510	-6 0%
Melksham CA remainder	130	104 115	38 44	139 159	7 22%
Royal Wootton Bassett and Cricklade CA remainder	385	315 305	150 177	465 482	24 25%
Trowbridge CA remainder	165	255 256	23 32	278 288	69 75%
Warminster CA remainder	140	90 91	53 68	143 159	2 14%
Westbury CA remainder	115	64 60	47 46	108 106	-6 -8%
TOTAL	2,550	2,033 2,090	890 976	2,923 3,066	15 20%

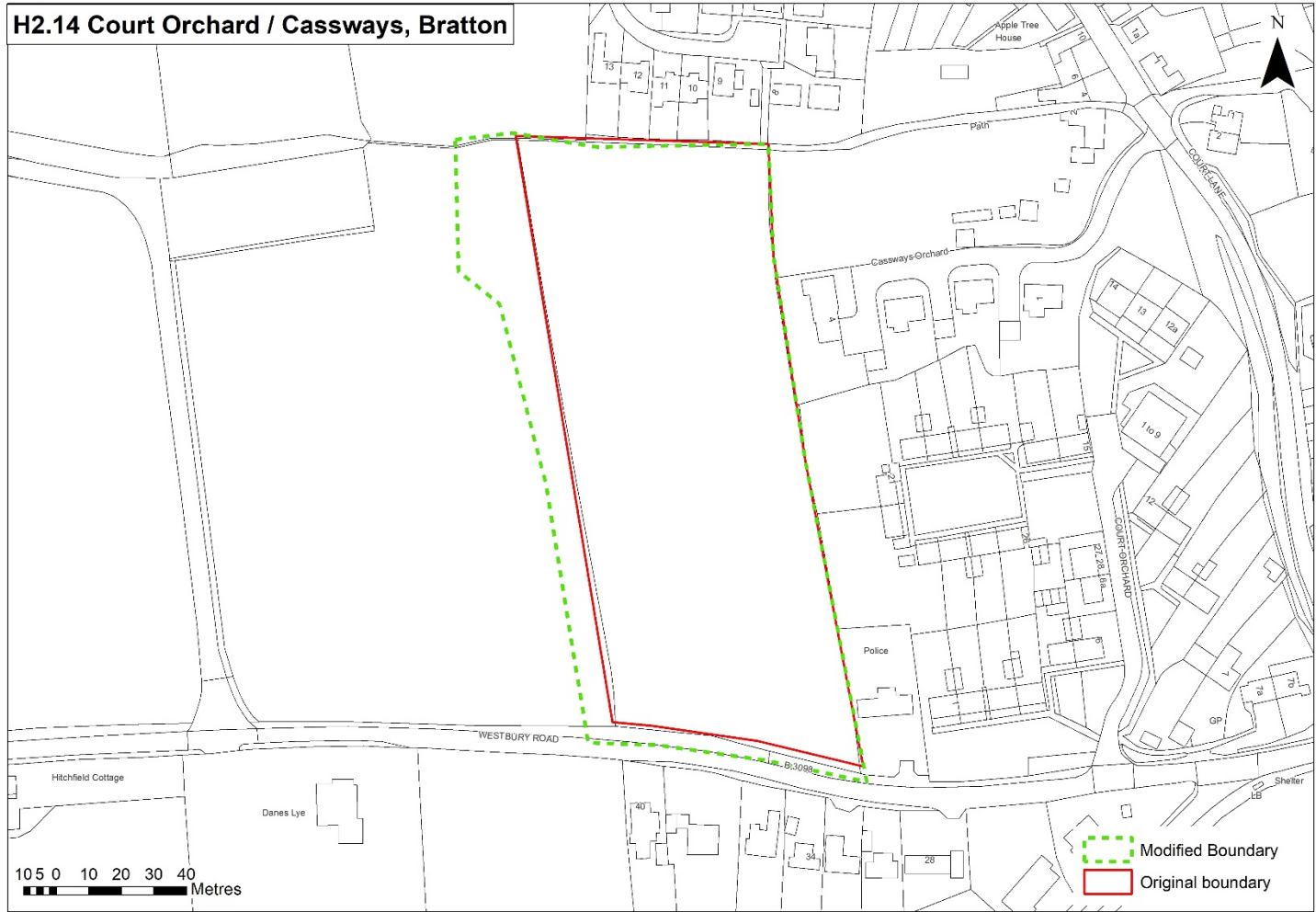
AM 31: Amendments to Table 4.11: As per PC27, factual update to table to reflect the latest housing supply figures (as at July 2018), and to reflect the addition of a new housing allocation at Salisbury (PC111).

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
Urban areas					
Amesbury, Bulford and Durrington	2,440	1,311,446	1,101,873	2,412,319	-1%-5%
Salisbury		2,273,243	3,833,970		
Wilton	6,060	323,321	208,211	6,637,938	10%-2%
TOTAL	8,500	3,907,420	5,142,054	9,049,257	6%-3%
Rural areas					
Amesbury CA remainder	345	176	58,73	237,249	-31%-28%
Mere CA remainder	50	3,742	57	4,249	-15%-2%
Mere (LSC)	235	126,123	139,143	265,266	13%
Downton (LSC)	190	88,101	105,92	193	2%
Tisbury (LSC)	200	170,169	59	175,178	-12%-11%
Wilton CA remainder	255	115,123	11,14	126,137	-51%-46%
Southern Wiltshire CA remainder	425	385,389	78,98	463,487	9%15%
Tisbury CA remainder	220	60,62	11,16	71,78	-68%-65%
TOTAL	1,920	1,920,185	412,452	1,572,163	-18%-15%

APPENDIX B

The amended map set out on the following page shows a minor change to the site allocation boundary. This will ultimately be displayed on the Policies Map that supports the development plan for Wiltshire. The Policies Map is not defined in statute as a development document and therefore the changes presented do not constitute Main Modifications (MMs).

Map showing proposed modification to the boundary of site allocation H2.14 Orchard Court, Bratton (site number as per Submission Version)



© Crown copyright and database rights 2020 Ordnance Survey 100049050



Wiltshire Housing Site Allocations Plan

Council Version

February 2020

Wiltshire Council

Information about Wiltshire Council services can be made available on request in other languages including BSL and formats such as large print and audio.

Please contact the council by telephone 0300 456 0100, by textphone 01225 712500, or email customerservices@wiltshire.gov.uk

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

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

ولٹشائر کونسل (Wiltshire Council) کی سروسز کے بارے میں معلومات دوسری طرزوں میں فراہم کی جاسکتی ہیں (جیسے کہ بڑی چھپائی یا آڈیو ہے) اور درخواست کرنے پر دوسری زبانوں میں فراہم کی جاسکتی ہیں۔ براہ کرم کونسل سے 0300 456 0100 پر رابطہ کریں، ٹیکسٹ فون سے (01225) 712500 پر رابطہ کریں یا customerservices@wiltshire.gov.uk پر ای میل بھیجیں۔

يمكن، عند الطلب، الحصول على معلومات حول خدمات مجلس بلدية ويلنتشير وذلك بأشكال (معلومات بخط عريض أو سماعية) ولغات مختلفة. الرجاء الاتصال بمجلس البلدية على الرقم 0300 456 0100 أو من خلال الاتصال النصي (تيكست فون) على الرقم 712500 (01225) أو بالبريد الإلكتروني على العنوان التالي: customerservices@wiltshire.gov.uk

1	Introduction	4
2	Context	8
3	Plan objectives	15
4	Housing delivery strategy	16
	Summary of site allocations	17
	Objective 2 Housing Land Supply	18
	Objective 3 Spatial Strategy	19
	East Wiltshire Housing Market Area	20
	North and West Wiltshire Housing Market Area	21
	South Wiltshire Housing Market Area	24
5	Housing site allocations	27
	East Wiltshire Housing Market Area	29
	Ludgershall	29
	North and West Wiltshire Housing Market Area	31
	Trowbridge	32
	Warminster	50
	Warminster Community Area Remainder	55
	Chippenham Community Area Remainder	57
	Westbury Community Area Remainder	59
	South Wiltshire Housing Market Area	62
	Salisbury	62
	Amesbury, Bulford and Durrington	76
6	Settlement boundary review	81
7	Implementation and monitoring	82

■ Appendices

A	Amended settlement boundaries	84
	East Wiltshire Housing Market Area	84
	Devizes Community Area	84
	Marlborough Community Area	90
	Tidworth Community Area	96
	Pewsey Community Area	101
	North and West Wiltshire Housing Market Area	106
	Bradford on Avon Community Area	106
	Calne Community Area	109
	Chippenham Community Area Remainder	112
	Corsham Community Area	117
	Malmesbury Community Area	122
	Melksham Community Area	127
	Royal Wootton Bassett and Cricklade Community Area	134
	Trowbridge Community Area	138
	Warminster Community Area	143
	Westbury Community Area	150
	South Wiltshire Housing Market Area	154
	Amesbury Community Area	154
	Mere Community Area	162
	Salisbury Community Area	164
	Southern Wiltshire Community Area	166
	Tisbury Community Area	174
	Wilton Community Area	179

1. Introduction

The Purpose of the Plan

- 1.1** The purpose of the Wiltshire Housing Site Allocations Plan ('the Plan') is to:
- revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and
 - allocate new sites for housing to ensure the delivery of homes across the plan period in order to help demonstrate a rolling five-year supply in each of Wiltshire's three HMAs over the period to 2026.
- 1.2** The policies of this Plan are strategic in nature. As a whole, the Plan supports the delivery of the Wiltshire Core Strategy. Therefore, the site allocations in this Plan will support the delivery of housing to meet strategic needs. However, as anticipated by Core Policy 2 of the Wiltshire Core Strategy, there remains a role for parish and town councils in bringing forward neighbourhood plans to deliver non-strategic allocations to support housing supply.

Settlement Boundary Review

- 1.3** The Council did not review the extent of the boundaries to inform the Wiltshire Core Strategy (WCS) and relied upon the former district local plans. They would instead be reviewed as a part of preparing the Plan.
- 1.4** Consequently, the Council has undertaken a comprehensive review of the boundaries to ensure they are up-to-date and adequately reflect changes which have happened since they were first established. The Plan amends settlement boundaries where necessary. It is also the prerogative of local communities to review them through the preparation of neighbourhood plans.

Housing Site Allocations

- 1.5** The WCS refers to the role of the Plan, in combination with the Chippenham Site Allocations Plan, to help ensure a sufficient choice and supply of suitable sites throughout the plan period in accordance with national policy and to compliment neighbourhood planning.

Plan Area

- 1.6** The Plan area is identified in Figure 1.1. It essentially corresponds with that of the adopted Core Strategy and hence covers Wiltshire, excluding the area of the Chippenham Site Allocations Plan (CSAP)⁽¹⁾.

1 The CSAP covers Chippenham Town and presents proposals for development in line with Core Policy 10 of the Wiltshire Core Strategy

Figure 1.1 The Plan Area



How the Plan has been prepared

- 1.7** Housing allocations have been made in general conformity with the settlement strategy outlined in Core Policy 1 as well as the relevant community area strategies contained within Chapter 5 of the WCS. Core Policy 2 supports the identification of sites through a subsequent Site Allocations Plan - now named the 'Wiltshire Housing Site Allocations Plan'.

- 1.8** The preparation of the Plan has also been informed by relevant plans and on-going evidence gathering to support decisions on the choice of sites and changes to settlement boundaries. The result of this work and how decisions have been reached is presented in a series of Community Area Topic Papers covering each part of the Plan area.
- 1.9** Additional information has been collated into five other topic papers and, together with Community Area Topic Papers these are all available on the Council's website. The additional papers are:
- Topic Paper 1 - Settlement Boundary Review Methodology
 - Topic Paper 2 - Site Selection Process Methodology
 - Topic Paper 3 - Housing Land Supply
 - Topic Paper 4 - Developing Plan Proposals
 - Topic Paper 5 - Assessment of Viability
- 1.10** A number of documents result from aspects of plan preparation required by legislation and they too play an important part. They can also be found on the website and comprise:
- Sustainability Appraisal
 - Habitat Regulations Assessment
 - Equality and Diversity Impact Assessment
 - A record of the steps taken under the Duty to Co-operate
 - Consultation Statement

Duty to Co-operate

- 1.11** The Plan has been prepared under a legal 'duty to cooperate' requirement through the Localism Act 2011 which requires local authorities to work with neighbouring authorities and other prescribed bodies when preparing a development plan document. It places a legal duty on local planning authorities in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic matters. When preparing plans local authorities should also have regard to the Local Enterprise Partnership and other bodies prescribed in law.
- 1.12** The Council engaged with neighbouring authorities and statutory consultees throughout the preparation of the WCS, which sets the framework for this Plan. They supported the spatial strategy and quantum of development through the WCS preparation process. The spatial strategy and quantum of development can be considered to involve strategic issues where the duty to cooperate has already been fulfilled through the Core Strategy process.
- 1.13** Examples of strategic issues on which there has been continued co-operation in the preparation of this plan are:
- Flood and surface water drainage considerations for individual sites and the impact of cumulative development discussed with the Environment Agency.
 - Any potential considerations to mitigate impact on the Strategic Road Network (SRN) with the Highways Agency, particularly for potential site allocation in Salisbury.
 - Site specific landscape considerations discussed with Natural England.
 - Biodiversity considerations discussed with Natural England.
 - Site specific heritage considerations discussed with Historic England
 - Any impact on the New Forest National Park by way of potential increased recreational use discussed with the New Forest National Park Authority.
 - Ensuring that future development helps address and manage phosphate levels in the River Avon, its tributaries and surrounding catchment area. The management of

phosphates in the River Avon catchment water system is being discussed with the Environment Agency and Natural England on an ongoing basis. A Nutrient Management Plan has been published and is being monitored⁽²⁾.

- 1.14** How the outcomes from the Duty to Co-operate have informed the preparation of the Plan is set out in a separate report: <http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan>.

Sustainability Appraisal

- 1.15** The Council appointed consultant Atkins to oversee the Sustainability Appraisal (SA) of the Plan. SA is iterative and integrated into the plan-making process, influencing the selection of site options and policies through the assessment of likely significant effects. The SA Report has been published alongside the Plan: <http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan>.

Policies Map

- 1.16** The Wiltshire Policies Map has been amended to include the allocations set out in Chapters 5 (Housing site allocations) and the updated settlement boundaries ('the Limits of Development') set out in Chapter 6 of this Plan.

2 'Nutrient Management Plan - Hampshire Avon' May 2015
<https://www.gov.uk/government/publications/nutrient-management-plan-hampshire-avon>

2. Context

National

- 2.1** The National Planning Policy Framework (NPPF) sets out the government's planning policies for England. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. One of its core principles is that development should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. The Plan is being prepared in accordance with that principle.
- 2.2** At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through plan-making and decision-taking.
- 2.3** It is an objective of the NPPF to deliver a wide choice of high quality homes and to boost significantly the supply of housing. The Plan identifies additional sites with these objectives in mind. They are developable over the plan period and they will supplement the existing supply. Some settlements have more environmental constraints than others and both new and existing allocations for housing development have differing degrees of complexity. This means that the Plan must involve a degree of flexibility and pragmatism to ensure a steady overall supply of enough land for housing development.

The Wiltshire Core Strategy

- 2.4** The Wiltshire Core Strategy (WCS) covers the whole of Wiltshire and sets out the Council's spatial vision, key objectives and overall principles for development in the County over the plan period 2006 to 2026. The WCS has been produced to be consistent with national policy and the Wiltshire Community Plan.⁽³⁾
- 2.5** The WCS identifies six key challenges for Wiltshire⁽⁴⁾:
- Economic growth to reduce levels of out-commuting from many of Wiltshire's settlements
 - Climate change opportunities to reduce greenhouse gas emissions and mitigate the consequences of a changing climate
 - Providing new homes to complement economic growth and a growing population
 - Planning for more resilient communities
 - Safeguarding the environmental quality of the County whilst accommodating new growth, and
 - Infrastructure investment to meet the needs of the growing population and economy.
- 2.6** The WCS presents a settlement strategy for managing growth over the period up to 2026 (Core Policy 1). The strategy establishes tiers of settlements based on an understanding of their role and function; and how they relate to their immediate communities and wider hinterland.
- 2.7** Core Policy 1 of the Core Strategy identifies five types of settlements, namely:
- Principal Settlements
 - Market Towns
 - Local Service Centres

3 <http://www.wiltshire.gov.uk/council-democracy-wfp-community-plan>

4 Paragraphs 2.6-2.19 of the WCS

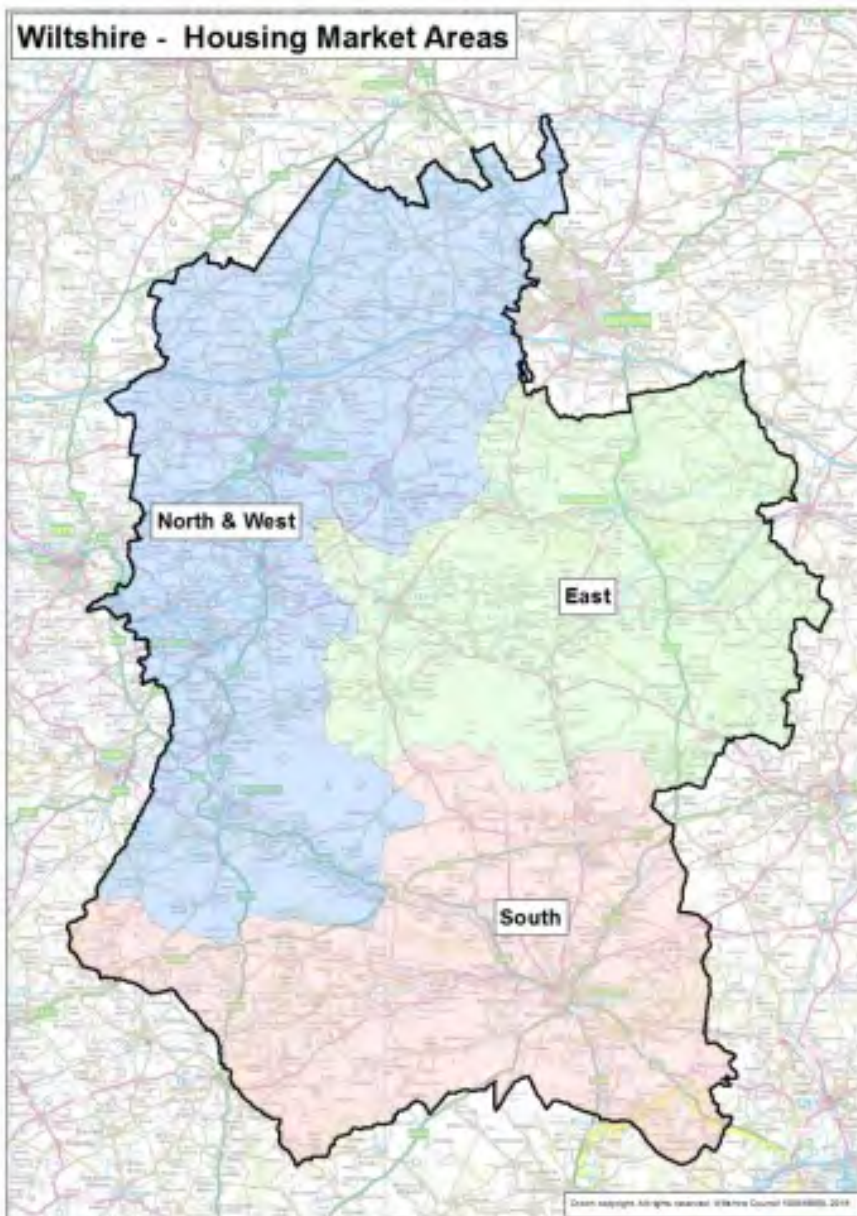
- Large Villages
- Small Villages

- 2.8** Settlement boundaries have been used in development plans for the County for a number of years. The WCS retains them. Except small villages each category of settlement has a “settlement boundary”. In simple terms, they are the dividing line, or boundary between areas of built/ urban development (the settlement) and non-urban or rural development - the countryside. In general, development within the settlement boundary is, in principle, acceptable, whereas development outside the settlement boundary is, with limited exceptions, not acceptable. The WCS uses settlement boundaries as a policy tool for managing how development should take place. Settlement boundaries are identified on the Policies Maps accompanying the WCS⁽⁵⁾.
- 2.9** Other than in circumstances as permitted by other policies listed in paragraph 4.25 of the WCS, development will not be permitted outside the defined settlement boundaries.
- 2.10** The WCS, in paragraph 4.13, sets out the intention for the retained settlement boundaries to be reviewed through the Housing Site Allocations Plan and the Chippenham Site Allocations Plan. Settlement boundaries can also be reviewed by the community through neighbourhood plans. The previous boundaries did not always reflect the built extent of settlements because they were determined some years ago. As a legacy of work done by the former District Councils, different methodologies were used to define the boundaries.
- 2.11** Settlement boundaries have been reviewed to ensure they are up-to-date and accurately reflect circumstances on the ground, derived on a consistent county-wide basis. In order that settlement boundaries remain up-to-date in that they reflect the existing built area, they will be reviewed periodically by Wiltshire Council and/or through neighbourhood plans, and the Policies Map will be updated accordingly.
- 2.12** Core Policy 2 of the WCS proposes that the County should accommodate at least 42,000 additional dwellings over the period 2006 to 2026. The WCS disaggregates this scale of housing to three separate housing market areas (HMAs - East, North and West and South) as shown in Figure 2.1 below⁽⁶⁾

5 Amendments to settlement boundaries made by individual Neighbourhood Plans will also be shown on the Development Plan Policies Maps

6 A separate allowance of 900 dwellings is also made for West of Swindon. See paragraph 4.34 of the WCS.

Figure 2.1 Wiltshire Housing Market Areas



2.13 Core Policy 2 of the WCS proposes a minimum housing requirement for each HMA as follows:

Table 2.1 Housing Market Area - Minimum requirements

Housing Market Area (HMA)	Minimum housing requirement (dwellings)
East Wiltshire	5,940
North and West Wiltshire	24,740
South Wiltshire	10,420

2.14 The NPPF requires that each Local Planning Authority demonstrate that there is five years supply of deliverable land for housing development for each of the HMAs based on the implied delivery rates of the WCS requirement. Fluctuations can occur in the delivery of housing but a central objective of the Plan, ensuring surety of supply, is to sustain a ‘five year housing land supply’ over the remainder of the plan period for each of these HMAs.

2.15 To guide how each HMA requirement should be achieved, the table below sets out the relationship between each tier of the settlement strategy and the expected level of development under Core Policy 1.

Table 2.2 Settlement Hierarchy - Levels of development

Settlement	Level of development
Principal Settlement	The primary focus for development and will provide significant levels of jobs and homes
Market Town	Have the potential for significant development that will increase the number of jobs and homes to help sustain/ enhance services and facilities and promote self-containment and sustainable communities
Local Service Centre	Modest levels of development to safeguard their role and deliver affordable housing
Large Village	Development limited to that needed to help meet the housing needs of settlements and improve housing opportunities, services and facilities
Small Village	Some modest development may be appropriate to respond to local needs and contribute to the vitality of rural communities, but limited to infill.

2.16 The WCS also disaggregates indicative levels of housing to each Community Area and includes indicative requirements for levels of housing for the Principal Settlements, Market Towns and in the South Wiltshire HMA, the Local Service Centres; and their surrounding community areas. This distribution of development directs the majority of development to these main settlements and promotes a sustainable pattern of development across the county. An objective of this Plan is to allocate land to support this distribution. The Plan allocations therefore focus on those ‘areas’ where land supply falls short of these indicative levels.

2.17 The indicative housing requirements as set out in Table 1 and the Area Strategy Policies of the WCS are as follows:

Table 2.3 Community Area Indicative Requirements

Area	Indicative requirement 2006-2026
Devizes	2,010
Devizes CA remainder	490

Area	Indicative requirement 2006-2026
Devizes CA Total	2,500
Marlborough	680
Marlborough CA remainder	240
Marlborough CA Total	920
Pewsey CA Total	600
Tidworth and Ludgershall	1,750
Tidworth CA remainder	170
Tidworth CA Total	1,920
EAST WILTSHIRE HMA	5,940
Bradford on Avon	595
Bradford on Avon CA remainder	185
Bradford on Avon CA Total	780
Calne	1,440
Calne CA remainder	165
Calne CA Total	1,605
Chippenham	4,510
Chippenham CA remainder	580
Chippenham CA Total	5,090
Corsham	1,220
Corsham CA remainder	175
Corsham CA Total	1,395
Malmesbury	885
Malmesbury CA remainder	510
Malmesbury CA Total	1,395
Melksham and Bowerhill	2,240
Melksham CA remainder	130
Melksham CA Total	2,370
Royal Wootton Bassett	1,070

Area	Indicative requirement 2006-2026
Royal Wootton Bassett and Cricklade CA remainder ⁽⁷⁾	385
Royal Wootton Bassett and Cricklade CA Total ⁽⁷⁾	1,455
Trowbridge	6,810
Trowbridge CA remainder	165
Trowbridge CA Total	6,975
Warminster	1,920
Warminster CA remainder	140
Warminster CA Total	2,060
Westbury	1,500
Westbury CA remainder	115
Westbury CA Total	1,615
NORTH & WEST WILTSHIRE HMA	24,740
Amesbury, Bulford and Durrington	2,440
Amesbury CA remainder	345
Amesbury CA Total	2,785
Mere	235
Mere CA remainder	50
Mere CA Total	285
Salisbury	6,060
Wilton	
Wilton CA remainder	255
Salisbury and Wilton CAs Total	6,315
Downton	190
Southern Wiltshire CA remainder	425
Southern Wiltshire CA Total	615
Tisbury	200
Tisbury CA remainder	220

7 Totals for Royal Wootton Bassett & Cricklade CA remainder and Royal Wootton Bassett & Cricklade CA exclude any development at the West of Swindon.

Area	Indicative requirement 2006-2026
Tisbury CA Total	420
SOUTH WILTSHIRE HMA	10,420

2.18 There is no requirement for each individual Community Area or settlement to have five years supply of land for housing. Furthermore, paragraph 4.30 of the WCS makes clear that:

“The disaggregation to Community Areas set out above is not intended to be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing for each market area. It clarifies the council’s intentions in the knowledge of likely constraints in terms of market realism, infrastructure and environmental capacity. They provide a strategic context for the preparation of the Housing Sites Allocation DPD and in order to plan for appropriate infrastructure provision.”

2.19 There are a number of sources for new homes to meet the requirements of Core Policy 2. They include:

- strategic allocations made within the WCS
- retained Local Plan allocations
- existing commitments
- regeneration projects, for example, those in Chippenham, Trowbridge and Salisbury
- Neighbourhood Plans
- windfall

2.20 The allocations shown in the Plan will supplement these existing sources to ensure a surety of supply over the plan period.

Relationship with Neighbourhood Planning

2.21 There are at the moment over sixty Neighbourhood Plans either being prepared or completed in Wiltshire and many more plans are likely over the years ahead. Many of these involve identifying land to meet the need for new homes. Their role in meeting housing requirements will become more significant alongside the Plan.

2.22 It is a priority of both Government and the Council that planning controls pass to local communities so they can develop their own local vision of sustainable development. Parish and Town Councils have been consulted on the review of settlement boundaries. The work being done on Neighbourhood Plans influences the selection of sites⁽⁸⁾ and where Neighbourhood Plans have been ‘made’ or are well advanced the Plan leaves decisions on the scale and locations for growth in settlements to the communities concerned.

2.23 In other locations, there may not yet be an appetite to prepare a Neighbourhood Plan or plans are at early stages of development. In these cases the Plan has considered how those settlements can accommodate additional housing and has allocated sites. In these cases, the priority to ensure a surety of housing land supply has taken precedence.

8 See stage 4a of the Housing Delivery Strategy below.

3. Plan objectives

- 3.1 Three objectives carry out the two purposes of the Plan to review settlement boundaries and allocate sites for housing development.

Settlement Boundary Review

- 3.2 The first objective for the Plan is to review settlement boundaries:

Objective 1: To ensure there is a clear definition to the extent of the built up areas at Principal Settlements, Market Towns, Local Service Centres and Large Villages

- 3.3 The Plan applies one consistent methodology for the County to replace the different ways used by the previous District Councils. The Council has developed this methodology in consultation with Parish and Town Councils. The process is explained in detail in Topic Paper 1: Settlement Boundary Review Methodology.
- 3.4 The result of the review and changes to settlement boundaries is discussed in Chapter 6 and shown in the appendix to the Plan.

Housing Site Allocations

- 3.5 The Plan allocates sites for housing development to ensure enough land is allocated to deliver the minimum requirements of each HMA. In so doing, the Plan has been prepared to achieve two further objectives:

Objective 2: To help demonstrate a rolling five year supply of deliverable land for housing development - a duty on each Local Planning Authority required by the NPPF.

- 3.6 The Plan must identify a number of greenfield sites involving the loss of countryside in order to achieve this objective. Land within settlements, in particular previously developed land, is acceptable for housing redevelopment in principle. A realistic allowance is included for this source of new housing when calculating the scale of land supply⁽⁹⁾. But within a predominantly rural area there is a limited amount of previously developed land. Not only are such opportunities limited, they can also be difficult to rely on as a large proportion of overall supply.

Objective 3: To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy. The spatial strategy for Wiltshire contained in the Core Strategy promotes the sustainable development of the County.

- 3.7 The spatial strategy describes a hierarchy of settlements within the County. Each tier recognises the particular role of those settlements and plans a level of new housing development that is appropriate. Chippenham, Salisbury and Trowbridge, are Principal Settlements supported by a number of Market Towns. Development at Large and Small Villages should accommodate local needs. Local Service Centres have also been identified that have a more pronounced role than villages. They possess a level of facilities and services that provide the best opportunities outside the Market Towns for sustainable development.

9 See Topic Paper 3 Housing for an explanation of how a windfall allowance has been estimated for each HMA. The approach accords with guidance contained in paragraph 48 of the NPPF.

4. Housing delivery strategy

How many homes are needed and where?

- 4.1 The WCS divides housing provision between the three HMAs. The vast proportion of housing needed over the plan period has already been built or is already committed.

Table 4.1 Housing Market Areas: Minimum to be allocated

Housing Market Area	Minimum Housing Requirement	Completions 2006-2017	Developable commitments 2017-2026	Minimum to be allocated
East Wiltshire HMA	5,940	3,624	2,311	5
North and West Wiltshire HMA	24,740	13,025	10,606	1,109
South Wiltshire HMA	10,420	5,388	3,701	1,331

- 4.2 The figures above do not include windfall and show a minimum that the Plan should aim to allocate, but a surplus is necessary to maintain five years supply of housing land in each HMA and to surpass the buffer in excess of five years required by the NPPF.
- 4.3 In order to deliver the spatial strategy, the priority for housing land allocations has been to focus on those higher tier settlements that have not yet met or contributed towards indicative levels of provision (Principal Settlements and Market Towns). This supports the sustainable development of the County sought by Objective 3 of the Plan. These settlements where allocations are justified are:

Table 4.2 Higher Tier Settlements where allocations were made

Housing Market Area	Principal Settlement, Market Towns and Local Service Centres
East Wiltshire HMA	Tidworth and Ludgershall
North and West Wiltshire HMA	Trowbridge Warminster
South Wiltshire HMA	Salisbury Amesbury, Bulford and Durrington

- 4.4 The WCS proposes much more modest levels of housing provision at Large Villages as reflected in the indicative scales of housing for each community area. Some new development, to meet local needs, may be appropriate at some of the designated Large Villages within these rural areas either through sites allocated in the Plan or by Neighbourhood Plans produced by the local community.
- 4.5 No allocations are made at Local Service Centres or Large Villages in the East Wiltshire HMA because there is no strategic priority to do so due to the level of completions and supply committed within the HMA. Housing to meet local needs can be identified where necessary

through neighbourhood planning. Neighbourhood planning will also supplement supply in the other two HMAs. No suitable sites were available at Large Villages in the South Wiltshire HMA and therefore the Plan makes no allocations in that area either. The Plan makes allocations at Large Villages only in the North and West Wiltshire HMA. These involve the following Community Areas:

Table 4.3 Community Areas where allocations were made at Large Villages

Housing Market Area	Large Villages
North and West Wiltshire Housing Market Area	Chippenham Community Area Remainder Warminster Community Area Remainder Westbury Community Area Remainder

Summary of site allocations

4.6 In summary the Plan allocates the following sites in each HMA.

East Wiltshire Housing Market Area

Table 4.4 East Wiltshire Housing Market Area - Summary of allocations

Settlement	SHLAA reference	Site Name	Approximate dwellings
Ludgershall	553	Empress Way	270 ⁽¹⁰⁾

North and West Wiltshire Housing Market Area

Table 4.5 North and West Housing Market Area - Summary of allocations

Settlement	SHLAA reference	Site Name	Approximate dwellings
Yatton Keynell	482	East of Farrells Field	30
Trowbridge	613	Elm Grove Farm	250
	1021	Church Lane	45
	3260	Upper Studley	45
	298	Land off the A363 at White Horse Business Park	175
	3565	Southwick Court	180
	297/ 263	Elizabeth Way	355
Warminster	302/ 1032	Bore Hill Farm	70
	304	Boreham Road	30

¹⁰ This total includes 109 dwellings that already have planning permission

Chapmanslade	316	Barters Farm Nurseries	35
Bratton	321	Court Orchard / Cassways	35

South Wiltshire Housing Market Area

Table 4.6 South Housing Market Area - Summary of allocations

Settlement	SHLAA reference	Site Name	Approximate dwellings
Durrington	3154/ S98	Clover Lane	45 ⁽¹¹⁾
	3179	Land off Larkhill Road	15
Salisbury	S1028	Land at Netherhampton Road	640
	S61	Land at Hilltop Way	10
	S1027	North of Netherhampton Road	100
	3272	Rowbarrow	100
	OM003	The Yard	14

4.7 The site allocations for each HMA meet two objectives of the Plan (Objectives 2 and 3):

- To help demonstrate a rolling five year supply of deliverable land for housing development.
- To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy.

Objective 2 Housing Land Supply

4.8 In addition to allocations in the WCS and the Plan, as well as sites with planning permission, the Council has made an allowance for windfall sites in the five year supply. With sites allocated in this plan, overall provision for new housing in each HMA is as follows:

Table 4.7 HMA housing land supply 2006-2026

Housing Market Area (HMA)	Minimum Housing Requirement	Completed (2006-2017)	Commitments (2017-2026)	Windfall Allowance (2017-2026)	Plan Allocations (2017-2026)	TOTAL	Surplus
East Wiltshire	5,940	3,624	2,311	823	161	6,919	979
North and West Wiltshire	24,740	13,025	10,606	2,209	1,103	26,943	2,203

11 This total includes approximately 15 dwellings that already have planning permission

South Wiltshire	10,420	5,388	3,701	743	804	10,636	216
-----------------	--------	-------	-------	-----	-----	--------	-----

4.9 The Plan helps to provide for the amount of housing required by the WCS. Plan preparation has also looked at the likely timings of construction of the various land sources using trajectories of dwelling completions (housing trajectories). The results are reported in Topic Paper 4: Developing Plan Proposals. This assesses how the Plan achieves a sufficient supply in each year over the plan period in order to meet the objective of ensuring a five year supply of deliverable land for each of the remaining years of the WCS plan period to 2026.

4.10 Housing trajectories are site by site estimates of start and finish dates and annual completions. Aggregating housing trajectories for each HMA shows how the Plan helps to deliver in excess of five years supply of land in each area for the remaining years of the plan period. The table below provides estimates of how many years supply there will be in each remaining year of the plan period. It shows that supply exceeds the five year requirement through to the end of the plan period for all years except four in the South Wiltshire HMA and by then additional allocations will be included within the review of the WCS.

Table 4.8 HMA Five year land supply estimates 2017-2026

HMA	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East Wiltshire	8.54	8.81	9.64	10.77	14.98	14.62	12.89	11.50	8.23
North and West Wiltshire	6.15	6.66	6.85	6.87	6.95	6.95	6.76	6.21	5.38
South Wiltshire	5.70	5.95	5.75	5.57	5.46	5.14	4.19	3.25	2.42

4.11 To be sure of maintaining a surety of supply, the annual estimates should exceed the five year requirement and buffer anticipated by national planning policy. A surplus is important to allow for any possibility of under delivery in the future.

Objective 3 Spatial Strategy

4.12 The scale and distribution of sites at each settlement is consistent with the spatial strategy in the WCS. A shortage of new housing and infrastructure for instance will limit provision for affordable homes, could depress economic growth and undermine the viability and vitality of town centres. On the other hand, widespread over provision, particularly toward smaller rural settlements, might undermine the spatial strategy. A symptom of this would be over burdened local infrastructure and greater environmental impacts from more travelling between settlements and more widespread loss of countryside.

4.13 It would not, however, be reasonable to expect the distribution and scale of land supply to adhere rigidly to the levels set in the WCS. It would be unrealistic to expect as much. The WCS explains that levels are indicative and that there needs to be some flexibility.

4.14 Levels of housing development in settlements and rural areas are indicative levels of growth. They are approximate and neither minimum or maximums; instead they are an indication of the general scale of growth appropriate for each area and settlement during the plan period.

4.15 The following sections describe the relationship between the distribution of housing development (including the site allocations) and the spatial strategy for each of the County's HMAs.

East Wiltshire Housing Market Area

4.16 The table below compares indicative with proposed levels of growth in each Community Area:

Table 4.9 East Wiltshire HMA - Distribution of housing development 2006-2026

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	%Variation
Urban areas					
Devizes	2,010	1,501	612	2,113	5.1%
Marlborough	680	397	304	701	3.1%
Tidworth and Ludgershall	1,750	767	1,177	1,944	11.1%
TOTAL	4,440	2,665	2,093	4,758	7.2%
Rural areas					
Devizes CA remainder	490	297	112	409	-16.5%
Marlborough CA remainder	240	157	52	209	-12.9%
Pewsey CA	600	416	192	608	1.3%
Tidworth CA remainder	170	89	23	112	-34.1%
TOTAL	1,500	959	379	1,338	-10.8%

4.17 The overall pattern of growth is in general conformity with the WCS. It is consistent with the principles of the spatial strategy. Compared to indicative levels, development is focussed slightly more on the Market Towns (+7.2%) and less on the rural settlements (-10.8%).

4.18 Indicative levels of housing for Market Towns are not a ceiling and a variance would not seem to present new or significant issues for local infrastructure and environmental capacity.

4.19 Similarly, variations from the spatial strategy do not appear to give rise to significant issues. The rural area around Tidworth contains two designated Large Villages: Collingbourne Ducis and Netheravon. Collingbourne Ducis has experienced above average growth since 2006. This would seem sufficient to help maintain its role. Netheravon has several brownfield sites that are potentially suitable for redevelopment and these possibilities would be best explored through a neighbourhood planning process.

4.20 A number of rural communities within the HMA are developing a local vision for the sustainable development of their settlement using neighbourhood planning⁽¹²⁾. These will address local needs, including needs for new homes, and they will progress further allocations to include housing that will contribute to supply. Neighbourhood plans will be a main means to sustain the roles of Large Villages described in the spatial strategy.

4.21 The distribution of housing development accords with the underlying principles of the WCS to direct development to the most suitable, sustainable locations.

North and West Wiltshire Housing Market Area

4.22 The table below compares indicative with proposed levels of growth in each Community Area:

Table 4.10 North and West HMA - Distribution of housing development 2006-2026

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	%Variation
Urban areas					
Bradford on Avon	595	384	218	602	1%
Calne	1,440	1,034	847	1,881	31%
Chippenham	4,510	1,230	3,016	4,246	-6%
Corsham	1,220	597	629	1,226	0%
Malmesbury	885	657	385	1,042	18%
Melksham and Bowerhill	2,240	1,445	1,113	2,558	14%
Royal Wootton Bassett	1,070	1,014	140	1,154	8%
Trowbridge	6,810	3,019	2,494	5,513	-19%
Warminster	1,920	615	1,040	1,655	-14%
Westbury	1,500	940	851	1,791	19%
TOTAL	22,190	10,935	10,733	21,668	-2%
Rural areas					
Bradford on Avon CA remainder	185	123	56	179	-3%
Calne CA remainder	165	96	171	267	62%
Chippenham CA remainder	580	419	116	535	8%

12 Community Area Topic Papers summarise progress on neighbourhood planning

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	%Variation
Corsham CA remainder	175	285	96	381	118%
Malmesbury CA remainder	510	340	170	510	0%
Melksham CA remainder	130	115	44	159	22%
Royal Wootton Bassett and Cricklade CA remainder	385	305	177	482	25%
Trowbridge CA remainder	165	256	32	288	75%
Warminster CA remainder	140	91	68	159	14%
Westbury CA remainder	115	60	46	106	-8%
TOTAL	2,550	2,090	976	3,066	20%

- 4.23** There are marked differences in the anticipated growth of many of the Market Towns in the HMA (including Calne, Malmesbury, Melksham and Bowerhill, and Westbury) over the plan period compared to the two Principal Settlements of the HMA, Chippenham and Trowbridge.
- 4.24** Growth at Chippenham and Trowbridge has not matched expectations. Land has been in short supply or delayed in coming forward. As Principal Settlements within the HMA they are intended to be the primary focus for development, providing significant levels of jobs and homes.
- 4.25** In contrast, rates of development at most Market Towns have met expectations and at Bradford on Avon, Calne, Malmesbury, Melksham and Bowerhill, Royal Wootton Bassett and Westbury anticipated levels of growth have been exceeded over the first half of the plan period. Land has been available and some additional sites granted consent by planning appeals. Over the same interval, scales of development within rural areas in many places have also exceeded those anticipated by the WCS.
- 4.26** Indicative levels of housing for Market Towns are not a ceiling and variations would not seem to present new or significant issues for local infrastructure and environmental capacity. Allocations made in the Plan are made to support the spatial strategy. It is not however practical for the Plan to completely re-dress imbalances in the distribution of development from what the spatial strategy envisaged. A review of the WCS is also the appropriate means to properly consider the performance and longer term prospects of settlements.

- 4.27** Chippenham now has the potential to meet the minimum scale of growth anticipated in the WCS by delivery of higher rates of house building in the last half of the plan period compared to much lower rates over recent years. This will come about in large part as a result of significant allocations for housing development made in the Chippenham Site Allocations Plan as well as other significant permissions at the town.
- 4.28** Until very recently there has been a shortage of development opportunities in the town. It is difficult to substantiate a direct connection, but this shortage may also have contributed to the higher than anticipated rates of development experienced by Calne, neighbouring Chippenham. Higher rates of development than expected cause concern about the adequacy of local infrastructure to support population growth and about environmental impacts. No allocations are proposed in the Plan for Calne or Corsham.
- 4.29** Symptoms of similar circumstances appear to be apparent with regard to Trowbridge as at Chippenham, although there would not appear to be such a pronounced shortage of land at Trowbridge.
- 4.30** Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 1,050 dwellings. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,297.
- 4.31** One main reason for a shortfall in land supply is the complexity and consequent delay developing Ashton Park, a south eastern extension to the town. 1,350 dwellings will be built on this site in the plan period and a further 1,250 post 2026; rather than first envisaged that the whole of the allocation would have been completed in the plan period. This broadly equates to the 1,297 dwelling shortfall.
- 4.32** A second main reason for a shortfall has been the inability to identify enough land free from environmental constraints that could compensate for the consequences of delay to Ashton Park. Designated Green Belt provides long term protection from development and limits the scope for Trowbridge to expand. Ecological constraints result from the need to safeguard habitats for protected bats. Other options are limited for different reasons.
- 4.33** In addition, to meet Plan objectives, land identified should be capable of development within the plan period. Unlike Salisbury, there are no reserve locations or areas of search. At this stage, substituting one complex site by another would not provide a remedy to a relatively short-term issue.
- 4.34** Looking over the plan period there has not been as dramatic a fall off in dwelling completions at Trowbridge as took place at Chippenham. The Plan allocations provide choice and flexibility as well as add to supply. The shortfall compared to an indicative level is not so severe as to jeopardise the position of Trowbridge as a Principal Settlement or undermine objectives of the spatial strategy. The WCS makes clear that indicative requirements for community areas provide context and are not prescriptive. A lower provision over the shorter term represents the flexibility associated with the indicative nature of the requirements of the WCS.
- 4.35** Both Westbury and villages around Trowbridge have experienced higher than anticipated rates of growth. The WCS has the objective of consolidating growth at Westbury and this plan makes no additional allocations for housing development.
- 4.36** Constraints to Trowbridge's longer term growth will be addressed as part of the review of the Core Strategy that will look from 2016 beyond 2026 to 2036. This might include a review of how Green Belt boundaries around the town may affect the town's longer term prospects.

- 4.37** Differences from the pattern of development envisaged by the WCS have arisen over the first half of the plan period. Plan allocations go some way to reversing this, but only so far. Specifically, growth at Trowbridge is more constrained and more difficult to realise than had been envisaged, although not so much as to fundamentally undermine the spatial strategy. Housing provision exemplifies the flexibility made necessary by the indicative nature of community area requirements of the WCS.
- 4.38** The scale of development at Warminster is not envisaged to meet indicative strategic requirements. Three proposals of the Plan improve choice in the Town. Constraints include flood risks and managing phosphate levels that can affect the River Avon Special Area of Conservation. The West Warminster Urban Extension, a strategic site in the WCS, provides by far the largest part of new housing to serve the town and this area will continue to do so for several more years after 2026. It provides a longer term surety of supply that supports the role and function of the town.
- 4.39** Allocations of the Plan at Large Villages in the HMA are made only at those settlements where indicative levels will not be met and where local needs are not being addressed through neighbourhood planning. As well as being necessary to help ensure a surety of supply, these allocations will help to support the role of those Large Villages, supporting a range of local employment, services and facilities.

South Wiltshire Housing Market Area

- 4.40** Overall, the scale of development at urban areas matches the intention of the strategy in terms of how much growth is focussed on the main settlements. There are minor differences between indicative and proposed levels that are not significant. They would not present new or significant issues for local infrastructure and environmental capacity. Less provision is made for rural areas.

Table 4.11 South Wiltshire HMA - Distribution of housing development 2006-2026

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	%Variation
Urban areas					
Amesbury, Bulford and Durrington	2440	1,446	873	2,319	-5%
Salisbury	6,060	2,436	2,970	5,938	-2%
Wilton		321	211		
TOTAL	8500	4,203	4,054	8,257	-3%
Rural areas					
Amesbury CA remainder	345	176	73	249	-28%
Mere CA remainder	50	42	7	49	-2%
Mere (LSC)	235	123	143	266	13%
Downton (LSC)	190	101	92	193	2%

Tisbury (LSC)	200	169	9	178	-11%
Wilton CA remainder	255	123	14	137	-46%
Southern Wiltshire CA remainder	425	389	98	487	15%
Tisbury CA remainder	220	62	16	78	-65%
TOTAL	1,920	1,185	452	1,637	-15%

- 4.41** The South Wiltshire HMA has a less generous housing land supply than elsewhere in Wiltshire.
- 4.42** Salisbury is the Principal Settlement within the HMA. It is intended to be the primary focus for development, providing significant levels of jobs and homes. Two site allocations of more than 500 dwellings provide a large source of supply to the end of the Plan period to ensure that the City achieves the role set out in the spatial strategy: Fugglestone Red and land at Netherhampton Road. The first is a strategic site allocated in the WCS. The latter of these, land at Netherhampton Road, is an allocation of the Plan.
- 4.43** It is unlikely that all the strategic sites allocated in the WCS for Salisbury would deliver sufficiently within the plan period to meet housing requirements and ensure supply, and therefore land allocated at Netherhampton Road is necessary. A shortage of land could impede the City's prospects and it could also lead to greater development pressures in other settlements in the HMA less suited to growth.
- 4.44** One of the WCS strategic allocations, namely Churchfields is a strategic mixed-use site that Core Policy 20 of the WCS requires to deliver 1100 dwellings by 2026. To be developed, this site requires substantial employment uses to decant and is now expected to commence later than envisaged beyond the current plan period of 2026. It is a complex regeneration project that will take time to deliver and will require other sites to enable existing businesses to relocate.
- 4.45** The site at Netherhampton Road has the ability to address the lack of housing delivery at Churchfields, later within the plan period. The WCS identifies the site within an area of search, to be considered if further land is required in future to meet housing requirements, as part of the Council's monitoring process. Monitoring has shown that further land is required due to the redevelopment of Churchfields taking longer than anticipated. The Plan therefore implements this contingency in order to ensure a sufficient supply of housing. The allocation of land at Netherhampton Road, a substantial site, will not lead to an increase in the overall scale of housing growth at Salisbury than was proposed by the WCS.
- 4.46** Recognising the scale of the site, a generous lead in time is provided for the delivery of Netherhampton Road. The site is not expected to contribute to housing delivery for several years whilst work is carried out to masterplan the site and develop mitigation measures. In the meantime, supply from major schemes such as Fugglestone Red and Longhedge will ensure sufficient supply. Fugglestone Red and the Netherhampton Road sites will deliver new homes alongside each other toward the end of the plan period.
- 4.47** Further sites at Salisbury support provision for primary education in the south of the City. They improve choice. They also help to safeguard land supply should there be unforeseen and serious delay with the delivery of any other sites.

- 4.48** Provision for the rural areas of the HMA can be divided between growth at Local Service Centres and elsewhere, including Large Villages.
- 4.49** Local Service Centres are defined as smaller towns and larger villages which serve a surrounding rural hinterland and possess a level of facilities and services that together with improved local employment, provide the best opportunities outside the Market Towns for greater self containment. Levels of housing development envisaged at Mere and Downton fit with that strategy. The level of development proposed for Tisbury is lower. There is a significant brownfield site option under consideration through the neighbourhood planning process that takes priority over consideration of greenfield alternatives. This would meet indicative requirements at the settlement.
- 4.50** In terms of the wider rural area, overall, given the flexibility that should be associated with indicative requirements there is no fundamental conflict with the spatial strategy and proposals are in general conformity with the WCS. There are three Large Villages in the rural area around Tisbury all of which are within the Cranborne Chase and West Wiltshire Downs AONB. The Plan does not propose any allocations because of a variety of constraints and a lack of land availability. In the rural area around Wilton, of the two Large Villages, Dinton has already experienced relatively significant growth and at Broad Chalke sites are being investigated through the preparation of a Neighbourhood Plan, although the local primary school has limited capacity to support growth. Neighbourhood planning is suited to addressing local needs in these circumstances.

5. Housing site allocations

Introduction

- 5.1** By assessing each of the settlements identified in Core Policy 1, a site selection process has produced a range of sites suitable for residential development. Scales of development reflect each site's suitability. They also have regard to the role of a settlement and its size as well as the indicative requirements for housing in each community area, as presented in the WCS. Development will be required to provide for the necessary on-site and, where necessary, off-site infrastructure requirements arising from proposals in accordance with Core Policy 3 (Infrastructure requirements).
- 5.2** The design and form of development will accord with policies of the WCS. Core Policy 57 (Ensuring High Quality Design and Place Shaping) requires a high standard of design of all development.
- 5.3** Landscaping will be provided at boundaries and throughout each site retaining and reinforcing as much as possible of existing hedgerow and tree cover. This will often be required in order to establish a visual boundary to a settlement and so help preserve the settlement's character and appearance in the wider landscape as well as protect the amenity of adjoining uses, as will tools such as Landscape and Visual Impact Assessment (LVIA) as part of the planning application process. Core Policies 51 and 52 are particularly relevant (Landscape and Green Infrastructure). Some sites relate to Areas of Outstanding Natural Beauty and building design, layout and landscaping measures will be necessary to deliver a scheme which positively assimilates within the wider landscape setting and reflects the character of the local vernacular in accordance with requirements of Core Policy 51. Moreover, in delivering high quality design, development of the allocated sites should take opportunities to improve cycling and walking connectivity in accordance with Core Policy 61.
- 5.4** An ecological assessment will be required for all sites. The development will protect and improve opportunities for biodiversity and wildlife corridors within and adjoining the site in accordance with Core Policy 50 (Biodiversity and Geodiversity). Most sites proposed are of more than one hectare and will therefore require a flood risk assessment (incorporating an assessment of the predicted effects of climate change) in order to ensure that there is no increase in risk of flooding on site and elsewhere, thereby complying with Core Policy 67 (Flood Risk) and national policy. In addition, sites proposed within Source Protection Zones (SPZ) 1 and 2 will need to comply with Core Policy 68 (Water Resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy. Consideration should be given to the predicted effects of climate change and proposals should allocate appropriate buffer strips where there is no adjacent built development. Natural flood management should be incorporated into planning proposals to mitigate new and existing developments.
- 5.5** The Environment Agency and Natural England advise that all development within the River Avon catchment should be 'phosphate neutral' for an interim period until 2025. Beyond this time an approach will take account of water company planning, as well as latest Government policy and legislation. This is to guard against a further worsening of the condition of the River Avon Special Area of Conservation (SAC). An annex of the Nutrient Management Plan will explain measures to help deliver phosphate neutral development and how they will be delivered. Some measures are capable of being delivered as part of housing development. Off-site measures are supported by Community Infrastructure Levy and there is also scope to improve the efficiency of sewage treatment works. The definition of 'phosphate neutral'

is the additional phosphorous load generated by new development after controls at source, reduction by treatment and/or off-setting measures leading to no net increase in the total phosphorous load discharged to the River Avon SAC.

- 5.6** Development has the potential to affect the significance of heritage assets within or beyond site boundaries. The Council commissioned consultants to prepare a high-level Heritage Impact Assessment (HIA) to support the Plan. The HIA identifies and assesses the significance of heritage assets (and their settings) on sites where such matters will be particularly important considerations to address in subsequent planning applications. Where necessary, further, detailed, site-specific heritage assessments will prescribe measures which will need to be incorporated as part of a scheme in order to protect them, including the importance of their settings. The determination of planning applications will follow the approach set out in National Planning Policy Framework (paragraphs 189 to 202) and satisfy requirements of Core Policy 58 (Ensuring the Conservation of the Historic Environment) of the WCS. This should include archaeological assessment where necessary
- 5.7** Transport impacts from a proposal will also need detailed assessment in order to accord, in particular, with Core Policy 62 (Development Impacts on the Transport Network). Depending upon the characteristics of individual sites, other policies of the core strategy will be relevant to the determination of planning applications for each of the sites proposed.
- 5.8** The Council will seek a proportion of new homes as affordable housing in accordance with Core Policy 43 (Providing Affordable Homes).
- 5.9** In addition to Community Infrastructure Levy, the Council will also seek funding contributions toward infrastructure or mitigation that is not identified for levy funding and which is directly related to development and necessary for it to proceed. Satisfying the requirements of Core Policy 3 will therefore also be important.
- 5.10** Proposals for new housing sites must be read in conjunction with the Wiltshire Core Strategy and will be considered against all relevant policies, including those relating to place shaping and high quality design. Developers of more substantial sites will also prepare Sustainable Energy Strategies setting out how proposals meet carbon reduction targets, and identifying how maximum targets can be achieved, particularly where lower cost solutions are viable (such as combined heat and power).
- 5.11** Standards for provision to meet leisure and recreation needs of any application will be applied to each of the proposals. An audit of existing open space assets will inform outdoor sports provision. Shortages of amenity green space, parks and areas for informal recreation may be addressed by provision for open space by proposals but will solely be of a form and scale to meet the needs of new development.
- 5.12** As appropriate, additional evidence will need to be prepared at a level of detail to support a planning application. Such new evidence can be used as a material consideration when considering a specific planning application. In many cases, particularly important items are referred to for each allocation. Such evidence may include, but is not limited to a Landscape and Visual Impact Assessment, site specific Heritage Assessment, Biodiversity Report, Surface Water Management Plan (incorporating a site wide, comprehensive drainage strategy), Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change), and Transport Statement.

East Wiltshire Housing Market Area

5.13 Land for housing development is identified to support the role of settlements in the East Wiltshire HMA, to ensure supply, improve choice and competition in the market for land. The following site is allocated for development, as shown on the Policies Map:

Table 5.1 Housing Allocation in the East Wiltshire Housing Market Area

Community Area	Reference	Site Name	Approximate number of dwellings
Tidworth	H1.1	Empress Way, Ludgershall	270

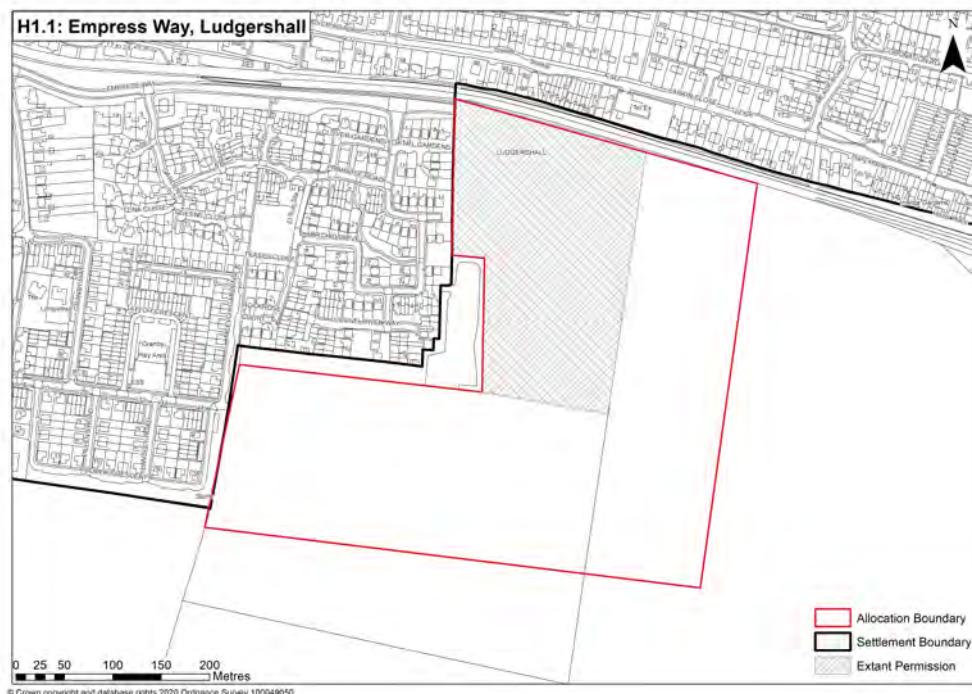
5.14 The specific requirements and form development will take are described below for the site to ensure they are each appropriate in scale and character to their location and in accordance with WCS and national policy.

Ludgershall

5.15 Ludgershall, along with Tidworth is designated as a Market Town and has the potential for significant development. The WCS envisages Ludgershall, together with Tidworth, accommodating approximately 1,750 additional dwellings over the plan period. As a part of the settlement strategy, an increase in jobs and homes in the town will help to enhance services and facilities and promote better levels of self-containment and viable sustainable communities (Core Policy 1, WCS). Further development will support it carrying out this role.

H1.1 Empress Way

Figure 5.1 H1.1 Empress Way, Ludgershall



Policy H1.1

Land at Empress Way, as identified on the Policies Map is allocated for development comprising the following elements:

- approximately 270 dwellings;
- vehicular access from Empress Way and Simonds Road/New Drove, via the Granby Gardens development site, together with a connecting highways link between the two points of access;
- 1.8ha of land reserved for a two form entry primary school in the south eastern corner of the site; and
- improvements to cycling and walking routes through the site to link into the existing network, including the retention and enhancement of public rights of way LUDG1 and LUDG2.

Development proposals will be subject to the following requirements:

- a planning obligation to safeguard land for a primary school for an agreed period of time;
- a transport assessment that will determine the trigger point for the delivery of the access via Simonds Road and inform detailed measures to mitigate impacts on the local road network;
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site;
- Layout and design of the development will be expected to take particular care to ensure that a suitable boundary with the open countryside is provided; and
- layout of the development will be informed by an odour assessment, to be undertaken in consultation with Southern Water to ensure a satisfactory living environment will be created.

Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements and opportunities, delivered to achieve the comprehensive development of the site, including the timely and coordinated provision of necessary infrastructure.

5.16 Approximately 16.5ha of land at Empress Way, as shown on the policies map, are allocated for development. The proposal is to extend land already with permission⁽¹³⁾ for housing development to allow for a further 160 dwellings. The total amount of development will therefore be 270 dwellings. The treatment and design of the site will be one comprehensive development proposal.

5.17 The site is formed of agricultural land on the southern edge of the town. It is a logical extension to the town in an accessible location with regard to local services and facilities but there are limited established natural boundaries that help to enclose the site. There are no field boundaries on the site's southern and eastern edges, although there is limited screening on the boundaries adjoining the railway line and existing residential development.

13 Outline planning permission reference E/2013/0234/OUT (land adjacent to Empress Way).

- 5.18** Vehicular access to the site would be required from Empress Way and via the Granby Gardens development site. Development of the site will include a connecting link road through the site to the two points of access. Transport assessment will determine the trigger point for the delivery of the access via Simonds Road and inform detailed measures to mitigate impacts on the local road network, including the A342 Andover Road, Memorial Junction and the capacity of the signals on the nearby railway bridge.
- 5.19** Development of the site will include 1.8ha reserved for a two form entry primary school. Based on current estimates, capacity within local primary schools will be absorbed by committed development elsewhere in the town. The need to retain the reserved land for a school will be determined as part of the application process based on an assessment of future need for primary school places at the time of an application. In the event that land for a school is not required within a period to be agreed with the Wiltshire Council's Education Department, then the land will be returned and thereby revert to agricultural use. Responsibility for provision of the school will lie with the Council and the process and timescale for delivery will be in agreement with the developer. The development will also be subject to the normal contributions to education provision in accordance with core policies of the Wiltshire Core Strategy.
- 5.20** The site design will be led by a strong landscape framework. Significant additional screening at the southern and eastern site boundaries would be required, along with landscaping and green infrastructure throughout the site as there are middle and long distance views of the site from the south. The final design and layout should be informed by a Landscape and Visual Impact Assessment, Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy. Development will provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider. Development layout should be informed by an odour assessment, to be undertaken in consultation with Southern Water.

North and West Wiltshire Housing Market Area

- 5.21** Land for housing development is identified to ensure supply, support the role of settlements in the North and West Wiltshire HMA, and improve choice and competition in the market for land.
- 5.22** As a Principal Settlement, the WCS anticipates that Trowbridge will be a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period to 2026. Additional allocations are therefore made to support this role.
- 5.23** Other allocations are made at Warminster, a Market Town, to support its role and at designated Large Villages in the rural parts of Chippenham and Westbury Community Areas geared to support local needs in accordance with WCS Core Policy 2. The following sites are allocated for development, as shown on the policies map:

Table 5.2 Housing Allocations in the North and West Wiltshire Housing Market Area

Community Area	Reference	Site Name	Approximate number of dwellings
Trowbridge	H2.1	Elm Grove Farm, Trowbridge	250
	H2.2	Land off the A363 at White Horse Business Park, Trowbridge	175

Community Area	Reference	Site Name	Approximate number of dwellings
	H2.3	Elizabeth Way, Trowbridge	355
	H2.4	Church Lane, Trowbridge	45
	H2.5	Upper Studley, Trowbridge	45
	H2.6	Southwick Court, Trowbridge	180
Warminster	H2.7	Bore Hill Farm, Warminster	70
	H2.8	Boreham Road, Warminster	30
	H2.9	Barthers Farm Nurseries, Chapmanslade	35
Chippenham	H2.10	East of Farrells Field, Yatton Keynell	30
Westbury	H2.11	Off B3098 adjacent to Court Orchard / Cassways, Bratton	35

5.24 The specific requirements and form development will take are described below for each site to ensure they are each appropriate in scale and character to their location and in accordance with WCS and national policy.

Trowbridge

5.25 The WCS envisages approximately 6,810 new dwellings at the Principal Settlement of Trowbridge over the Plan period (2006-2026). Whilst much of this has either been delivered, or is committed in the form of planning permissions and a strategic site allocation in the WCS (Ashton Park), a significant volume of additional housing will be required in order to help address residual indicative requirements.

5.26 In the face of the need to identify sites for additional housing at the town, there are significant ecological, landscape (Green Belt) and infrastructure constraints that significantly limit the choice of available sites. Assessment evidence demonstrates three considerations to be addressed in order for housing development to be accommodated:

- Ecology:** an interconnected pattern of priority Biodiversity Action Plan (BAP) habitats such as mature hedgerows, trees and water features, along with designated woodland features around the town support significant populations of protected bat species associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). Additional housing development will increase the population of the town and thereby amplify the risk of recreational pressure on bats. To address this issue, the Habitats Regulations Assessment (HRA) for the Plan recommends a strategy for managing recreational pressure across the town. This states that core bat habitat should be retained and buffered to protect and enhance the local features, to be identified through appropriate survey, of each site. Detailed design and layout of schemes will be informed by survey work in accordance with the Trowbridge Bat Mitigation Strategy (TBMS), and would need to consider additional planting and open space to protect and enhance BAP priority habitats and thereby augment opportunities for bat foraging routes and roosting sites including establishing dark corridors through sites. Specific measures that will be required are explained for each site and funding contributions may also be

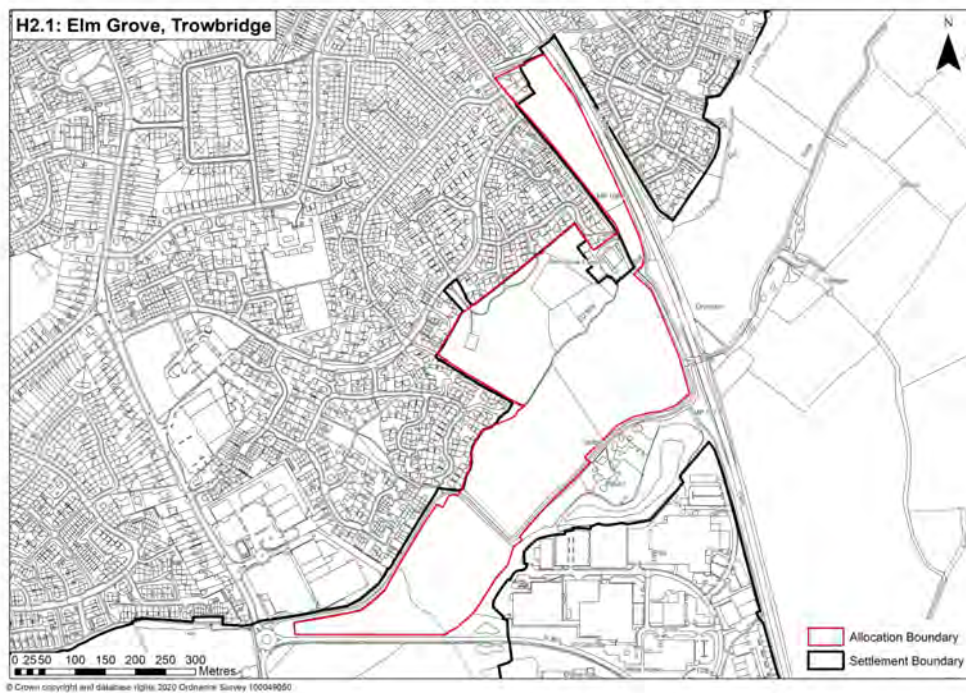
sought towards the delivery of potential offsite measures and monitoring, including new woodland planting and land acquisition to create a Suitable Alternative Natural Greenspace (SANG) to alleviate recreational pressure on core bat habitat, as defined in the Trowbridge Bat Mitigation Strategy.

- **Education:** Funding contributions will be sought from developers to help provide adequate capacity.
- **Health Services:** development will also increase demand for primary health care and funding contributions may also be sought to expand the capacity of GP services and dentistry. Contributions will be justified on a site by site basis in discussion with Clinical Commissioning Group and NHS England.

5.27 The proposed site allocations are capable of delivery and will provide a boost to local housing supply.

H2.1 Elm Grove Farm

Figure 5.2 H2.1 Elm Grove Farm, Trowbridge



5.28 In accordance with the National Planning Policy Framework, the policies of this Plan are strategic in nature. As a whole, the Plan supports the delivery of the Wiltshire Core Strategy.

Policy H2.1

Land at Elm Grove Farm, as identified on the Policies Map, is allocated for mixed use development comprising the following elements:

- approximately 250 dwellings;
- a multi-purpose community facility co-located with existing or improved open space;
- a significantly improved and consolidated public open space area incorporating the existing Queen Elizabeth II Field to provide a play area, junior level sports pitches and changing facilities for local community teams to utilise;
- a road from the A363 through to an improved junction of Drynham Lane and Wiltshire Drive; and
- improvements to cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site and the White Horse Business Park.

Development will be subject to the following requirements:

- sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;
- retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements;
- core bat habitat will be protected or enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);
- appropriate mitigation to protect bats, including financial contributions toward management, monitoring and off-site measures as necessary, as informed by the TBMS; and
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.

Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements and opportunities, delivered to achieve the comprehensive development of the site, including the timely and coordinated provision of necessary infrastructure.

5.29 Approximately 17.61 of land at Elm Grove Farm is allocated for the development of approximately 250 dwellings, along with a multi-purpose community facility co-located with consolidated and improved public open space, as shown on the Policies Map. It is well located with regard to local facilities and services. Moreover, the site is enclosed to the north-west and south-east by existing development and development proposed further south. Consequently, development of the site would not lead to a significant encroachment of further built form into the countryside. Development will include a multi-purpose community building geared toward use by sports and social groups in the area could provide a local centre to the development.

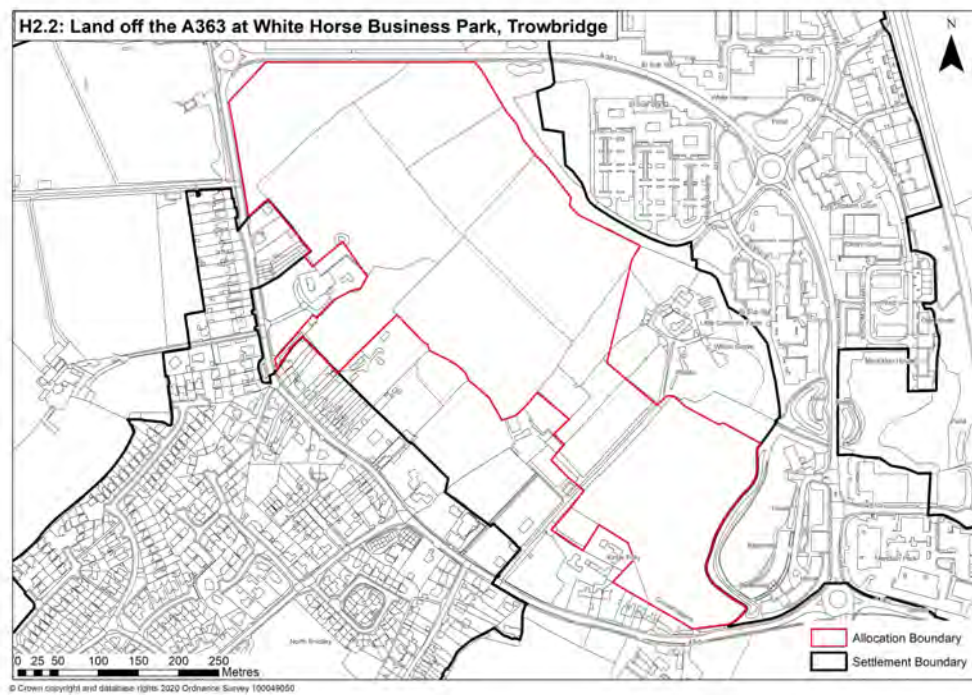
5.30 Proposals to develop the site will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy. The existing natural features of the site are significant in the landscape

and would need to be incorporated within a detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.

- 5.31** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on and adjacent to the site will be identified through survey and assessments guided by the requirements of the TBMS and include: Drynham Lane / Road, the railway line, woodland belts associated with the White Horse Business Park and the small tributary to the River Biss.
- 5.32** These features should be retained and / or buffered from development (including residential gardens) by wide, dark, continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. The design and layout of development, including the size and location of landscape corridors, lighting, other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary.
- 5.33** Access to the site would need to be holistically planned with upgrades required to Drynham Lane, along with the construction of a connection to the A363 designed as a through-route anticipating future traffic growth. New and improved walking and cycling routes to existing and planned local services would encourage future residents to use sustainable forms of transport. The site has a medium potential for archaeological remains. Therefore any subsequent planning application should be informed by an archaeological assessment. In addition, development will need to minimise the potential to harm the significance of the Grade II Listed Drynham Lane Farmhouse along with Grade II listed Southview Farm and, where appropriate, their settings. Measures may also be necessary to prevent potential noise pollution from the existing main road and railway. These considerations should be addressed through the process of detailed design and layout which should be informed by detailed assessments (including heritage) to support any subsequent planning applications.
- 5.34** Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, local GP surgeries and dentistry at the town in accordance with core policies of the Wiltshire Core Strategy.

H2.2 Land off the A363 at White Horse Business Park

Figure 5.3 H2.2 Land off the A363 at White Horse Business Park, Trowbridge



Policy H2.2

Land off A363 at White Horse Business Park, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 175 dwellings;
- vehicular access from the A363;
- development to be directed to the north and east of the site; and
- improvements to cycling and walking routes through the site to link into the existing network.

Development will be subject to the following requirements:

- core bat habitat will be protected and enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation strategy (TBMS);
- appropriate mitigation to protect bats, including financial contributions towards management, monitoring and any off-site measures as necessary, as informed by the TBMS;
- retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, incorporating open space provision. Development will be expected to enhance a key gateway approach to the town and retain visual separation between the town and North Bradley;
- sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments. Development proposals will make a positive contribution towards conserving and enhancing the significance of the Baptist burial ground, its gateway and its setting; and
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.

Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.

5.35 Approximately 20.52ha of land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 175 dwellings, as identified on the Policies Map. It is reasonably well located with regard to services and facilities. The site extends over a significant area of agricultural land used for a mix of grazing and arable cropping. It is contained, to a degree, by existing development to the east and west and fronts a 'gateway' route to the town. An objective of detailed design and layout will be to retain visual separation of the Town's urban area from North Bradley village. To achieve this, development proposals would need to be focused within the north-east of the site, screened with new planting and provide improvements to walking and cycling routes through to the town.

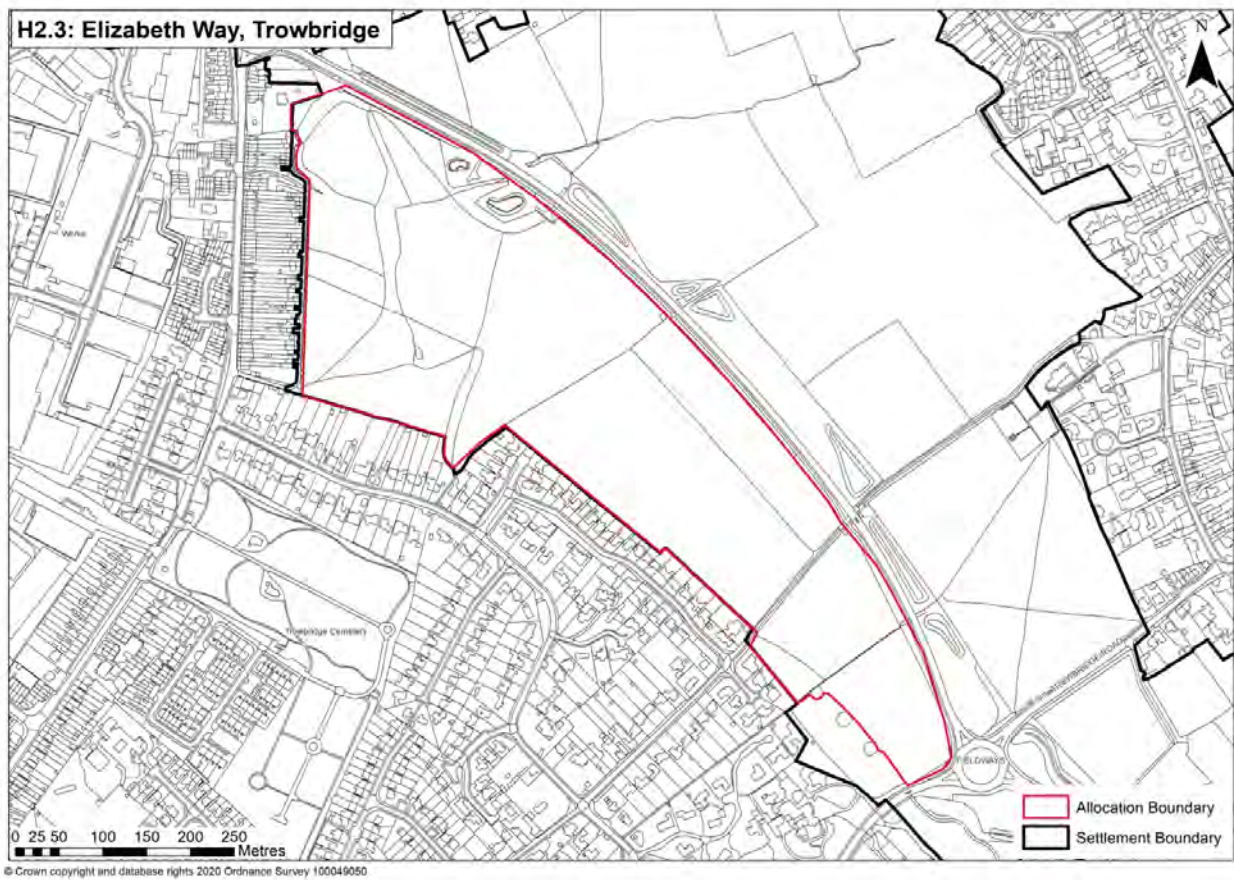
5.36 The site is characterised by a distinctive pattern of mature and semi-mature hedgerows and trees that form a feature in the landscape. Development of the site would need to retain these features and thereby provide a layout that respects the setting of North Bradley village as an important element of detailed design. Existing hedgerows and trees also provide

habitat for protected and non-protected species. These natural features therefore provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats.

- 5.37** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site will be identified through survey and assessments guided by the requirements of the TBMS and include: woodland belts associated with the White Horse Business Park; a network of mature hedgerows/hedgerow trees; and the grounds of Willow Grove.
- 5.38** These features should be retained and / or buffered from development (including residential gardens) by wide, dark, continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. The design and layout of development, including the size and location of landscape corridors, lighting, other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary.
- 5.39** Proposals would need to provide for a high quality, sustainable development that enhances a key gateway approach to the town, whilst protecting the integrity of North Bradley as a village. In addition, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.
- 5.40** As identified in the Council's Heritage Impact Assessment, the site is an historic agricultural landscape and comprises a cluster of historic farmsteads where the farm houses and ancillary buildings may be susceptible to setting change. This includes Kings Farmhouse (Grade II listed), Willow Grove (Grade II listed), Little Common Farm (non-designated asset), Manor Farmhouse (Grade II listed) and Woodmarsh Farm (non-designated asset). An area of the site is also adjacent to a Baptist cemetery with an ornamental gateway structure (Grade II listed) and curtilage listed perimeter walls. A comprehensive approach to development will need to be undertaken that makes a positive contribution towards conserving and enhancing the significance of heritage assets. At the planning application stage, the layout and design of the site must give great weight to conserving the significance of these heritage assets and their setting in order to minimise harm. The Baptist burial ground and gateway is in poor condition and in ensuring that a comprehensive approach is taken to the development of the site a positive contribution will also be required towards conserving and enhancing the significance of this heritage asset and its setting. It will be expected that the developer of the site will work with the Church to ensure that a positive strategy is in place to protect and enhance the Baptist burial ground and gateway. The archaeological potential of the site is likely to be high. Given the potential for heritage assets with archaeological interest to be present within the site, field evaluations will need to be carried out and taken into account in developing proposals, to minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 5.41** Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, local GP surgeries and dentistry at the town in accordance with core policies of the Wiltshire Core Strategy.

H2.3 Elizabeth Way

Figure 5.4 H2.3 Elizabeth Way, Trowbridge



Policy H2.3

Land to the South West of Elizabeth Way, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 355 dwellings;
- vehicular access points from Elizabeth Way; and
- improvements to cycling and walking routes through the site to link into the existing network.

Development will be subject to the following requirements:

- core bat habitat will be protected or enhanced. Design and layout will be informed by appropriate surveys, impact assessments and Trowbridge Bat Mitigation Strategy (TBMS);
- appropriate mitigation, including financial contributions toward management, monitoring and off-site measures as necessary, that will protect bats in accordance with the TBMS;
- sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;
- retention and reinforcement of existing hedgerows and trees as part of wider strategic landscaping and green infrastructure requirements, incorporating noise attenuation measures and open space provision; and
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.

Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.

- 5.42** Approximately 21.24ha of land to the South West of Elizabeth Way is allocated for the development of approximately 355 dwellings, as identified on the Policies Map. The site extends over a significant area of agricultural land quite markedly enclosed by existing development and Elizabeth Way distributor road. The character of the land within the site is relatively open and offers views through the existing urban edge of the town and the village of Hilperton. The dominant feature in the landscape is Elizabeth Way which would serve as access to the site.
- 5.43** Mature and semi-mature hedgerows and trees are key features in the landscape and provide habitat for protected and non-protected species. The existing natural features of the site are significant in the landscape and would be incorporated within the detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.
- 5.44** This site may be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Potentially sensitive habitat features on / adjacent to the site will be identified through survey and assessments guided by the requirements of the TBMS and include: mature trees; hedgerows; and stream (minor watercourse) at the northern end of the site.

- 5.45** These features should be retained and / or buffered from development (including residential gardens) by wide, dark, continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. The design and layout of development, including the size and location of landscape corridors, lighting, other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary.
- 5.46** An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road. Consideration of drainage patterns and flood risk from all sources would need to inform any subsequent layout. In addition, surface water attenuation measures and improvements to existing on-site water infrastructure would need to be provided to support a comprehensive development of the site. Proposals will therefore need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters of layout and design.
- 5.47** The site comprises historic field boundaries and has high archaeological value. It is adjacent to Trowbridge (Hilperton Road) Conservation Area and to Fieldways Highfield (Grade II* listed), a country house. Fieldways Highfield and its setting will need to be conserved in a manner appropriate to its significance. The relationship between development proposals and these heritage assets will need to be rigorously addressed through detailed design including provision for open greenspace in any layout. The layout and design of the site would need to give great weight to the significance of nearby heritage assets and their setting. Where necessary, stand-offs to existing development in Victoria Road, Albert Road and Wyke Road, along with the incorporation of appropriate boundary treatment would need to be considered through detailed layout and design.
- 5.48** There are opportunities to provide new routes for walking and cycling that would also serve the existing built-up area and that could improve connectivity for a wider area of the town. These should be explored and, wherever practicable, provided in order to encourage a reduction in private car journeys.
- 5.49** Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, local GP surgeries and dentistry at the town in accordance with core policies of the Wiltshire Core Strategy.

Policy H2.4

Land at Church Lane, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 45 dwellings to be focused towards the north of the site;
- sensitively designed vehicular access via a new junction arrangement off the A361 that incorporates discreet lighting, signage and boundary treatments to avoid unacceptable harm to heritage assets and their settings; and
- improvements to cycling and walking routes through the site to link to the existing network, including links between the site, Southwick Country Park and the existing network, including improvements to footpath TROW8.

Development will be subject to the following requirements:

- core bat habitat will be protected or enhanced. Design and layout will be informed by appropriate surveys, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);
- appropriate mitigation to protect bats, including financial contributions toward management, monitoring and off-site measures as necessary, as informed by the TBMS;
- retention and enhancement of hedgerows and trees as part of wider landscaping and green infrastructure requirements, and the creation of a publicly accessible Green Infrastructure corridor along the Lambrok Stream to protect and enhance the character, biodiversity value and amenity of Southwick Country Park in conjunction with development at Southwick Court and Upper Studley;
- sensitive design and layout, which ensures the significance of heritage assets and their settings including the contribution made by the paddock adjacent to Church Lane, are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments; and
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.

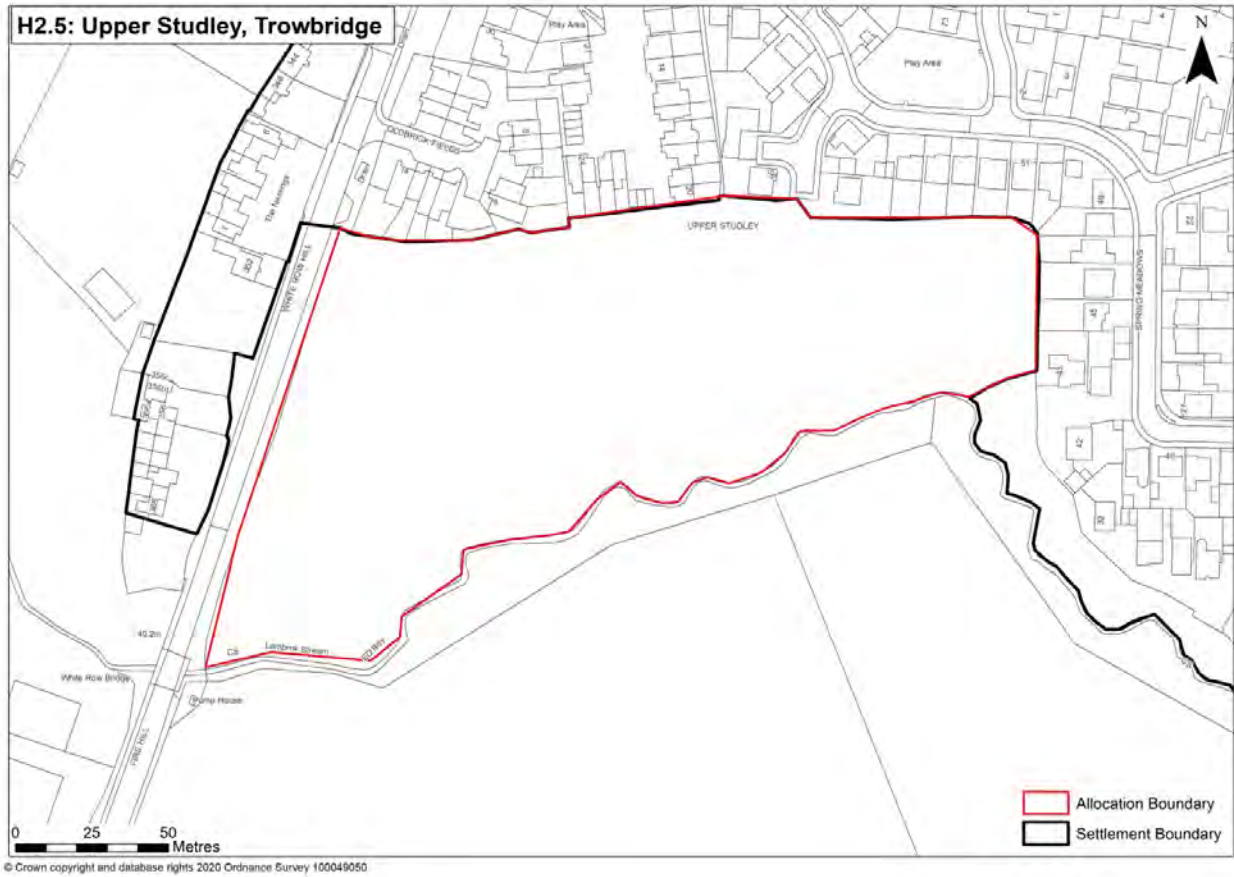
Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site. The cumulative impacts associated with heritage, landscape, ecology and highway access should be taken into account and comprehensively addressed for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively enhances the urban edge of the town.

- 5.50** Approximately 5.93ha of land at Church Lane is allocated for the development of approximately 45 dwellings, as identified on the Policies Map. The site lies on the edge of existing built form and the Southwick Country Park. It is an open site that slopes to the south-west towards the Lambrok Stream. As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management - i.e. tree and hedgerow planting along the south-west margins of the site to slow the flow of surface water into the Lambrok Stream.

- 5.51** The site is adjacent to the Church of St John (Grade II listed), 344 Frome Road (Grade II listed) and paddocks. There are key views across the site to St John's spire from Southwick Country Park. The site comprises the degraded fragmentary remains of a post medieval water meadow system. A comprehensive approach to development will need to be undertaken that makes a positive contribution towards conserving and enhancing the significance of heritage assets. Development should therefore avoid the paddock adjacent to Church Lane and the rear of listed buildings that front Frome Road. The layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting to minimise harm. Access to the site must be sensitively designed and accommodated in a manner that minimises harm to heritage assets, This would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane.
- 5.52** Proposals would need to provide a design and layout that enhances the urban edge of the town. Existing hedgerows and trees would need to be retained and enhanced through new landscaping features along the line of the Lambrok Stream. The Lambrok Stream should be enhanced as a local amenity feature of the site in conjunction with development proposed at Southwick Court and Upper Studley. Such features would need to be of sufficient scale to protect and enhance the character and amenity provided by Southwick Country Park. Links between the site, the Country Park and existing built form would be achieved through improvements to footpath TROW8.
- 5.53** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site will be identified through survey and assessments guided by the requirements of the TBMS and include: Framfield; boundary hedgerows; and the Lambrok Stream.
- 5.54** These features should be retained and / or buffered from development (including residential gardens) by wide, dark, continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. The design and layout of development, including the size and location of landscape corridors, lighting and other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures necessary.
- 5.55** Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, local GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.

H2.5 Upper Studley

Figure 5.6 H2.5 Upper Studley, Trowbridge



Policy H2.5

Land at Upper Studley, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 45 dwellings;
- vehicular access via a new junction arrangement off the A361; and
- improvements to cycling and walking routes through the site to link into the existing network.

Development will be subject to the following requirements:

- core bat habitat will be protected or enhanced. Design and layout will be informed by appropriate survey, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);
- appropriate mitigation to protect bats, including financial contributions towards management, monitoring and off-site measures as necessary, as informed by the TBMS;
- an attractive frontage to A361 and enhancement of this approach to the town;
- retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, and the creation of a publicly accessible Green Infrastructure corridor along the Lambrok Stream to protect and enhance the character, biodiversity and amenity provided by Southwick Country Park in conjunction with development at Southwick Court and Church Lane; and
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.

Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site. Any cumulative issues associated with heritage, landscape, biodiversity and highway access should be considered on a comprehensive and consistent basis for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively addresses the urban edge of the town.

5.56 Approximately 2.27ha of land at Upper Studley is allocated for the development of approximately 45 dwellings, as identified on the Policies Map. The site has a physical relationship to the Lambrok Stream and recently built developments at Silver and Spring Meadows. The land slopes towards the stream and is bound to the south by tall, mature poplar trees. As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management - i.e. tree and hedgerow planting along the southern margins of the site to slow the flow of surface water into the Lambrok Stream.

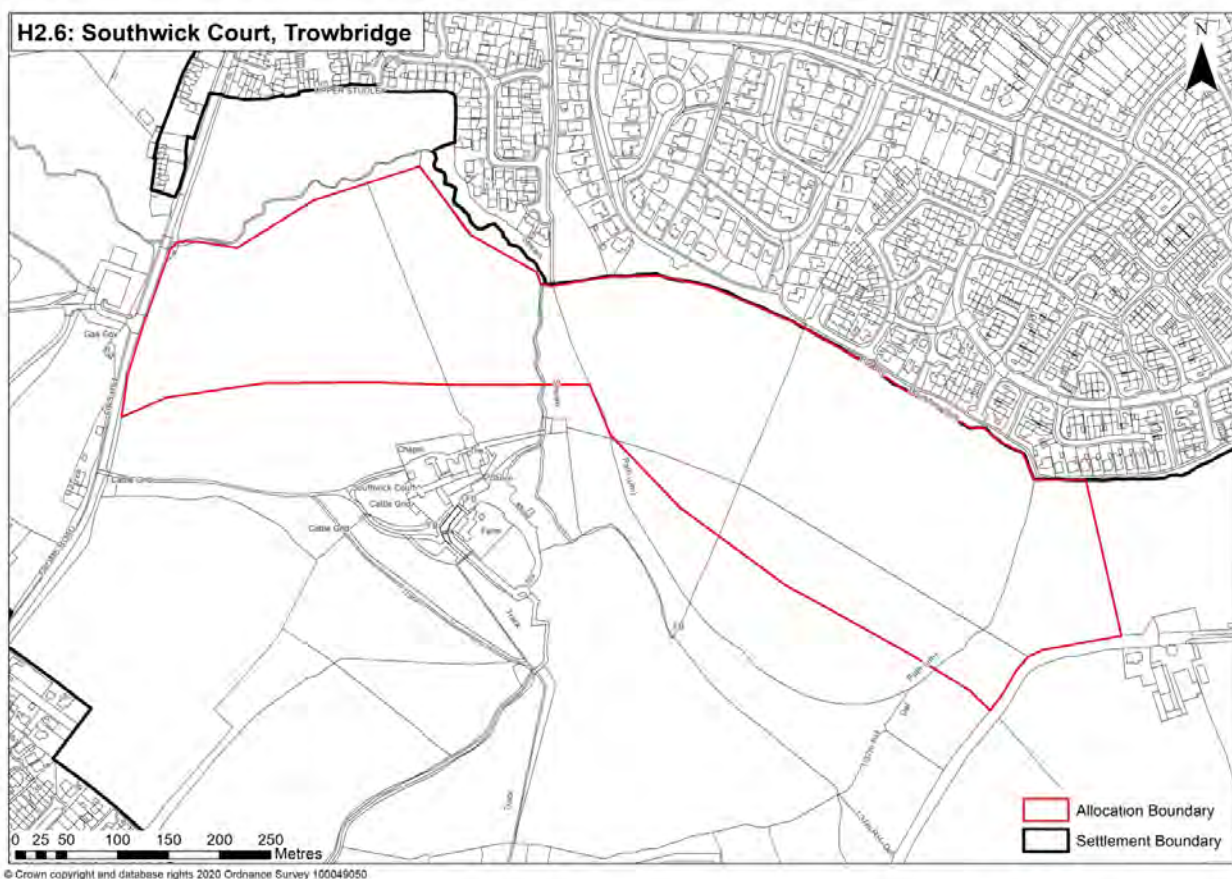
5.57 An objective of detailed design and layout will be to provide an attractive frontage to the A361, that enhances this approach to the town with vehicular access to the A361, along with cycling and walking routes into Trowbridge. The existing natural features of the site are

significant in the landscape and would be incorporated within a detailed layout and Lambrok Stream should be enhanced as a local amenity feature of the site in conjunction with development allocated at Southwick Court and Church Lane.

- 5.58** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: boundary hedgerows / tree lines; and the Lambrok Stream.
- 5.59** These features should be retained and / or buffered from development (including residential gardens) by wide, dark, continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. The design and layout of development, including the size and location of landscape corridors, lighting and other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary.
- 5.60** The masterplan of the site and those prepared to guide development of neighbouring H2.5 and H2.6 must take a joined up approach towards addressing necessary infrastructure and cumulative issues associated with heritage, landscape, biodiversity and highway access through layout and design. Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.

H2.6 Southwick Court

Figure 5.7 H2.6 Southwick Court, Trowbridge



Policy H2.6

Land at Southwick Court, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 180 dwellings;
- a sensitively designed vehicular access from the A361 and road across the site that minimises intrusion within the historic landscape. Signage should be kept to a minimum and particular attention given to reducing any adverse impacts of lighting;
- a controlled emergency vehicular access; and
- improvements to cycling and walking routes through the site to link in to the existing network.

Development will be subject to the following requirements:

- core bat habitat will be protected or enhanced. Design and layout will be informed by appropriate survey, impact assessments and the Trowbridge Bat Mitigation Strategy (TBMS);
- appropriate mitigation to protect bats, including financial contributions toward management, monitoring and off-site measures as necessary, as informed by the TBMS;
- sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. New homes will be situated to the east of the Lambrok Stream and adjacent to the existing urban area in a manner that respects both the topography of the land and existing urban form to the immediate north. Land to the west of the Lambrok Stream will remain open and free from residential development. This shall be informed by appropriate heritage and archaeological assessments;
- a comprehensive approach to landscaping to enhance the urban edge of the town and in so doing protect and enhance the setting of Southwick Court Farmstead;
- retention and enhancement of existing hedgerows and trees as part of wider landscaping and green infrastructure requirements, and the creation of a publicly accessible green corridor along the Lambrok Stream to protect and enhance the character and amenity provided by Southwick Country Park; and
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site.

Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site. Any cumulative issues associated with heritage, landscape, ecology and highway access should be considered on a comprehensive and consistent basis for allocations H2.4, H2.5 and H2.6 to ensure that new development sensitively enhances the urban edge of the town.

- 5.61** Approximately 18.17ha of land at Southwick Court is allocated for the development of approximately 180 dwellings, as identified on the Policies Map. The site extends over a significant area of agricultural land. The character of the land is relatively open and offers views to the north towards the existing urban edge of the town and south over land that forms a natural buffer to maintain the separate identity of the village of Southwick.

- 5.62** The area is of historic significance as water meadows (non-designated heritage asset) associated with the Grade II* Listed Southwick Court Farmstead that lies to the south of the site. The Southwick Court Farmstead is a heritage asset of significant importance. It is a medieval, manorial farmstead that includes a farmhouse, gatehouse and bridge juxtaposed with later post-medieval/modern additions surrounded by a moat. An essential objective of detailed design will be to minimise harm to its significance. The setting to this heritage asset will be preserved, to the greatest extent possible, informed by the Councils Heritage Impact Assessment and the results of further detailed heritage assessment work to support any subsequent planning application. Taking account of the weight attached to the significance of the assets, alone and in combination, any residual harm requires a clear and convincing justification within any subsequent planning application and should not be substantial. The social, environmental and economic advantages of the development, including the provision of homes along with significant improvements to biodiversity and provision of open space will achieve substantial public benefits. A sensitively designed, comprehensive development scheme will need to minimise harm by ensuring that new homes are directed to the east of the Lambrok Stream and built in a manner that respects both the topography of the land and existing urban form to the immediate north. Land to the west may become either formal or informal open space or remain in agricultural use, but will not be developed for new homes. The character of the area will therefore help to retain the high significance of Southwick Court and associated heritage assets. The strategy for accessing the site must respect the significance of Southwick Court and the wider historic landscape it occupies. The road across the site and junction off the A361 (Frome Road) will therefore need to be sensitively designed and built in a manner that acknowledges the requirement to minimise intrusion within the historic landscape. Signage and lighting will be kept to a minimum and particular attention given to reducing any adverse impacts of lighting throughout the development. In addition, the creation of access specifically for emergency vehicles will need to be sensitively designed to ensure that the removal of any existing trees/hedgerows on the northern site boundary is kept to a minimum and must have regard to biodiversity / landscape / heritage assets.
- 5.63** Landscaping will be an important element of any subsequent scheme. The site represents an expansion of the town into the countryside. Development would therefore replace a substantial length of the town's existing urban edge. To address the impact of change in the landscape a comprehensive landscape treatment would provide an opportunity to improve the impact of the town on the wider landscape and in so doing protect and enhance the Southwick Court Farmstead. The Lambrok Stream and its respective flood plain should be enhanced as a local amenity feature of the site in conjunction with development proposed at Upper Studley and Church Lane. As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management - i.e. tree and hedgerow planting along the northern margins of the site to slow the flow of surface water into the Lambrok Stream and associated field drainage systems.
- 5.64** Mature hedgerows and trees (including a solitary veteran Oak tree) are a key feature in the landscape and provide habitat for protected and non-protected species. The existing natural features of the site are significant in the landscape and would be incorporated within a detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.

- 5.65** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site will be identified through survey and assessments guided by the requirements of the TBMS and include: boundary hedgerows / tree lines; Axe and Cleaver Lane; the Lambrok Stream; and the moat and grounds at Southwick Court.
- 5.66** These features should be retained and / or buffered from development (including residential gardens) by wide, dark, continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. The design and layout of development, including the size and location of landscape corridors, lighting, other physical mitigation measures and management protocols, will be informed by the guidance set out in the TBMS and from appropriate surveys and assessments. Development may also be subject to requirements relating to off-site mitigation, management and monitoring measures as necessary.
- 5.67** Opportunities to improve walking and cycling routes through the existing built framework should be explored and, wherever practicable, new and improved routes provided in order to encourage a reduction in private car journeys and, in particular, to promote access to the wider countryside.
- 5.68** The masterplan for the site and those prepared to guide the development of neighbouring sites H2.4 and H2.5 must take a joined up approach towards addressing necessary infrastructure and cumulative issues associated with heritage, landscape, biodiversity and highway access through layout and design. Appropriate contributions would be likely to be sought to help fund an increase in capacity at local school, local GP surgeries and dentistry at the town in accordance with core policies of the Wiltshire Core Strategy.

Warminster

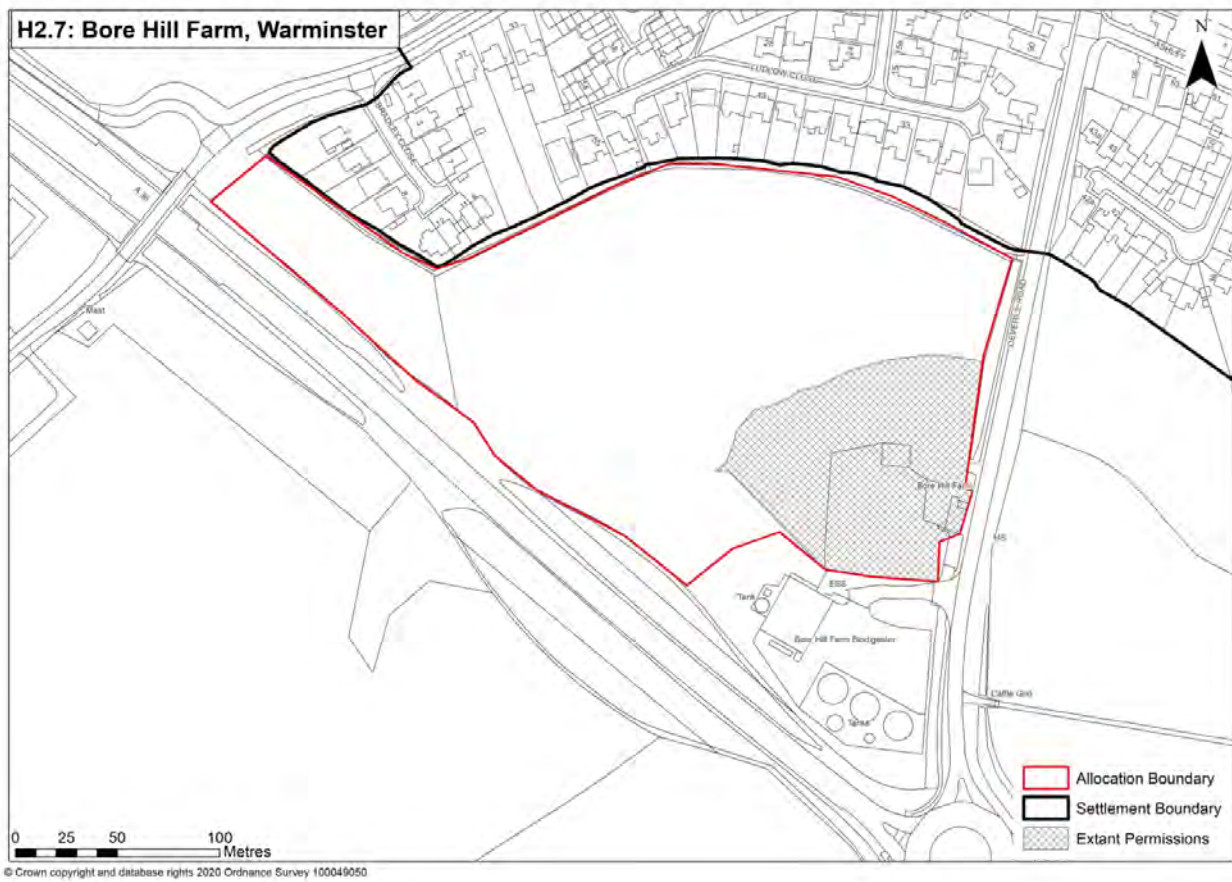
- 5.69** Warminster is a Market Town and has the potential to accommodate significant levels of development. As anticipated by the settlement strategy, an increase in jobs and homes in the town would help to enhance services and facilities and promote better levels of self-containment. The WCS envisages Warminster accommodating approximately 1,920 additional dwellings over the plan period (2006 to 2026).
- 5.70** Surface water management at Warminster is a particular issue. Developments will be supported by comprehensive Drainage Strategies that ensure the development will result in improved drainage conditions. Sufficient land will also need to be set aside for surface water management measures.
- 5.71** Development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss / damage. As such, a Nutrient Management Plan seeks to avoid the likelihood of adverse effects. Nevertheless, impacts are kept under review and this situation may change. For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which is defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC. Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in an annex to the Nutrient Management Plan.
- 5.72** In March 2018, Natural England and the Environment agency advised the Council that new development within the River Avon catchment must be phosphate neutral until mechanisms can be put in place to ensure phosphate concentrations in the river do not increase unacceptably as a result of development. The Council has therefore worked with these

bodies to agree an Interim Delivery Plan (IDP) which will take phosphate out of the catchment at a rate and spatial distribution broadly similar to patterns of development. Phosphate reductions will partly be reduced through a requirement for new development to reduce domestic water consumption, but it will also deliver measures such as new wetlands, less intensive agriculture and on-farm silt reduction measures. The IDP will be funded through CIL and delivery will be kept under review by the Working Group. Where local or short-term deficiencies emerge, bespoke mitigation may be required of developers.

5.73 Developments will be required to address any direct or indirect cumulative impacts on the A36.

H2.7 Bore Hill Farm, Warminster

Figure 5.8 H2.7 Bore Hill Farm, Warminster



Policy H2.7

Land at Bore Hill Farm, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 70 dwellings;
- vehicular access from Deverill Road;
- B1 employment, located between the bio-digester and residential development; and
- improvements to cycling and walking routes through the site to link into existing network (including WARM60).

Development will be subject to the following requirements:

- noise, dust and odour assessments to inform design and layout to separate the built form and sensitive land uses from the adjoining waste management facility. Development will not be permitted where assessments conclude that a satisfactory living environment for residents cannot be created;
- screening will be provided that has given due consideration to the operational waste management facility (bio-digester). Additional landscape screening at site boundaries to preserve amenity of adjoining residential dwellings; and
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site.

Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.

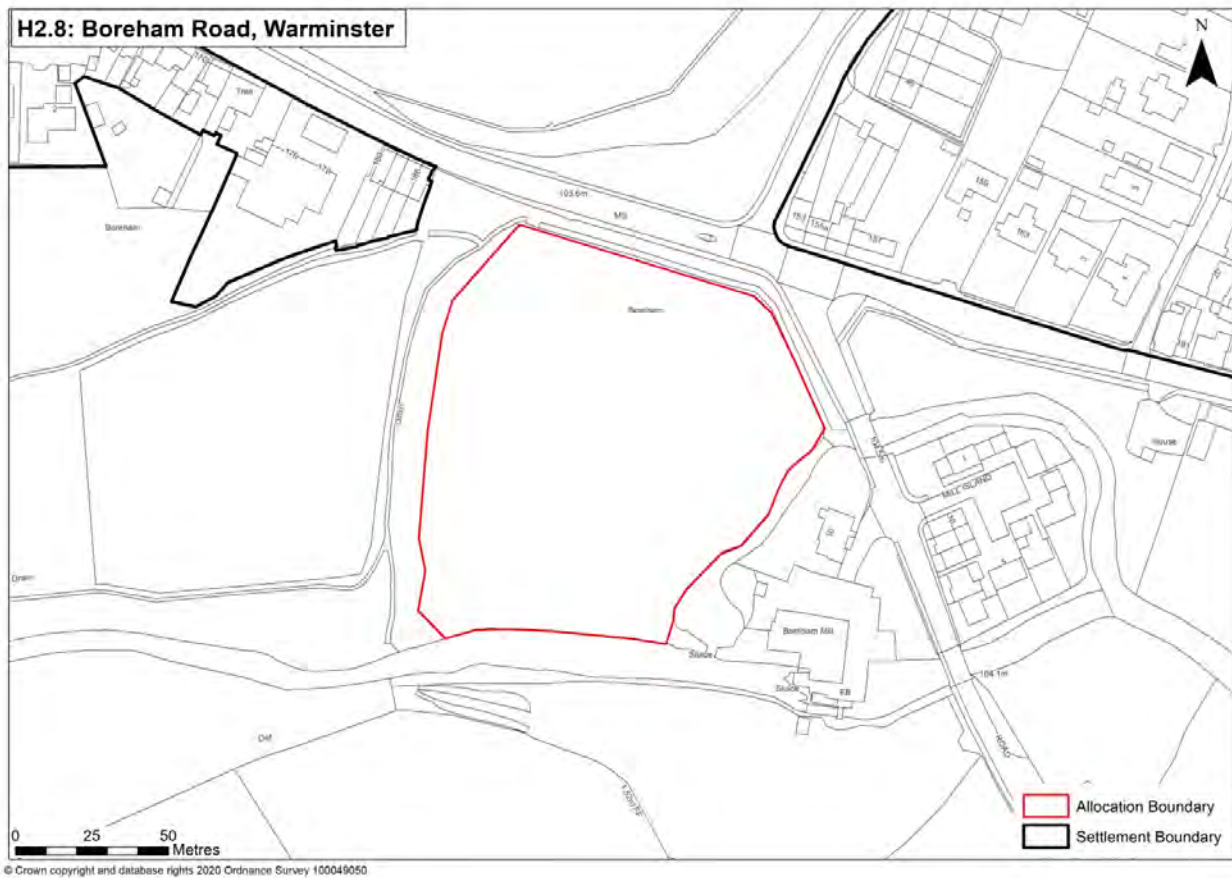
- 5.74** Approximately 4.83ha of land at Bore Hill Farm/Bradley Road, as shown on the Policies Map, is allocated for the development of approximately 70 dwellings.
- 5.75** The site is formed of land between the A36 and Deverill Road which lies adjacent to the Bore Hill Farm bio-digester. Considering the site context, any subsequent development proposals (e.g. layout and screening) will need to take account of potential issues associated with the operational waste management facility, these may include: noise, dust and odour. There is some limited screening on the north boundary with existing development at Bradley Close and Ludlow Close. Additional landscape screening at the site boundaries would be required to preserve and maintain the living conditions of adjoining residential dwellings. Vehicular access will be provided from Deverill Road, and connection to and improvement of public right of way WARM60 should be provided. In addition, development proposals will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change).
- 5.76** The site area includes land at Bore Hill Farm which benefits from extant planning permission for the development of B1 employment units⁽¹⁴⁾. In order to retain the employment generating use of this part of the site, in line with Warminster Neighbourhood Plan Policy W1, development would include approximately 70 dwellings together with B1 employment use. Provision for employment use as part of the development will take the form of land, equivalent in extent to that part of the current planning permission within the allocation, being reserved

and marketed as serviced land. It would be located between the operational bio-digester and proposed residential development, to provide separation between these uses. A noise assessment would form part of the planning application process and to inform detailed design and layout.

5.77 Future development of the site shall be brought forward in such a way that ensures the residential and employment uses on the site are compatible. In line with WCS Core Policy 41, opportunities should be explored for new development to use energy generated by the adjoining biodigester. Appropriate contributions may also be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.

H2.8 Boreham Road

Figure 5.9 H2.8 Boreham Road, Warminster



Policy H2.8

Land at Boreham Road, as identified on the Policies Map, is allocated for development comprising of the following elements:

- approximately 30 dwellings;
- access will be provided from Boreham Road; and
- improvements to cycling and walking routes through the site to link into the existing network including the reconstruction of pedestrian footways onto Boreham Road.

Development will be subject to the following requirements:

- sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;
- measures to safeguard protected species and habitats of importance for biodiversity, including the retention and enhancement of trees and hedgerows as wildlife corridors as informed by an ecological assessment; and
- measures to protect the integrity of the River Avon SAC, with particular regard to phosphate discharge into the River Avon and its tributaries. This will be informed by appropriate survey and impact assessment; and
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site.

Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.

- 5.78** Approximately 1.32ha of land at Boreham Road, as shown on the Policies Map, is allocated for the development of approximately 30 dwellings. It has previously been considered as an opportunity to provide for self build homes and this remains the preferred form of development.
- 5.79** The site comprises relatively low grade agricultural meadow land that, in part, has been used for the disposal of builders' rubble and spoil. It is well contained and framed by existing mature hedgerows and trees. These features provide important habitat corridors and should therefore be retained, protected and, where possible, enhanced through additional planting.
- 5.80** Whilst situated outside the Bishopstrow Conservation Area, the site is considered to lie within the setting of this designated heritage asset. Development of the site would therefore need to respond positively to its surroundings and have due regard to the special character or appearance of the Conservation Area. In line with national policy, an assessment of heritage assets and their significance (including the contribution made by their setting) would be required in order to support and inform any subsequent proposals, including the design of mitigation measures. The setting of heritage assets will be protected so as to ensure, as far as practicable, there will be no substantial harm to their significance.
- 5.81** Parts of the site lie within Flood Zones 2 and 3. Therefore development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy and water infrastructure

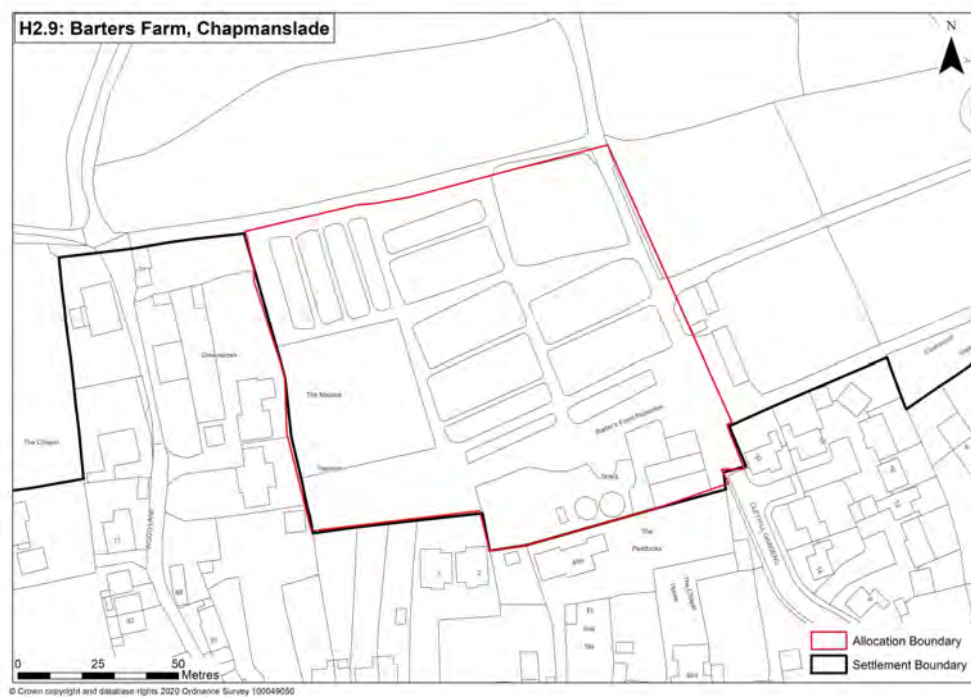
capacity assessment. Where necessary, details relating to the reinforcement of existing foul/storm water drainage arrangements will need to be submitted with any subsequent planning application.

- 5.82 Vehicular access would be achieved from Boreham Road. Details relating to the provision of the junction arrangements; culvert arrangements; closure of exiting agricultural field gate and reconstruction of pedestrian footways onto Boreham Road would need to be submitted with any planning application. Appropriate contributions would be likely be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.

Warminster Community Area Remainder

H2.9 Barbers Farm, Chapmanslade

Figure 5.10 H2.9 Barbers Farm, Chapmanslade



Policy H2.9

Land at Barters Farm, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 35 dwellings;
- vehicular access from Cleyhill Gardens; and
- improvements to cycling and walking routes through the site to link into the existing network including CHAP14.

Development will be subject to the following requirements:

- retention and enhancement of trees and hedgerows as part of wider landscaping and green infrastructure requirements;
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site;
- an ecological assessment to inform design and layout of the development, along with on and off-site mitigation and monitoring measures as appropriate due to its location within the core buffer area of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC); and
- an archaeological assessment to inform site layout.

Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.

- 5.83** Chapmanslade is designated as a Large Village where an appropriate level of development is anticipated in order to meet housing needs and improve employment opportunities, services and facilities. Development will provide affordable homes and improved cycling and walking routes to the heart of the village, thereby contributing towards the delivery of the Warminster Community Area Strategy, as anticipated by the WCS.
- 5.84** Approximately 1.35ha of Land at Barters Farm is allocated for the development of approximately 35 dwellings, as identified on the Policies Map. As a former nursery and garden centre, development does not result in the loss of agricultural land and open countryside. Within the context of the village, the site is well located and avoids adversely impacting on ecological features such as Ancient Woodland that lies on the periphery of much of the settlement. Public right of way CHAP14 runs along the northern boundary of the site. This will be retained and enhanced through the development of the site. Considering the size of the site, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.
- 5.85** The site is within the core buffer area of the Bath and Bradford On Avon Bats Special Area of Conservation (SAC), as set out in Planning Guidance, and therefore there may be potential for bats to use the site and so mitigation measures such as new tree/hedgerow planting may be necessary. An ecological assessment will be required to identify potential impacts and

set out appropriate mitigation. This may include the need to make financial contributions in relation to off-site mitigation measures. There is also potential for archaeological remains, therefore this too would need full assessment.

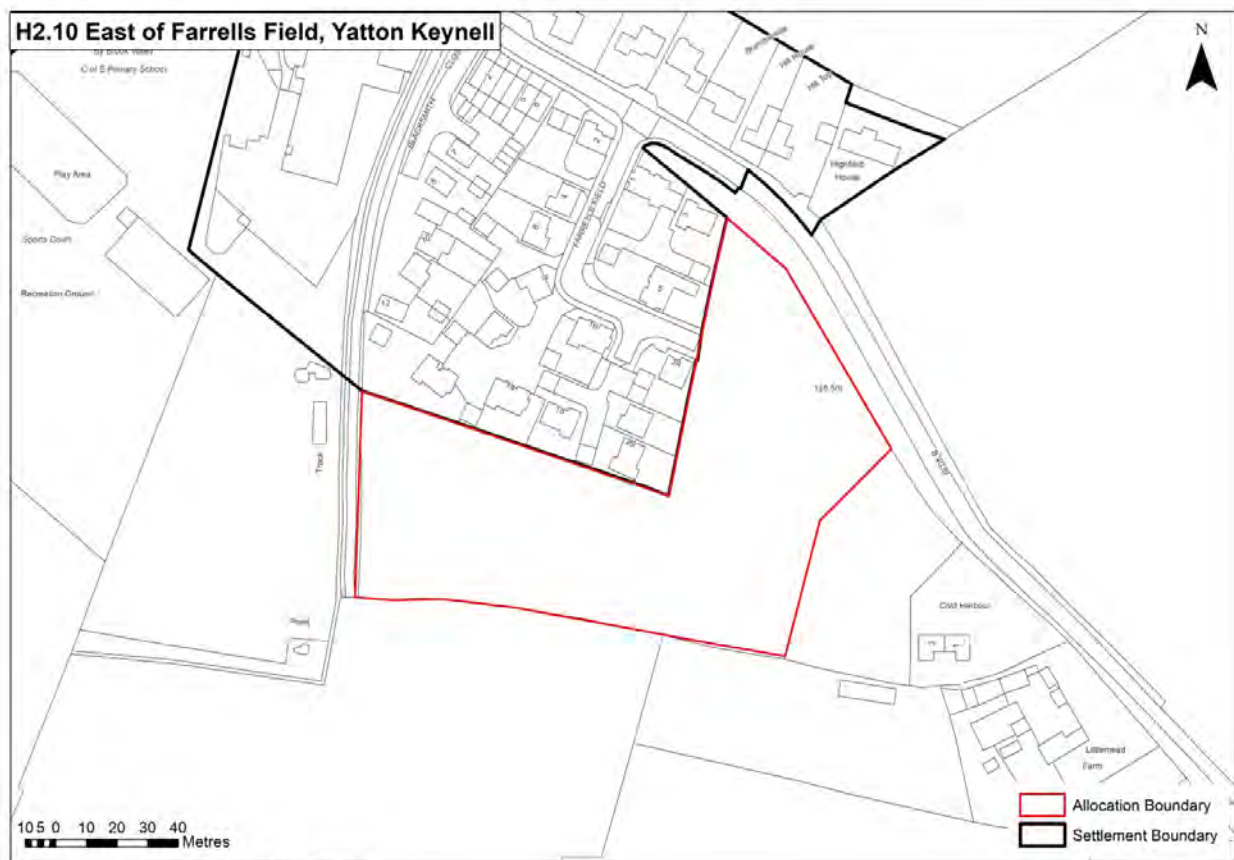
5.86 Additional screening on the site boundaries will be required in order to preserve and maintain landscape quality and edge of settlement setting, and to protect the amenity of adjoining residential dwellings.

5.87 In order to facilitate development, appropriate contributions would likely be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.

Chippenham Community Area Remainder

H2.10 East of Farrells Field, Yatton Keynell

Figure 5.11 H2.10 East of Farrells Field, Yatton Keynell



© Crown copyright and database rights 2020 Ordnance Survey 100049050

Policy H2.10

Land to the east of Farrells Field, Yatton Keynell, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 30 dwellings;
- vehicular access from B4039; and
- improvements to cycling and walking routes through the site to link into the existing network.

Development will be subject to the following requirements:

- retention and enhancement of trees and hedgerows as part of wider strategic landscaping and green infrastructure requirements, incorporating open space provision;
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design so that surface water is controlled and does not exacerbate flooding off-site; and
- an integrated water infrastructure strategy to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off-site.

Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.

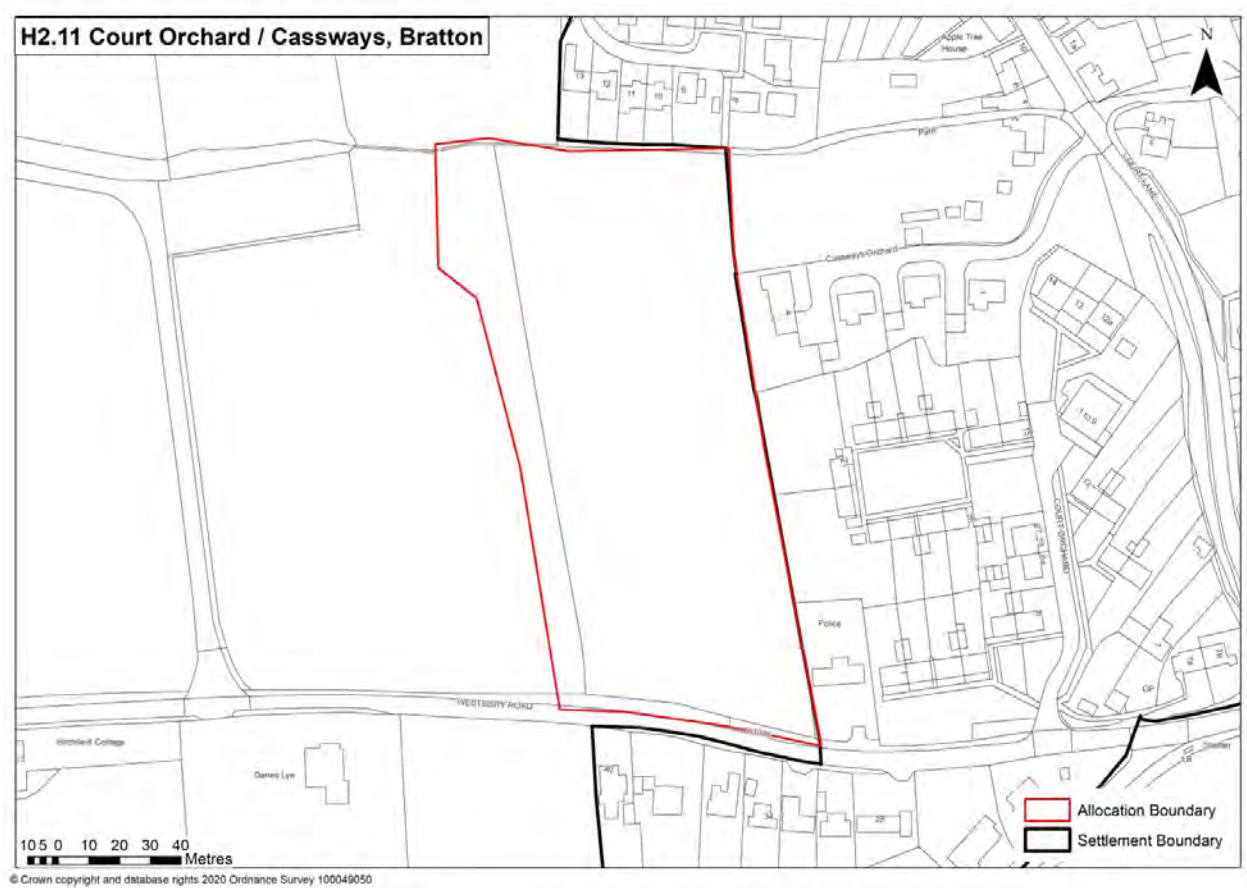
- 5.88** Yatton Keynell is designated as a Large Village where development is limited to meet local needs. Much of the land around the settlement is within the Cotswolds AONB and development at the village is constrained by the importance of the need to conserve the qualities of the designation. An allocation of land that avoids the designation provides for local needs and supports the role of the settlement.
- 5.89** Land East of Farrells Field, Yatton Keynell is allocated for the development of approximately 30 dwellings on approximately 1.2ha of land, as shown on the Policies Map. Considering the size of the site any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design. In addition, as the site lies within Groundwater Protection Zone 2 development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy. An integrated water infrastructure strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off-site. The site is well located with regard to local services and facilities. It is in agricultural use and represents the continuation of recent development in this part of the settlement.
- 5.90** Retention of the existing boundary vegetation on site would provide screening to reduce the effect on adjacent visual receptors and be in keeping with the existing landscape character. The possibility to link to adjacent footpaths should be explored.

5.91 Appropriate contributions would be likely to be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance with core policies of the Wiltshire Core Strategy.

Westbury Community Area Remainder

H2.11 Court Orchard/ Cassways, Bratton

Figure 5.12 H2.11 Court Orchard / Cassways, Bratton



Policy H2.11

Land at Court Orchard/Cassways, as identified on the Policies Map, is allocated for development comprising of the following elements:

- approximately 35 dwellings;
- vehicular access from B3098; and
- improvements to cycling and walking routes through the site to link into the existing network including BRAT24 and BRAT25.

Development will be subject to the following requirements:

- development will be informed by an ecological assessment detailing suitable mitigation measures to ensure the safeguarding of protected species and habitats of importance for biodiversity;
- retention and enhancement of trees and hedgerows on the site boundaries as part of wider landscape and green infrastructure requirements. Development will be expected to take particular care to ensure that a suitable boundary with the open countryside is provided that protects or enhances landscape quality and the setting of the edge of the settlement;
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site; and
- sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments.

Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.

- 5.92** Bratton is designated as a Large Village where some development is acceptable to meet housing needs and to improve employment opportunities, services and facilities.
- 5.93** Approximately 1.61ha of land at Court Orchard/Cassways is allocated for the development of approximately 35 dwellings, as identified on the Policies Map.
- 5.94** The site comprises a roughly rectangular field that slopes down towards the north. The site is situated on the edge of Bratton, and is within a Special Landscape Area. A part of the site also adjoins the Bratton Conservation Area. In addition, due to the proximity of Bratton Camp Scheduled Monument and the prehistoric / medieval potential at this location, heritage and archaeological assessments will be required to support a planning application.
- 5.95** Trees and hedgerows on the sites boundaries are important wildlife corridors and have ecological importance. Consequently they should be retained, protected and where necessary, enhanced through additional planting.

- 5.96** Additional screening at the site boundaries would be required to preserve and enhance the landscape quality, Conservation Area and edge of settlement setting, and to protect the amenity of adjoining residential dwellings. A new visual boundary to the settlement will need to be established along the site's western edge. This should respect the existing landscape value and character of the area, while ensuring a suitable transition between the village and open countryside.
- 5.97** Considering the size of the site and the fact that part of the land is susceptible to surface water flooding, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.
- 5.98** Access would be from the B3098. Improved connections to adjoining public rights of way BRAT24 and BRAT25 should be facilitated through any subsequent development proposals.
- 5.99** Appropriate contributions would likely be sought to help fund an increase in capacity at local schools, GP surgeries and dentistry in the town in accordance core policies of the Wiltshire Core Strategy.

South Wiltshire Housing Market Area

- 5.100** Land for housing development is identified to ensure supply, support the role of settlements in the South Wiltshire HMA, and improve choice and competition in the market for land. Evidence suggests a need for a greater intervention by the Plan with regard to the South Wiltshire HMA in order to ensure a continuity of land supply⁽¹⁵⁾.
- 5.101** As a Principal Settlement, the WCS anticipates that Salisbury will be a primary focus for development. Moreover, the role of the city as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026. Additional allocations are therefore made to support this role.
- 5.102** Other allocations are made at Durrington, a Market Town with Amesbury and Bulford, to supports its role. The following sites are allocated for development:

Table 5.3 Housing Allocations in the South Wiltshire Housing Market Area

Community Area	Reference	Site Name	Approximate number of dwellings
Salisbury	H3.1	Netherhampton Road, Salisbury	640
	H3.2	Hilltop Way	10
	H3.3	North of Netherhampton Road	100
	H3.4	Land at Rowbarrow	100
	H3.5	The Yard, Hampton Park	14
Amesbury	H3.6	Clover Lane, Durrington	45
	H3.7	Larkhill Road, Durrington	15

- 5.103** How these sites were selected is explained in the Community Area Topic Papers published alongside this Plan.
- 5.104** The specific requirements and form development will take are described below for each site to ensure they are each appropriate in scale and character to their location and in accordance with WCS and national policy.

Salisbury

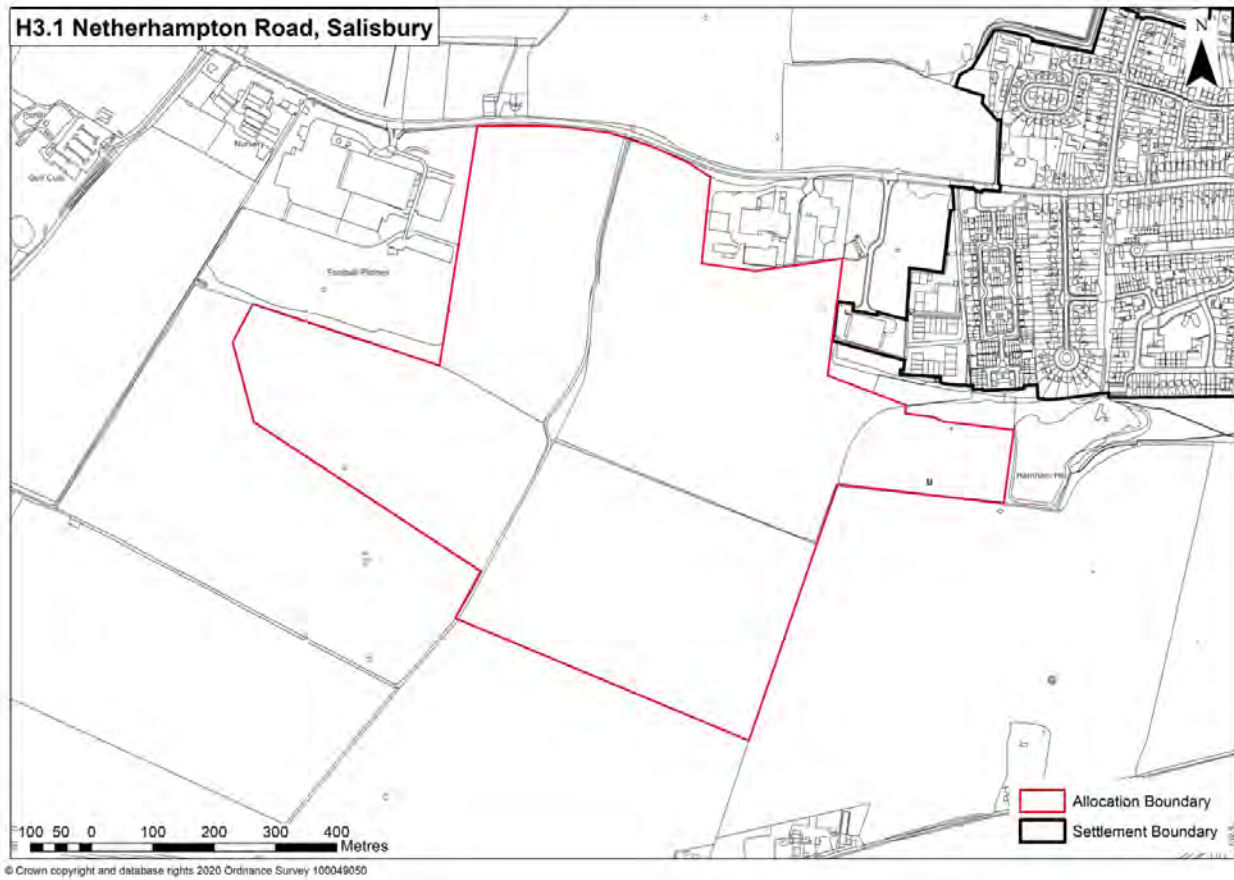
- 5.105** Salisbury is designated as a Principal Settlement in the Wiltshire Core Strategy and is a strategically important centre and a primary focus for development. Significant levels of jobs and homes should be provided in Principal Settlements, together with supporting community facilities and infrastructure, to meet their economic potential and to support self-containment (Core Policy 1). The WCS envisages Salisbury, with Wilton, accommodating approximately 6,060 dwellings over the plan period (2006 to 2026).
- 5.106** Assessment evidence demonstrates three considerations to be addressed in order for housing development to be accommodated:

15 Topic Paper 3: Housing Land Supply, paragraph 3.26, Wiltshire Council (July 2017)

- **Transport:** development inevitably has impacts on the local transport network. The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS. Plan allocations crystallise the pattern growth takes up to 2026 and the refresh of the Salisbury Transport Strategy (2018) has reviewed the effectiveness of existing measures and proposes new ones to accommodate growth. Development will contribute to these wider network measures, where necessary, alongside measures that are implemented expressly as part of specific development proposals.
- **Education:** development will increase the number of pupils needing primary school places. A lack of capacity across the City affects proposals allocated for development. The evidence points to the need for a new primary school. Therefore, in addition to land reserved for one new school, funding contributions will be sought from developers to help provide adequate capacity.
- **Biodiversity:** development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss / damage. As such, the Nutrient Management Plan seeks to avoid the likelihood of adverse effects. Nevertheless, impacts are kept under review and this situation may change. For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC. Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in an annex to the Nutrient Management Plan.

H3.1 Netherhampton Road, Salisbury

Figure 5.13 H3.1 Netherhampton Road, Salisbury



Policy H3.1

Land at Netherhampton Road, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 640 dwellings;
- sensitively designed vehicular access from the A3094 Netherhampton Road with minimal signage and lighting to ensure views of Salisbury Cathedral spire are not subject to unacceptable harm;
- measures to positively support walking, cycling and public transport use between the site and Salisbury, including improvements to bridleway NHAM10;
- at least 1.8ha of land for a two-form entry primary school along with playing pitches;
- a local centre of an appropriate scale to provide local access to services and facilities; and
- a Country Park of at least 10ha in size, with associated parking and facilities, located in the east and south of the site, with associated parking and facilities, provision of strategic landscaping and appropriately located public open space and green infrastructure throughout the rest of the site.

Development will be subject to the following requirements:

- design and layout to be guided by appropriate heritage and archaeological assessments;
- all built development to be located below the 75m contour;
- provision made for transport network improvements necessary to accommodate the scale of development envisaged, as identified through a comprehensive transport assessment;
- contributions towards education and on or off-site healthcare capacity to meet the needs created by the development;
- measures to safeguard the interest of Harnham Hill Chalk Pit SSSI and Harnham Slope County Wildlife Site;
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design of the site so that surface water is controlled and does not exacerbate flooding off-site;
- measures to protect the integrity of the River Avon SAC, with particular regard to phosphate discharge into the River Avon and its tributaries. This will be informed by appropriate survey and impact assessment;
- provision made for improvements to local sewerage systems, informed by a water infrastructure capacity appraisal; and
- surface water management, to include comprehensive surface water drainage measures (including a sustainable drainage system), that achieves equivalent or better than current greenfield rates of run-off.

Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.

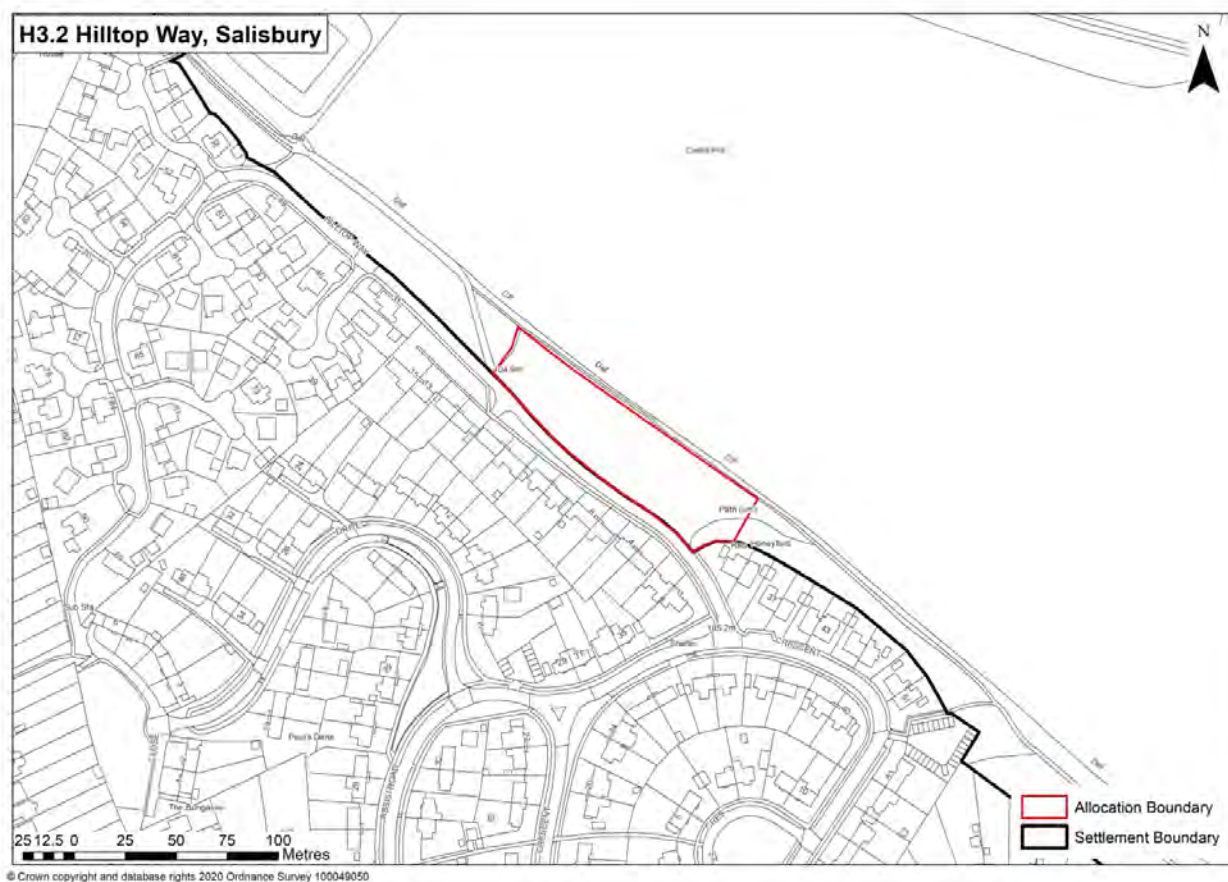
- 5.107** Approximately 63ha of land to the south of Netherhampton Road, as shown on the Policies Map, is allocated for development of approximately 640 dwellings, a new two-form of entry primary school and a local centre of an appropriate scale to provide local access to services and facilities, including a convenience store and potentially healthcare facilities if provided on-site. An impact assessment will be required in line with Core policy 38 of the Wiltshire Core Strategy. All built development will be below the 75m contour and a scheme will include a Country Park and extensive planting. Development of this site represents necessary growth to support the delivery of housing at Salisbury and thereby contribute towards land supply within the South Wiltshire Housing Market Area.
- 5.108** The site was originally included in the draft South Wiltshire Core Strategy as a strategic allocation. Whilst the Examination of that plan led to the site not being allocated for development due to a reduction in housing requirements, it was nonetheless considered suitable as a strategic allocation and referenced as a potential site for consideration if, or when the need for additional housing arises. Accordingly, the site is referenced in paragraph 5.112 of the Wiltshire Core Strategy as a site that should be considered if further land is needed to meet housing requirements, and the site has now been confirmed as a preferred location for growth having been assessed through a sustainability appraisal which assessed a number of reasonable alternative sites around Salisbury.
- 5.109** In order to facilitate development, there is a requirement for a new primary school to be provided on site. Accordingly, a minimum of 1.8ha of land is reserved within the scheme in order to accommodate a two form entry primary school. Development will also increase demand for primary healthcare facilities (GP services) in Salisbury. Additional provision would need to be provided to address limited capacity and support planned growth. This may be delivered on-site or off-site by funding contributions towards and/or provision of health facilities, in accordance with core policies of the Wiltshire Core Strategy.
- 5.110** This location has capacity to accommodate change from an environmental and landscape perspective. There are no landscape, biodiversity or heritage designations within the site. The edge of the Cranborne Chase and West Wiltshire Downs AONB lies approximately 2km south-west of this site and no significant impacts on the AONB are considered likely. Mitigation is considered achievable to reduce any potential adverse landscape effects, including on visual connections to local landmark features e.g. Salisbury Cathedral, Old Sarum and Netherhampton Church, through significant provision of appropriately located public open space and green infrastructure, with new residential development located in the northern part of the site and restricted to below the 75m contour line. Substantial new tree planting will reflect typical Downland characteristics.
- 5.111** The archaeological potential of the site is demonstrably high. The site includes prehistoric barrows, field systems and enclosures. At the planning application stage, the layout and design of the development will need to give great weight to conserving heritage assets and their setting in a manner proportionate to their significance. The site has been subject to archaeological assessment, geophysical survey and evaluation trenching, with archaeological interest shown to be present across the site. These investigations should inform the masterplan for the site.
- 5.112** West Harnham Chalk Pit Site of Special Scientific Interest (SSSI) and Harnham Slope County Wildlife Site (CWS) should be protected. Potential additional recreational use will be positively managed. Sufficient areas of public open space should be incorporated into a layout and design in order to protect these sites by providing attractive, alternative areas for recreation. To support this objective, a significant sized Country Park will be provided in the south and east of the site for recreational use by the public as part of open space and green

infrastructure provision. Additional planting will go some way to counteract the phosphate loading and resulting pressures on the River Avon SAC that development will create. An objective of the site will be to offset fully all potential for harm.

- 5.113** Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. Accordingly, contributions towards these improvements will likely be sought. To address such matters, dialogue with Highways England will be required and work would take place in conjunction with the Salisbury Transport Strategy Refresh (2018). Mitigation measures will be guided by evidence from a robust and comprehensive transport assessment which will need to be undertaken by any future applicant, the scope of which is to be agreed by Wiltshire Council and Highways England. The assessment would fully investigate detailed transport impacts of the development on the wider Salisbury transport network, especially on the A36T, and identify appropriate measures to safely accommodate additional traffic emanating from the new development.
- 5.114** In addition, measures to positively promote and support cycling, walking and public transport use would also need to be addressed through any subsequent planning application process. This too would be undertaken in conjunction with the Salisbury Transport Strategy refresh (2018) that takes account of planned strategic growth of Salisbury. The site is reasonably well located in relation to the city centre and development should include measures to enable as many trips as possible to the city centre to take place on foot, cycling or by public transport. The bridleway leading from the site (NHAM10) is likely to be a key route for people walking and cycling from the site connecting to the Old Shaftesbury Drove and into Harnham. Development of the site should include suitable surfacing of this route throughout the site.
- 5.115** A water infrastructure capacity appraisal will be needed to confirm the scope and extent of works to service new development. This should include the capacity of local sewer systems. Bearing in mind the size of the site, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design. Sufficient land would need to be set aside for robust surface water management, to include comprehensive Surface Water Drainage measures (including a Sustainable Drainage System) that results in run-off rates equalling, or bettering current greenfield infiltration rates.

H3.2 Hilltop Way, Salisbury

Figure 5.14 H3.2 Hilltop Way, Salisbury



Policy H3.2

Land at Hilltop Way, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 10 dwellings;
- vehicular access via Hilltop Way; and
- the public right of way forming the northern boundary of the site should be maintained and its route enhanced.

Development will be subject to the following requirements:

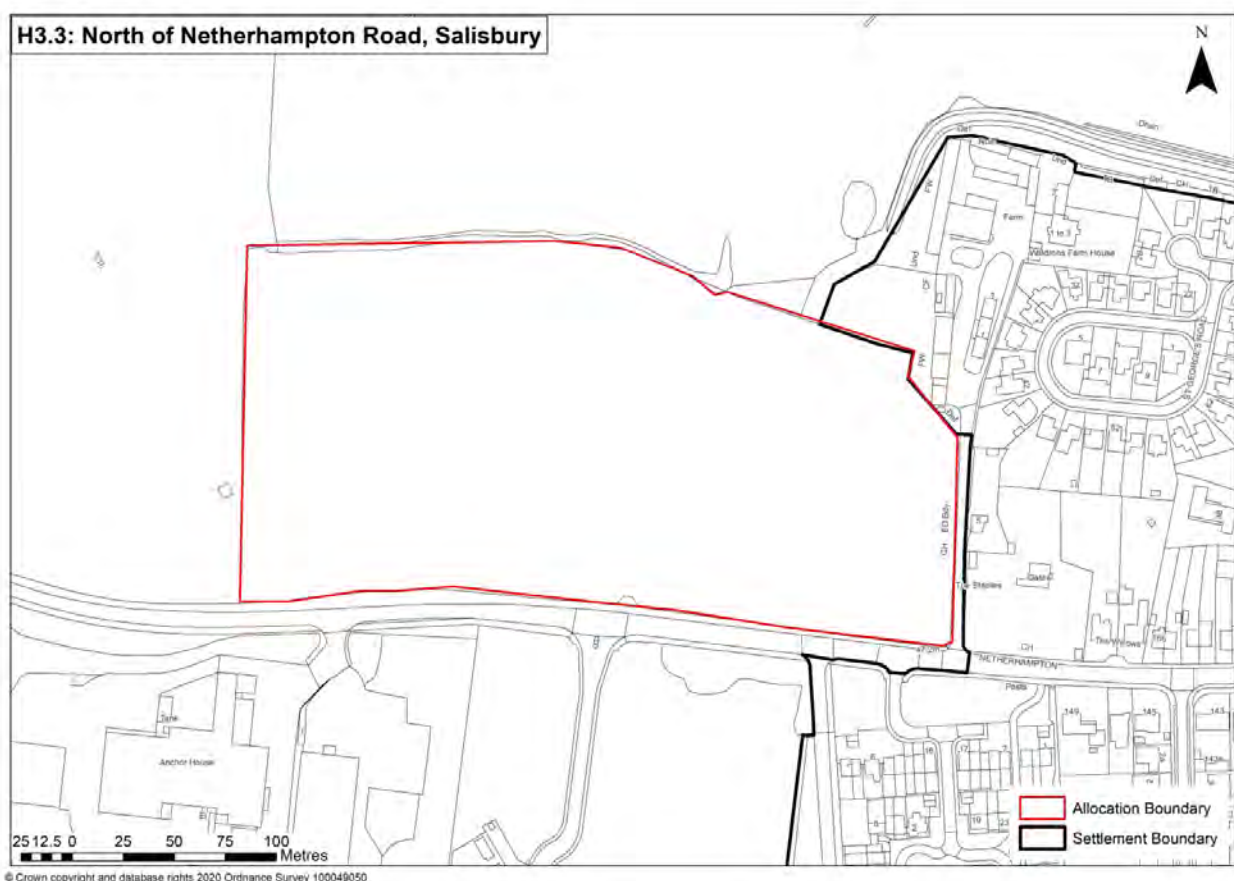
- identification and establishment of a suitable receptor site for the translocation of slow worms in the adjacent Country Park, to be agreed with the Council's ecologist. Development shall not take place until the receptor site has been agreed and translocation has taken place to the satisfaction of the Council's ecologist; and
- appropriate location of new dwellings and high-quality design including landscaping and open space, to mitigate impacts on skyline views.

Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.

- 5.116** Hilltop Way is allocated for the development of approximately 10 dwellings on approximately 0.48ha of land as shown on the Policies Map. The site is adjacent to the existing settlement boundary of Salisbury and would deliver a relatively small number of dwellings towards the overall remaining indicative housing requirement for Salisbury.
- 5.117** The site is a narrow area of undeveloped rough grassland adjacent to existing residential development along Hilltop Way. Access to the site would be achieved via Hilltop Way. There is a public right of way forming the northern boundary of the site and beyond that is the Hampton Country Park. The right of way should be maintained and its route enhanced through additional hedge and tree planting and additional access points to the Country Park.
- 5.118** The site has been shown to have a high population of reptiles (slow worms) and these will need to be re-colonised on a suitable receptor site within the Country Park, prior to development taking place.
- 5.119** There is potential for impacts on skyline views from Old Sarum Airfield Conservation Area and from Old Sarum Castle and these will need to be mitigated through the appropriate location of new dwellings and a high quality design scheme, together with suitable landscaping and provision of open space.

H3.3 North of Netherhampton Road, Salisbury

Figure 5.15 H3.3 North of Netherhampton Road, Salisbury



Policy H3.3

Land North of Netherhampton Road, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 100 dwellings;
- vehicular access to the site from A3094 Netherhampton Road; and
- improvements to cycling and walking routes through the site to link into the existing network.

Development will be subject to the following requirements:

- sensitive high-quality design and layout which ensures the significance of heritage assets and their settings are not subject to unacceptable harm, in particular the setting of Salisbury Cathedral spire. This will be achieved through:

- the use of appropriate heritage and archaeological assessments to guide development;
- a comprehensive approach to landscaping, green infrastructure and open space, including provision of an open corridor through the site to retain important views;
- sensitive treatment of site boundaries. Development will be expected to take particular care to ensure a suitable boundary and transition between the open countryside and the City;
- development which respects the scale, massing and built form of the local area and the setting of the Cathedral;
- development along Netherhampton Road being set back, but providing an active frontage; and
- sensitive use of lighting and signage with regard to infrastructure and highway elements throughout the development.

- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design of the site so that surface water is controlled and does not exacerbate flooding off site;
- no adverse impacts on the water quality of the River Avon SAC from surface water runoff during the construction and operational phases;
- measures to protect the integrity of the River Avon SAC, with particular regard to phosphate discharge into the River Avon and its tributaries. This will be informed by appropriate survey and impact assessment;
- sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments; and
- provision made for transport network improvements necessary to accommodate the scale of development envisaged, as identified through a comprehensive transport assessment.

Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.

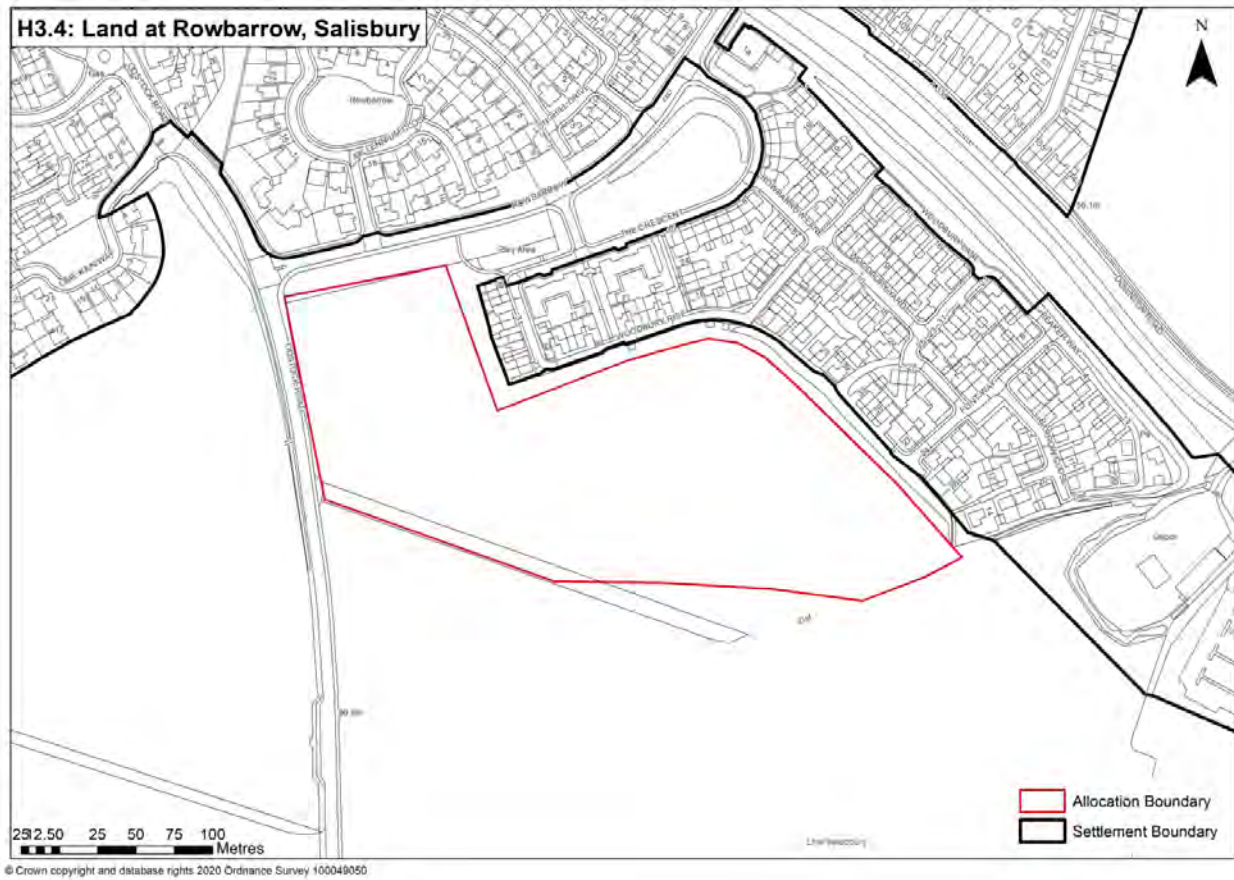
- 5.120** Land North of Netherhampton Road is allocated for the development of approximately 100 dwellings on 5.6ha of land as shown on the Policies Map. It is reasonably well located with

regard to services and facilities. The site is relatively well contained in terms of visual impacts on the wider landscape. The site is wholly located within Flood Zone 1, although its northern boundary is also the boundary to the adjacent area of land that lies within Flood Zone 2. Due to its size, development proposals will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy to address issues of surface water flooding and to ensure that, given the site's proximity to the River Avon and to Flood Zone 2, there are no adverse impacts on the water quality of the River Avon SAC from surface water runoff during the construction and operational phases.

- 5.121** Long views to the historic City of Salisbury and Salisbury Conservation Area including the spire of Salisbury Cathedral (Grade I listed) are available across the site from the A3094, and at closer range from within the site itself. At the planning application stage, the layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting. Development proposals would need to be sensitively designed to ensure that views of the Spire are not significantly compromised. Design and layout would also need to positively address the objectives of the City of Salisbury Conservation Area Appraisal and Management Plan to minimise harm. Proposals would therefore need to provide for high quality, sustainable development that enhances an important approach to the City, and provides links to nearby rights of way. To achieve these outcomes, development proposals will meet the development principles set out in policy. In addition, the design and layout of a scheme should positively respect the significance of heritage assets. This could be achieved through several measures including, for example:
- 5.122**
- the sensitive use of highway surfacing, materials, signage and lighting;
 - the use of focal buildings and appropriate features to define the transition from open countryside to urban form; and
 - a strategy for open space that could provide a heritage trail to link with existing footpaths in the area.
- 5.123** The site has been subject to archaeological assessment, geophysical survey and evaluation trenching, with archaeological interest shown to be present across the site. The archaeological potential of the site is demonstrably high. Development proposals will need to provide for a sensitive design and layout, that ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments.
- 5.124** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. A new primary school on land south of Netherhampton Road would contribute to the new school places needed to serve the area. Funding contributions may also be sought where needed to increase capacity at local GP surgeries in the city, in accordance with core policies of the Wiltshire Core Strategy. A transport assessment will be required to support any planning application and provision made for transport network improvements necessary to accommodate the scale of development.

H3.4 Land at Rowbarrow, Salisbury

Figure 5.16 H3.4 Land at Rowbarrow, Salisbury



Policy H3.4

Land at Rowbarrow, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 100 dwellings;
- vehicular access from the Odstock Road to the west; and
- improvements to cycling and walking routes through the site to link into the existing network.

Development will be subject to the following requirements:

- sensitive design and layout, which ensures the significance of heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;
- a strong landscape framework that maintains and enhances the existing woodland belts, including open space provision in the southern part of the site and a green corridor extending along the southern boundary of the site from the existing beech tree shelterbelt;
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform site layout and design of the site so that surface water is controlled and does not exacerbate flooding off site; and
- provision made for transport network improvements necessary to accommodate the scale of development envisaged, as identified through a comprehensive transport assessment.

Development will take place in accordance with a masterplan approved by the Council as part of the planning application process. The design and layout will take account of all policy requirements, including the timely and coordinated provision of necessary infrastructure to achieve a comprehensive development of the site.

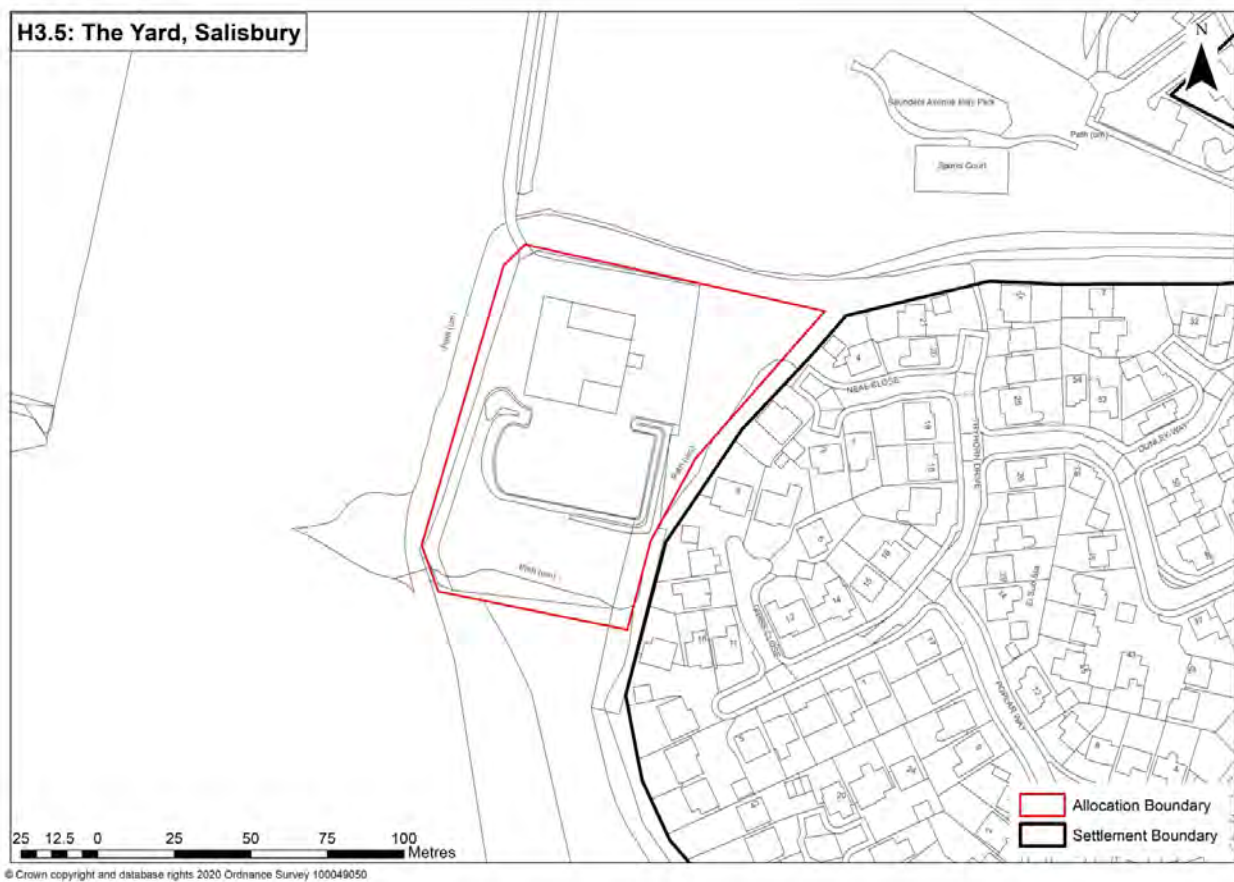
- 5.125** Land at Rowbarrow is allocated for the development of approximately 100 dwellings on 5.56ha of land as shown on the Policies Map. The development of the site would provide housing in a location with a reasonable level of access to the local services and facilities in Salisbury city centre but not within walking distance. There is however a frequent bus service within 100m of the site and the Park & Ride is in close proximity.
- 5.126** Development will need to preserve the contribution made by the site to the setting and therefore to the importance of the Woodbury Ancient Villages Scheduled Monument. If necessary land will need to be set aside from development. In line with national policy, detailed design and layout will be guided by an assessment of heritage assets and their significance (including the contribution made by their setting). Scheduled monument consent will be required. The site also has high archaeological potential.
- 5.127** This is a sloping and quite prominent site. In combination with Heritage Impact Assessment, development will need to take place within a strong landscape framework that maintains and enhances the existing woodland belts affecting the site. Containment provided by the beech shelterbelt on the southern boundary should extend as a green corridor from the end of the shelterbelt eastwards towards the existing Rowbarrow housing development and woodland around the Milk & More Salisbury Depot. This green corridor should include copses, groups of trees and individual specimen trees. The arrangement of any proposed development

and open space on the site should provide a setting for rights of way in the area and maintain their views of the Salisbury Cathedral spire and this could be achieved through careful street alignment and locating open space in the southern part of the site. The sloping buffer of land on the northern edge of the site should be enhanced with tree planting and the landscape buffer along Rowbarrow (road) retained.

5.128 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. A new primary school on land south of Netherhampton Road would contribute to the new school places needed to serve the area. Funding contributions may also contribute to improving the existing primary schools at Harnham. Appropriate contributions may also be sought where needed to increase capacity at local GP surgeries in the city, in accordance with core policies of the Wiltshire Core Strategy.

H3.5 The Yard, Hampton Park Salisbury

Figure 5.17 H3.5 The Yard, Salisbury



Policy H3.5

Land at The Yard, Hampton Park, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 14 dwellings; and
- vehicular access via the existing track onto Roman Road, with a new pedestrian and cycle access route provided through to Neal Close.

Development will be subject to the following requirements:

- landscaping strategy and infrastructure to ensure any development appears as a natural extension to Hampton Park. Hedgerows around the site should be maintained and enhanced where possible;
- identification and establishment of a suitable receptor site for the translocation of slow worms in the adjacent Country Park, or other suitable location, to be agreed with the Council's ecologist. Development shall not take place until the receptor site has been agreed and translocation has taken place to the satisfaction of the Council's ecologist;
- a Precautionary Working Method for birds, including barn owl; and
- measures to address contamination as informed by an assessment of the sites condition.

Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.

- 5.129** The Yard, Hampton Park is allocated for the development of approximately 14 dwellings on approximately 1.31ha of land as shown on the Policies Map. The site lies adjacent to the settlement boundary and existing residential development, and would deliver a relatively small number of dwellings to help contribute towards the overall remaining indicative housing requirement for Salisbury.
- 5.130** The site has previously been used for agricultural storage purposes, is fairly flat, and comprises small parcels of rough grassland and a large disused agricultural storage building. Access to the site would be achieved via Neal Close.
- 5.131** This site is within the Special Landscape Area and in a rural fringe setting, adjacent to the Country Park. Access to the Country Park should be provided from this site and a robust landscape strategy and infrastructure is required to allow any development to appear as a natural extension to Hampton Park.
- 5.132** Hedgerows around the site have the potential to be of importance for bat commuting and should be maintained where possible. There is a high population of slow worms to be translocated off site, which may be within the adjacent Country Park or other suitable location. Given the potential scale of the translocation, any receptor site will need to provide suitable habitat conditions for the species. Translocation shall not occur until a suitable receptor site has been secured and a scheme for this work is agreed with the Council ecologist through the planning application process. No development shall take place until the translocation scheme has been implemented in full. Consideration also needs to be given to the site's potential use as a roost site for barn owls through a Precautionary Working Method for birds.

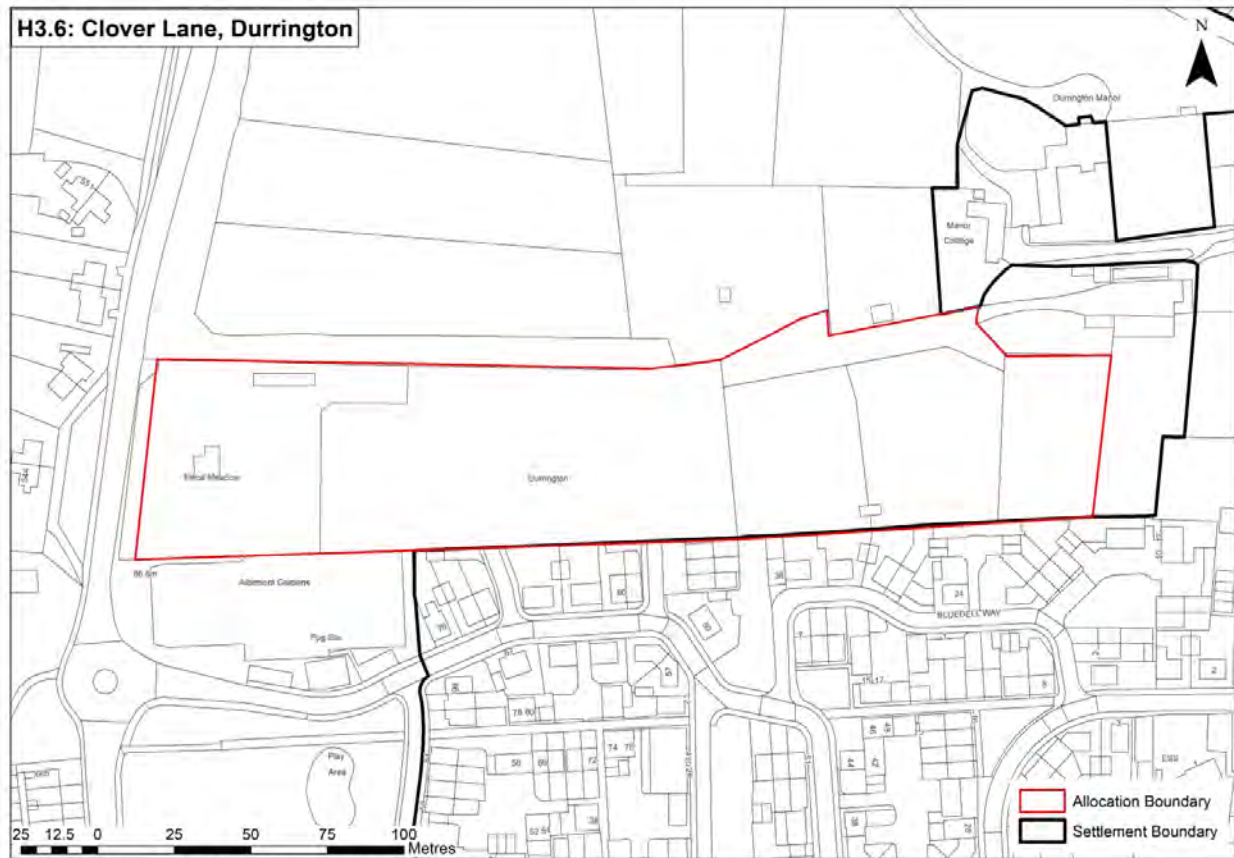
- 5.133** As this site has previously been used for agricultural storage purposes, an assessment of the history and current condition of the site to determine the likelihood of the existence of contamination arising from previous uses should be carried out to inform the planning application.

Amesbury, Bulford and Durrington

- 5.134** The Wiltshire Core Strategy designates Durrington in conjunction with Bulford and Amesbury, as a Market Town. The WCS envisages accommodating approximately 2,440 dwellings over the plan period (2006 to 2026). The settlement strategy identifies a series of priorities including increasing jobs and homes to a moderate and proportionate extent. Development would also help to enhance services and facilities and promote better levels of self-containment, particularly at Durrington and Bulford. Provision of housing at Durrington would positively contribute towards the delivery of this objective by ensuring the viability of existing services and creating demand for an improved local offer. Developers of the allocated sites will be expected to contribute financially towards capacity improvements in local schools and health care provision in accordance with core policies of the Wiltshire Core Strategy.
- 5.135** The area has a high archaeological potential and assessment would be required to support planning applications for each of the sites proposed and this should also include avoiding harm to the outstanding universal value of the Stonehenge and Avebury World Heritage Site.
- 5.136** Upgrades to the local water supply network may be required to accommodate further growth at Durrington, pending a review of local abstraction licences due to be completed in 2019. It is possible that such upgrades may need to be completed before development at the following sites can commence.
- 5.137** Development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss/damage. As such, a Nutrient Management Plan seeks to avoid the likelihood of adverse effects. Nonetheless, impacts are kept under review and this situation may change. For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC. Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in the annex to the Nutrient Management Plan.

H3.6 Clover Lane, Durrington

Figure 5.18 H3.6 Clover Lane, Durrington



Policy H3.6

Land at Clover Lane, Durrington, as identified on the Policies Map, is allocated for development comprising the following elements:

- approximately 45 dwellings;
- vehicular access from Clover Lane;
- improvements to cycling and walking routes through the site to link into the existing network, including to High Street; and
- incorporation of any rights of access to the paddock and stables to the north of the site.

Development will be subject to the following requirements:

- sensitive design and layout, which ensures the significance of designated and non-designated heritage assets and their settings are not subject to unacceptable harm. This shall be informed by appropriate heritage and archaeological assessments;
- retention and enhancement of existing trees and hedgerows within extended green infrastructure corridors as part of wider landscaping to contribute to biodiversity, and provide appropriate screening to adjacent properties; and
- a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to inform design and layout of the site so that surface water is controlled and does not exacerbate flooding off-site.

Proposals for development of the site will be informed by, and take account of, all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.

- 5.138** Approximately 1.9ha of land to the north of Clover Lane, Durrington is allocated for the development of approximately 45 dwellings, as identified on the Policies Map. The central portion of the site has planning permission already and could accommodate approximately 15 dwellings. Land for a further 30 dwellings is allocated for development on two parcels of land to the east and west of this central portion.
- 5.139** Vehicular access would be from the existing residential road network using Clover Lane. Pedestrian and cycle permeability through the site must be incorporated in the layout, including a direct link for pedestrian and cycle access through to the High St. Any access rights from High Street through to the stables and paddock adjacent to the site should be incorporated into the design and layout of the site.
- 5.140** The site lies adjacent to the Durrington Conservation Area and a number of Listed Buildings (Durrington Manor, Grade II listed and The Red House, Grade II listed) and undesignated heritage assets (Manor Cottage and important cobb walls). Detailed design and layout would need to preserve or enhance the character or appearance of the Conservation Area and this is particularly important for the eastern portion of the site. Development should minimise harm to the significance of Listed Buildings and the Conservation Area and should be designed in a sensitive and appropriate manner taking into consideration non-designated heritage assets, designated assets and objectives set out in the Durrington Conservation Area Appraisal. The cobb wall at the eastern boundary of the site will need careful

Policy H3.7

Land at Larkhill Road, Durrington, as identified on the Policies Map, is allocated for residential development comprising the following elements:

- approximately 15 dwellings.

Development will be subject to the following requirements:

- sensitive design and layout, which ensures the archaeological potential of the site is addressed through the planning application process. This shall be informed by appropriate archaeological assessment; and
- layout and design in line with character and pattern of frontage development on Larkhill Road, with gardens or open space to the south of the site serving as a soft edge to the countryside.

Proposals for development of the site will be informed by and take account of all policy requirements and opportunities in design and layout and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of necessary infrastructure, services, facilities and open space.

- 5.142** Approximately 0.8ha of land to the south of Larkhill Road, Durrington is allocated for the development of approximately 15 dwellings, as illustrated on the Policies Map. The land forms the northern part of a field which slopes down towards the River Avon at the southern edge of Durrington. As the site lies within Groundwater Protection Zone 1, development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy.
- 5.143** The form of development should replicate the character and pattern of frontage development characteristic of Larkhill Road. Development as a result will be limited, and of a relatively low density. In order to soften the edge to the open countryside, the southern edge of the site should consist of gardens or open space with boundaries that are relatively open.
- 5.144** Due to the location in close proximity to the World Heritage Site, including Durrington Walls and Woodhenge, archaeological assessment will be required and must inform development proposals and any necessary mitigation.

6. Settlement boundary review

Introduction

- 6.1** The Council did not review the extent of the boundaries to inform the WCS and instead relied upon the former district local plans. They have been reviewed in line with the Plan Objective:
- To ensure there is a clear definition to the extent of the built up areas at Principal Settlements, Market Towns, Local Service Centres and Large Villages
- 6.2** The Plan applies one consistent methodology for the County to replace the slightly different ways used by the previous District Councils. The Council has developed this methodology in consultation with Parish and Town Councils. The process is explained in detail in Topic Paper 1: Settlement Boundary Review Methodology.
- 6.3** A comprehensive review of the boundaries ensures they are up-to-date and adequately reflect changes that have happened since they were first established. The Plan amends settlement boundaries where necessary⁽¹⁶⁾.
- 6.4** It is also the prerogative of local communities to review Settlement Boundaries through neighbourhood planning. Neighbourhood Plans are required to be in general conformity with the WCS. Paragraphs 4.13 and 4.15 of the WCS support the review of settlement boundaries through the Plan or through neighbourhood plans. Therefore, where a neighbourhood plan has been considered to have reviewed the settlement boundary and is at a sufficiently advanced stage⁽¹⁷⁾, then it is unnecessary to duplicate this work by reviewing the relevant settlement boundary in the Plan.
- 6.5** Neighbourhood plans are considered to have reviewed their settlement boundaries where the issue has been explicitly addressed through the neighbourhood plan process, even if the eventual outcome is to retain the existing settlement boundary.
- 6.6** Neighbourhood plans submitted subsequently will still be able to consider their own settlement boundary through the neighbourhood planning process. Once a future neighbourhood plan is 'made', its settlement boundaries will then supersede those in the Plan.

16 Settlement boundaries have been updated to take account of implemented planning permissions up to April 2017

17 A neighbourhood plan is considered to be at an advanced stage once it has been submitted (Regulation 15 / 16 according to the Neighbourhood Plan (General) Regulations 2012 (as amended))

7. Implementation and monitoring

- 7.1** The Plan is designed to be flexible and contain appropriate levels of contingency, so that it can effectively respond to events if necessary. However, it will be essential to monitor the effectiveness of the strategy, so that action can be taken to address any issues which may arise. This monitoring will be done through the following mechanisms
- 7.2** Central to monitoring the effectiveness of the plan will be the use of Housing Trajectories. One of the two purposes of the plan is to maintain a five year land supply in each of Wiltshire's Housing Market Area (HMA). Therefore monitoring the delivery of houses is critical. Basically a housing trajectory is a graph which plots the expected rate of housing delivery over a plan period and then may be used to overlay actual delivery so that the success of the policies can be evaluated.
- 7.3** As advised in Planning Policy Guidance, housing trajectories are an important tool for monitoring housing delivery. In line with this guidance, Wiltshire Council will carry out an annual assessment in a robust and timely fashion, based on up-to-date and sound evidence, taking into account the anticipated trajectory of housing delivery, and consideration of associated risks, and an assessment of the local delivery record. The assessment will be realistic and made publicly available in an accessible format.
- 7.4** By taking a thorough approach on an annual basis, the Council will be in a strong position to demonstrate a robust five year supply of sites. Demonstration of a five year supply is a key material consideration when determining housing applications and appeals. As set out in the NPPF⁽¹⁸⁾, a five year supply is also central to demonstrating that relevant policies for the supply of housing are up-to-date in applying the presumption in favour of sustainable development.
- 7.5** There are four main components of the monitoring framework.

Wiltshire Monitoring Framework

- 7.6** The Wiltshire Monitoring Framework⁽¹⁹⁾ was published alongside the WCS, and will also be used to check on the effectiveness of the policies within this document. The Monitoring Framework will be used to ask whether the policy is working, whether it is delivering the homes, which is the underlying objective of the policy, and what the significant effects of this are. It sets out objectives and targets for each policy, and identifies the indicators which will be used to assess progress against these. The Wiltshire Monitoring Framework will ensure that the Core Strategy is steered by a continuous process of 'plan, monitor, manage'.

Annual Monitoring Report

- 7.7** An annual report will be prepared to analyse the impacts of the core policies of the WCS, and assess progress against the targets identified in the Wiltshire Monitoring Framework. This Annual Monitoring Report (AMR) will include monitoring of the proposals in the Plan and also information relating to the Infrastructure Delivery Plan (IDP) and the Sustainability Appraisal (SA). Actions required to address policy performance against the Plan Objectives will then be reconsidered

18 NPPF, paragraph 11, DCLG (Mar 2012)

19 <http://www.wiltshire.gov.uk/wiltshire-local-plan-monitoring-framework-feb-2012.pdf>

Housing Land Supply

- 7.8** In line with National Policy / Guidance, the Council monitors the number of new homes built each year, homes currently under construction and those that are expected to be built in the future. This evidence is set out in the 'Housing Land Availability Report'⁽²⁰⁾ and 'Housing Land Supply Statement'⁽²¹⁾ the latter used to present the Council's 5-year housing land supply position. The proposals set out within the Plan (along with the proposals in the adopted Core Strategy and Chippenham Site Allocations Plan) are intrinsically linked to the maintenance of the supply position and hence will need to be monitored to ensure timely delivery. In order to assist the monitoring process, developers / landowners will be asked to provide the Council with detailed site delivery trajectories.
- 7.9** In addition to the monitoring of the Plan's performance, the Council is also obliged to monitor housing delivery from neighbourhood plans and 'windfall' sites in line with the advice set out in the Planning Practice Guidance.
- 7.10** Further, national policy requires Local Planning Authorities to produce plans that meet the tests of soundness, which include that plans are 'positively prepared'⁽²²⁾. This necessitates a proactive approach to identifying and allocating sites to ensure the housing requirements can be met, rather than awaiting anticipated delivery from windfall sites. The Plan proposals ensure that there is no reliance on windfall to provide the minimum housing requirements of each HMA. That is, the Plan does what it was designed to do, which is to maintain surety of supply throughout the plan period prescribed by the WCS (Objective 2).

Management of risk – a risk register

- 7.11** A part of monitoring the effectiveness of the Plan will be to maintain a risk register. It will be used to manage risks by identifying them as they arise, evaluating their severity and identifying measures to treat them through appropriate mitigation measures that are either preventative or contingencies.

20 <http://www.wiltshire.gov.uk/housingland-availability-report-2016-doc.pdf>

21 <http://www.wiltshire.gov.uk/housingland-supply-statement-march--update.pdf>

22 NPPF, paragraph 182, DCLG (Mar 2012)

Appendix A: Amended settlement boundaries

East Wiltshire Housing Market Area

Devizes Community Area

- A.1** The following settlement boundaries in the Devizes Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:
- Devizes (see below)
 - Bromham
 - Market Lavington
 - Rowde, and
 - Worton
- A.2** Devizes has a made Neighbourhood Plan which has reviewed its settlement boundary. The Devizes Neighbourhood Plan had the intention of including its site allocations within its settlement boundary however one allocation was omitted in error. Wiltshire Council has not conducted a wholesale review of the settlement boundary of Devizes however it does include the site omitted from the boundary in error in the Neighbourhood Plan.
- A.3** The settlement boundaries for Potterne, Urchfont and West Lavington and Littleton Panell have not been reviewed because of neighbourhood plans.

Devizes

Page 430

Settlement Boundary (2020)

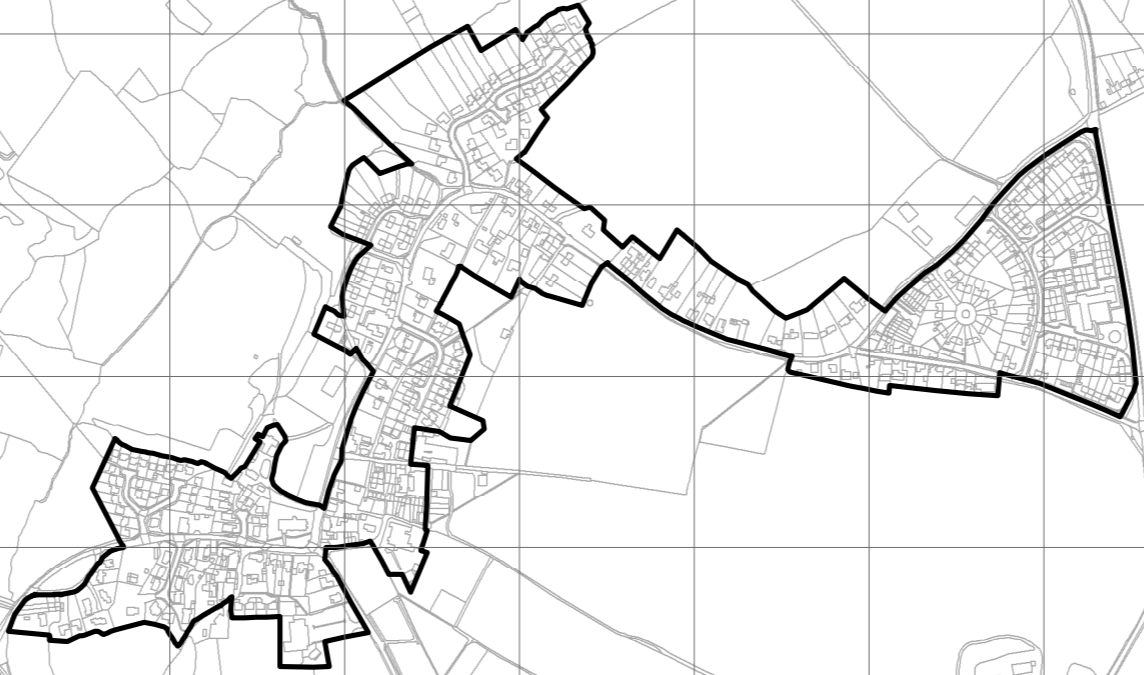
A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Bromham

Page 431



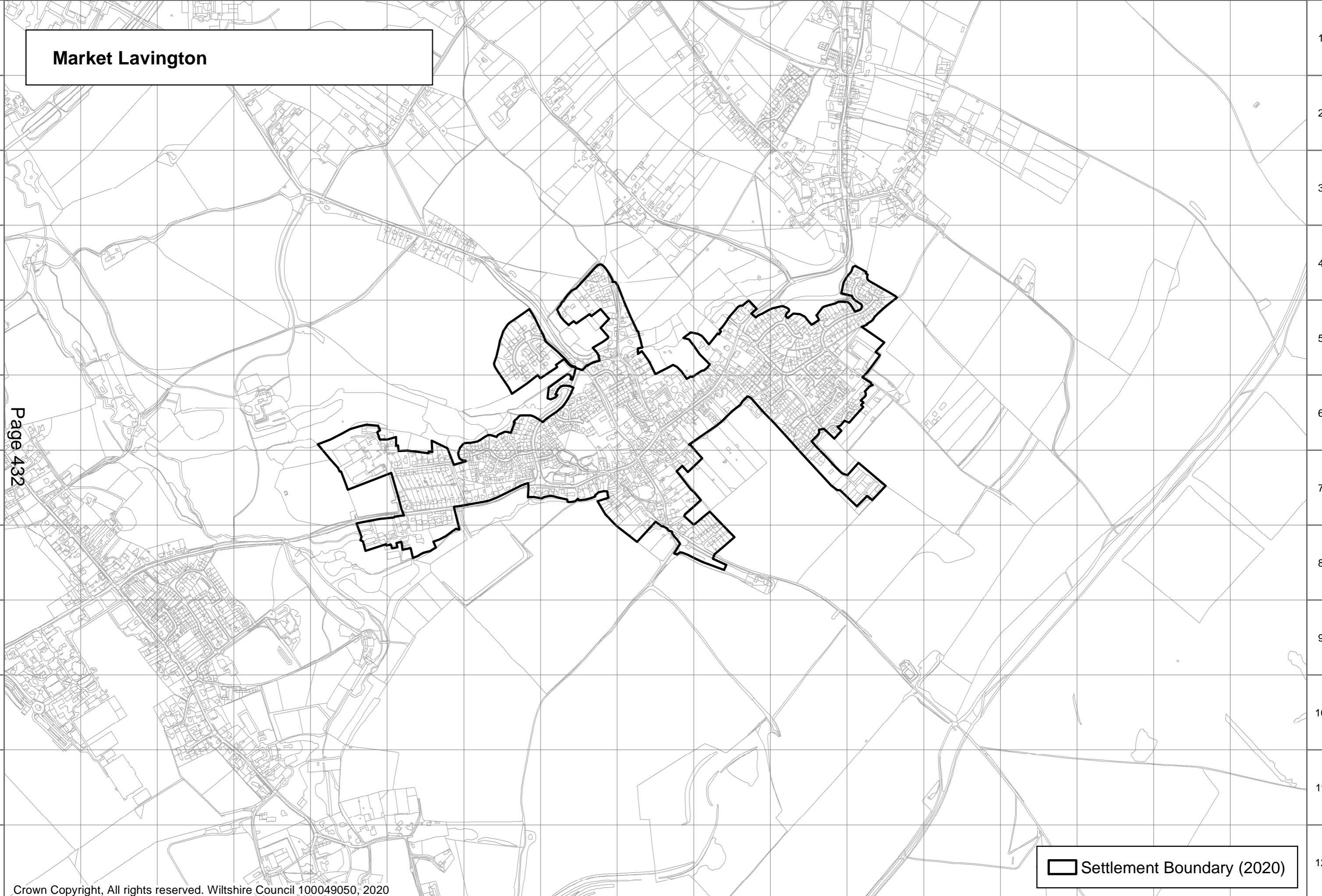
 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q


A B C D E F G H I J K L M N O P Q

1 2 3 4 5 6 7 8 9 10 11 12

Market Lavington



Page 432

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

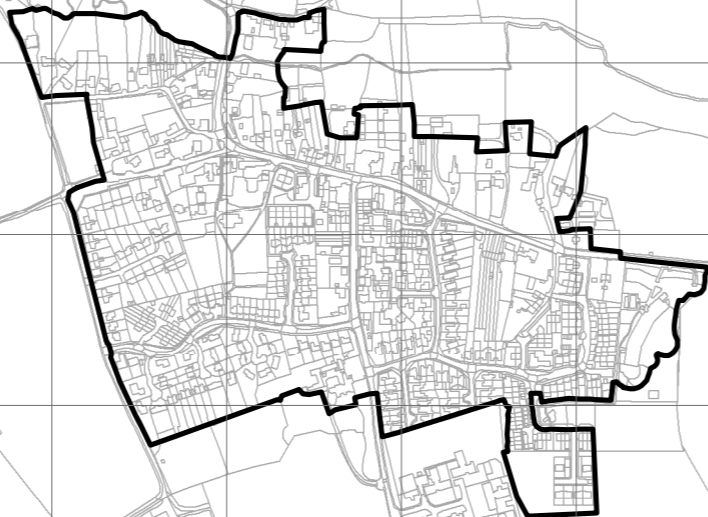
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Rowde

Page 433



 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12


Worton

1
2
3
4
5
6
7
8
9
10
11
12

Page 434

A B C D E F G H I J K L M N O P Q



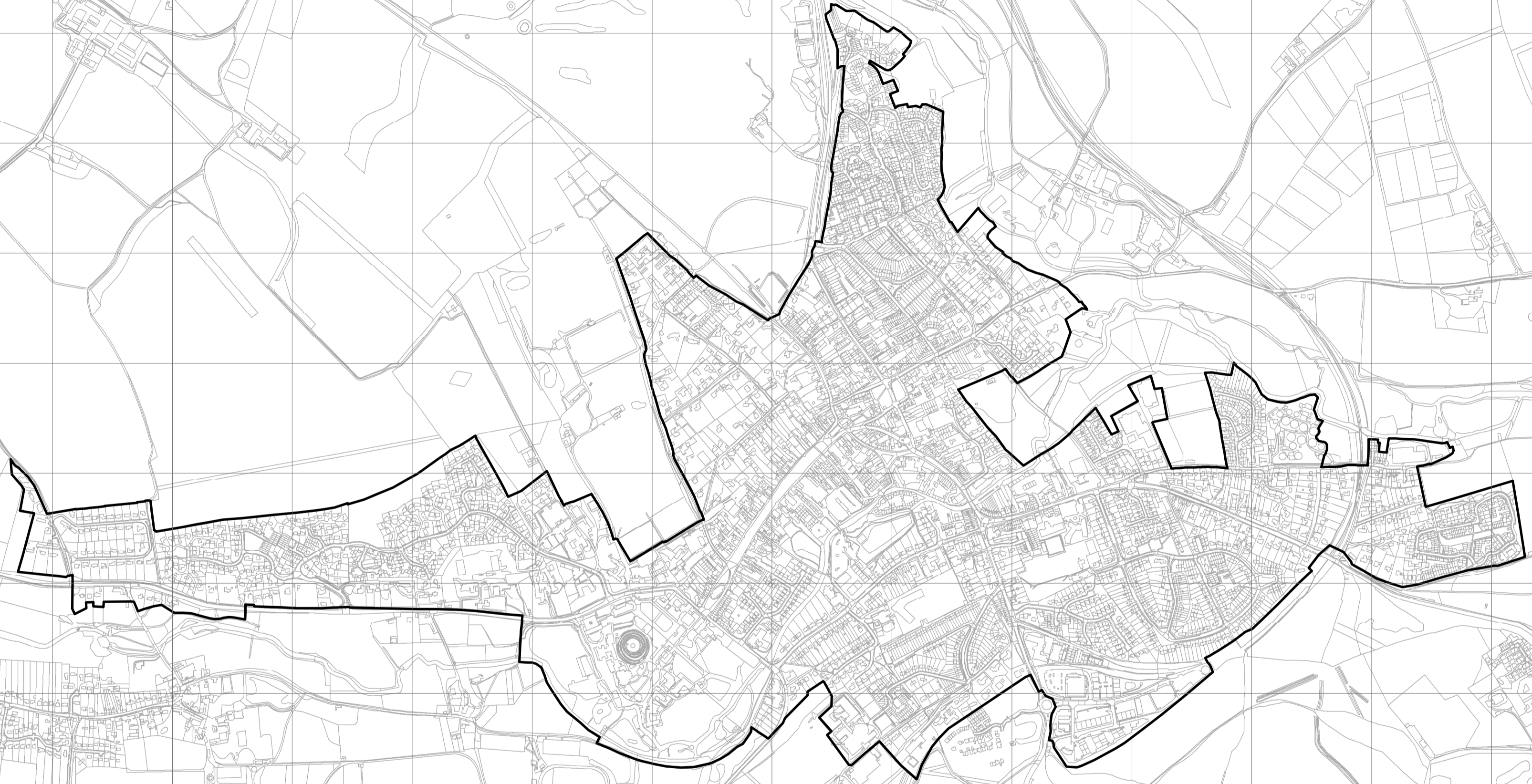
 Settlement Boundary (2020)

Marlborough Community Area

A.9 The following settlement boundaries in the Marlborough Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Marlborough
- Aldbourne
- Baydon
- Broad Hinton, and
- Ramsbury

Marlborough



□ Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

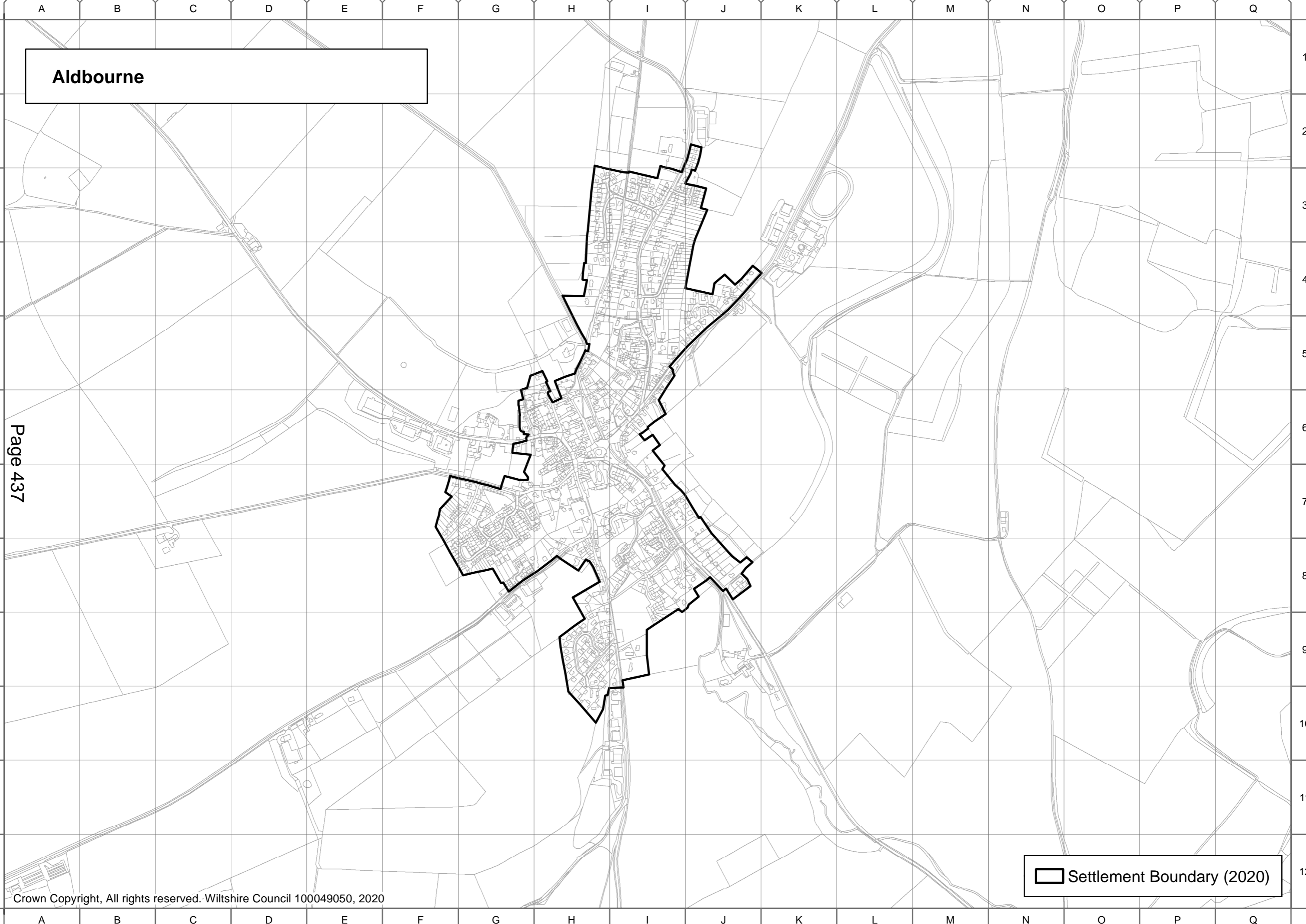
Aldbourn

1
2
3
4
5
6
7
8
9
10
11
12

Page 437

A B C D E F G H I J K L M N O P Q

 Settlement Boundary (2020)



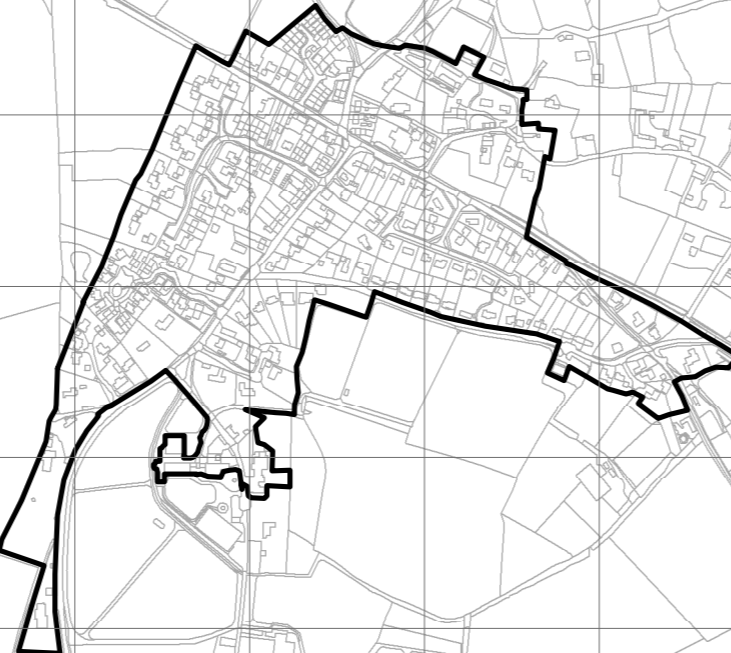
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

Baydon

1
2
3
4
5
6
7
8
9
10
11
12

Page 438



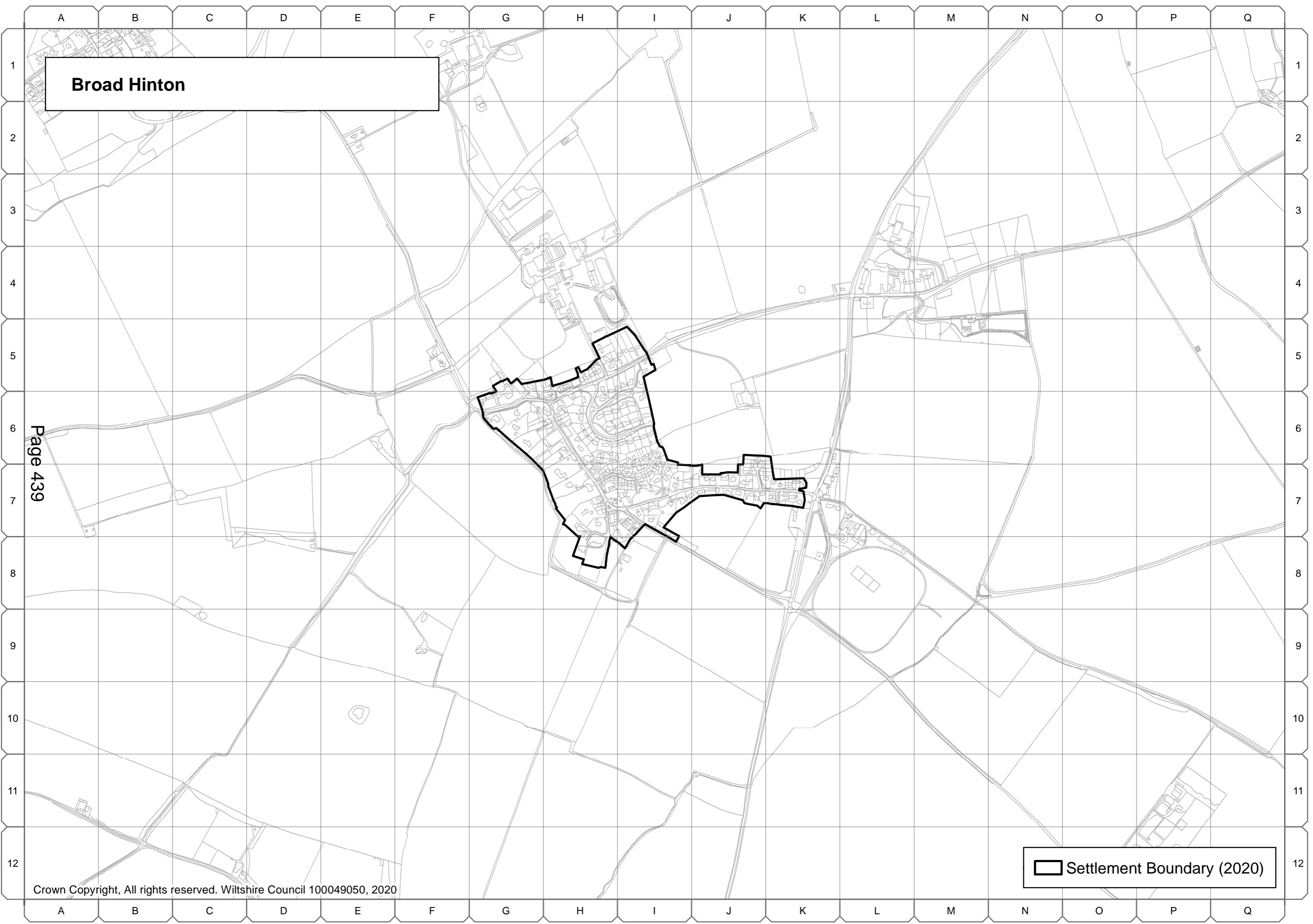
 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

Broad Hinton

Page 439

□ Settlement Boundary (2020)



A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

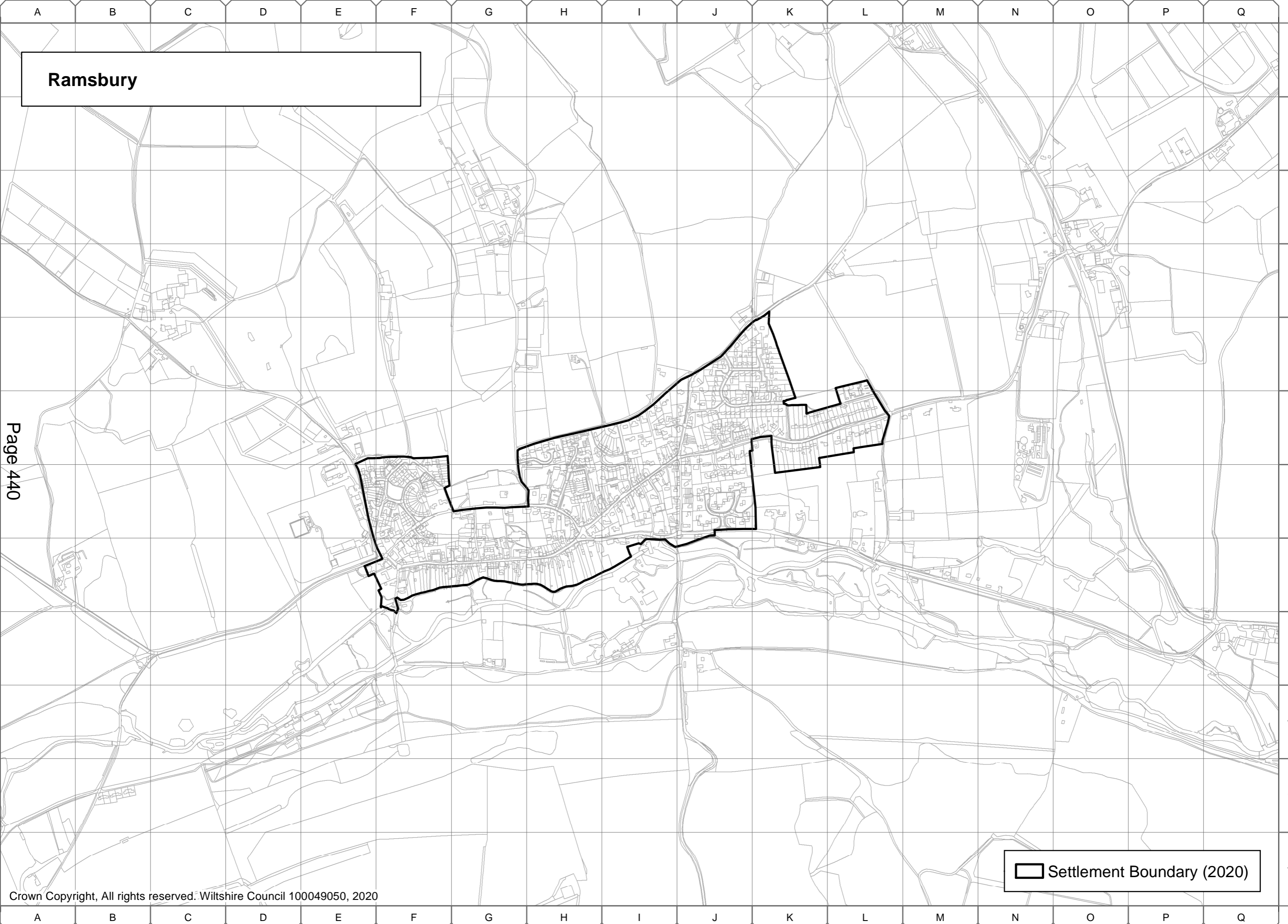
Ramsbury

1
2
3
4
5
6
7
8
9
10
11
12

Page 440

A B C D E F G H I J K L M N O P Q

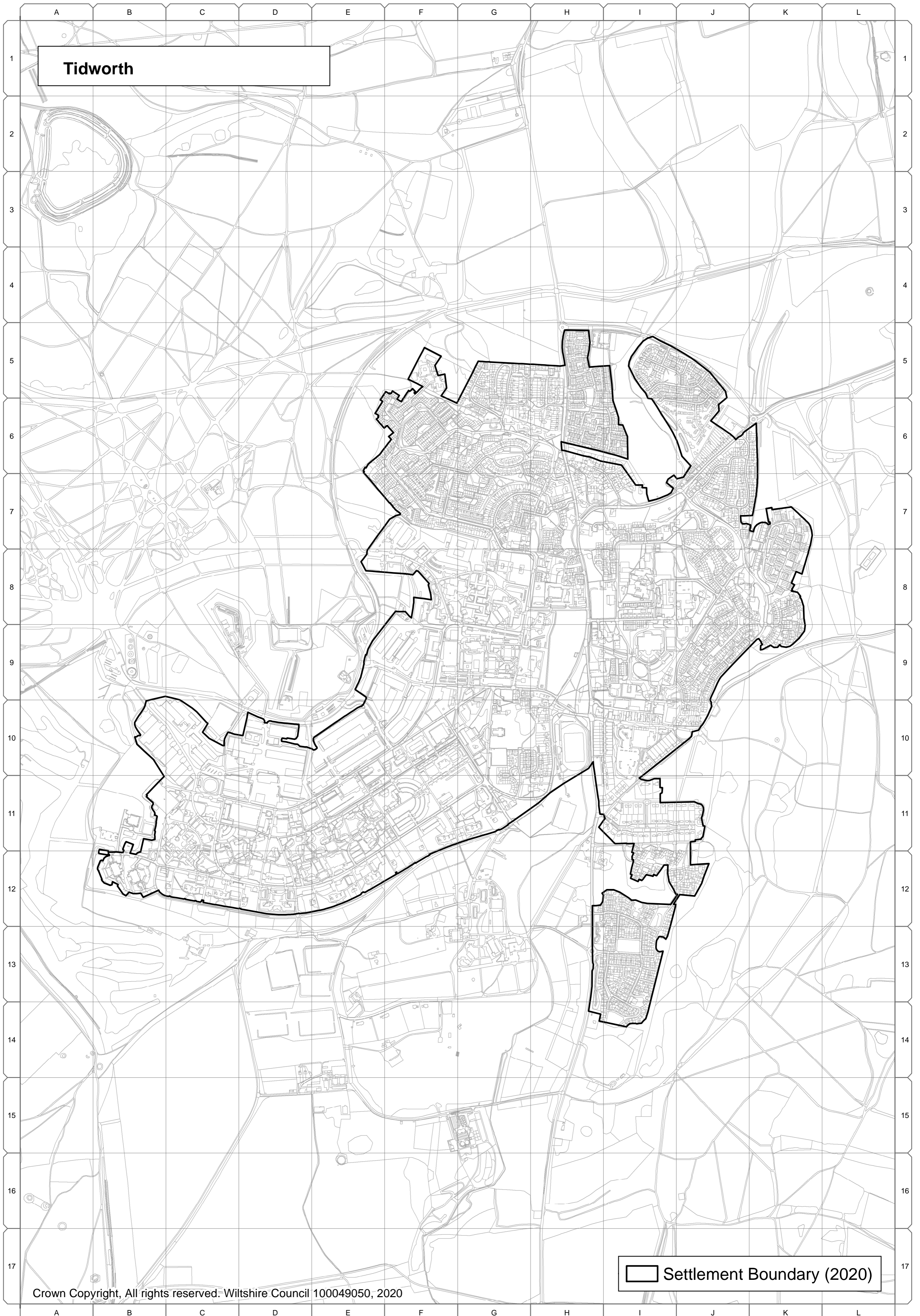
□ Settlement Boundary (2020)



Tidworth Community Area

A.15 The following settlement boundaries in the Tidworth Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Tidworth
- Collingbourne Ducis
- Ludgershall, and
- Netheravon




Tidworth

Settlement Boundary (2020)

Collingbourne Ducis

Page 443

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

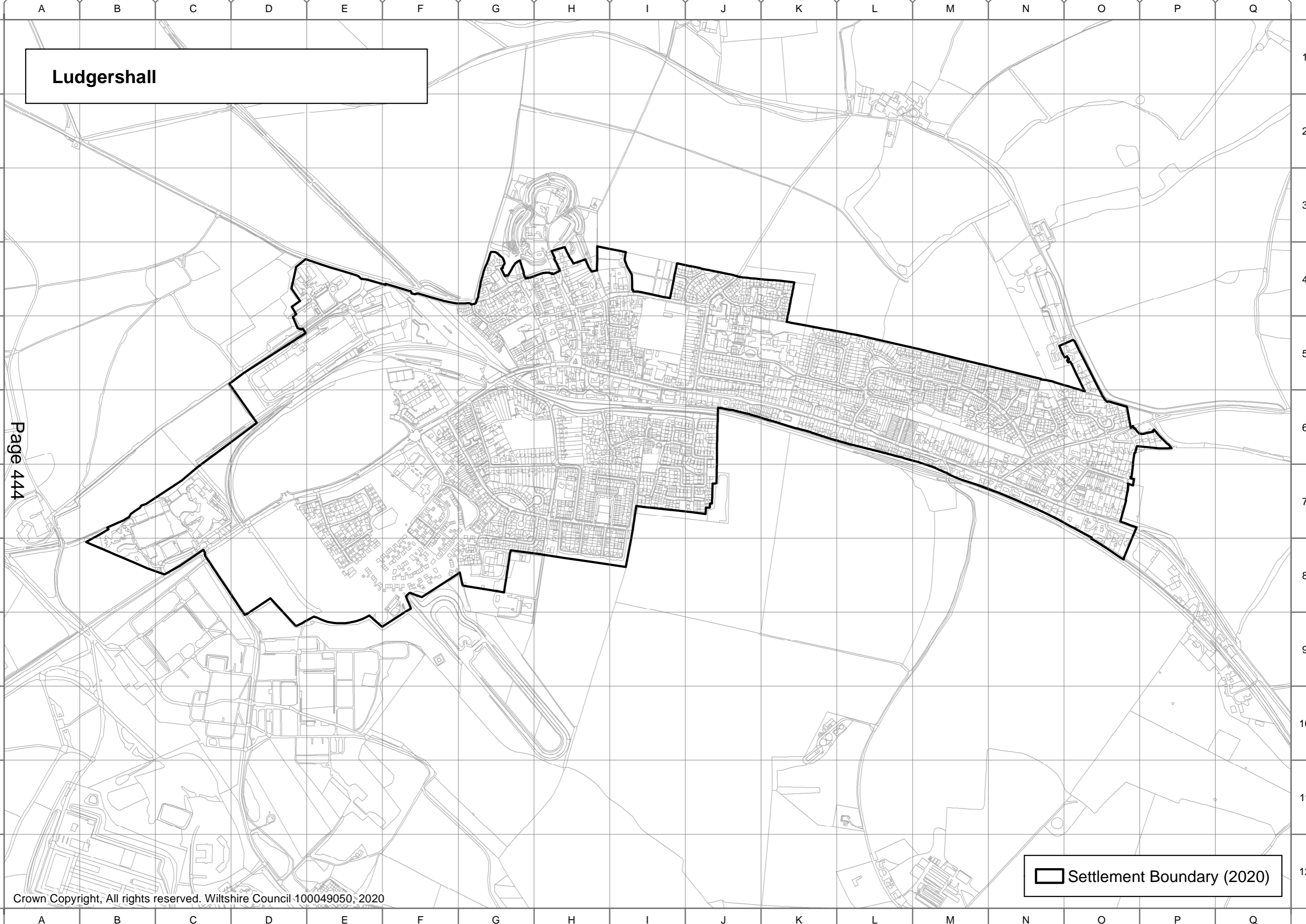
1
2
3
4
5
6
7
8
9
10
11
12

Ludgershall

Page 444

□ Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q




A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

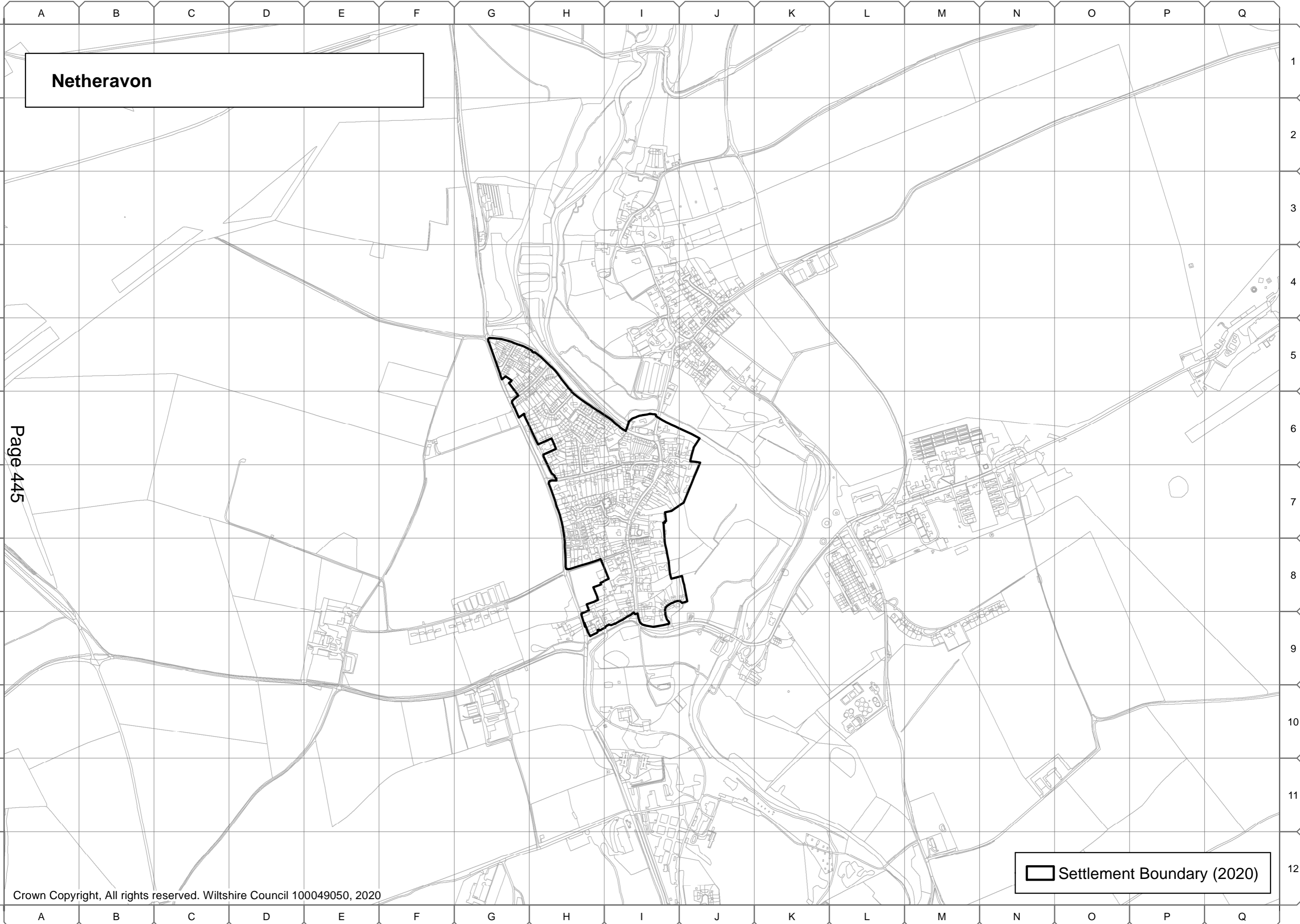
Netheravon

1
2
3
4
5
6
7
8
9
10
11
12

Page 445

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q



Pewsey Community Area

A.20 The following settlement boundaries in the Pewsey Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Burbage
- Great Bedwyn
- Shalbourne, and
- Upavon

A.21 The settlement boundary for Pewsey has not been reviewed because of a neighbourhood plan.


A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

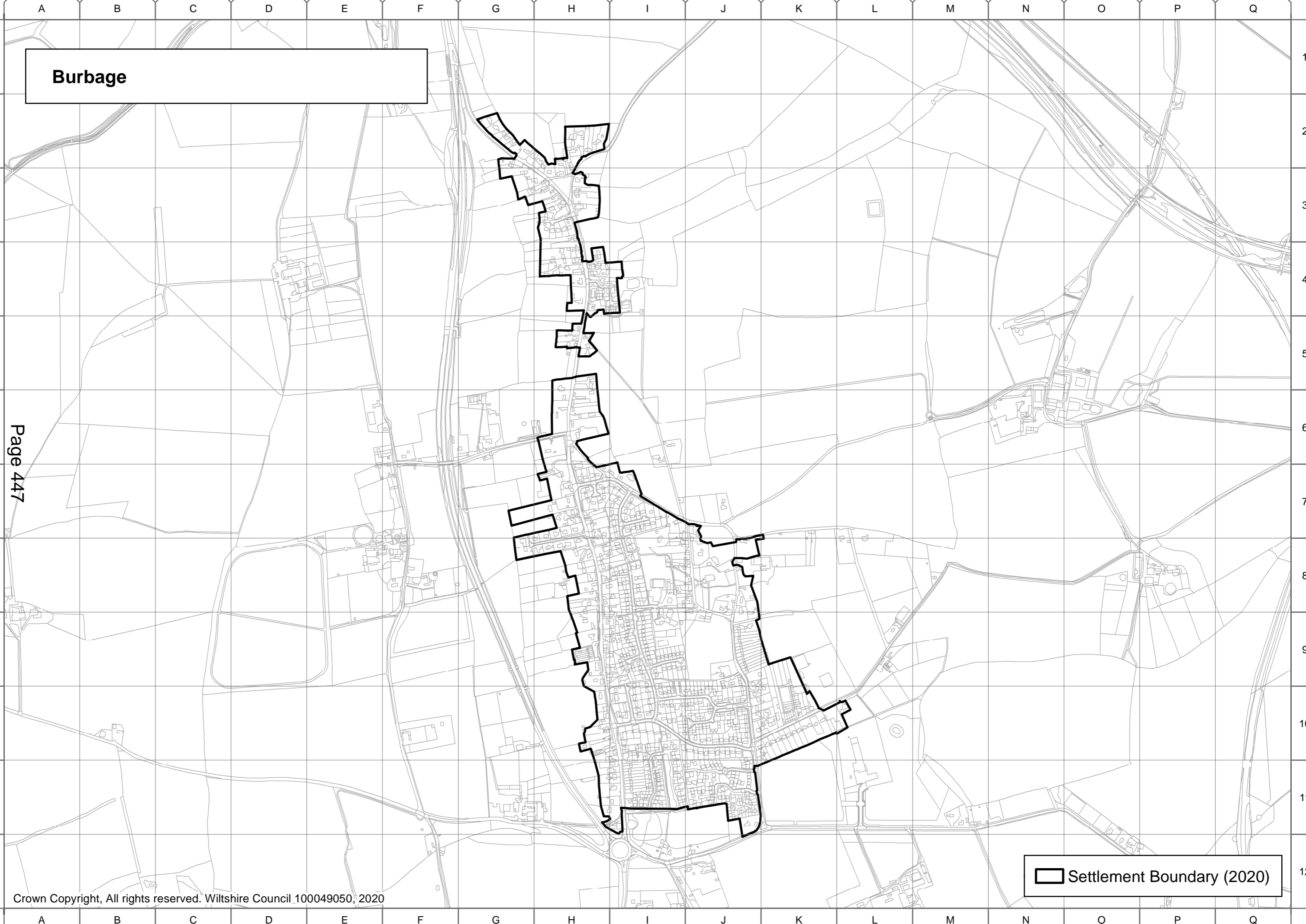
Burbage

1
2
3
4
5
6
7
8
9
10
11
12

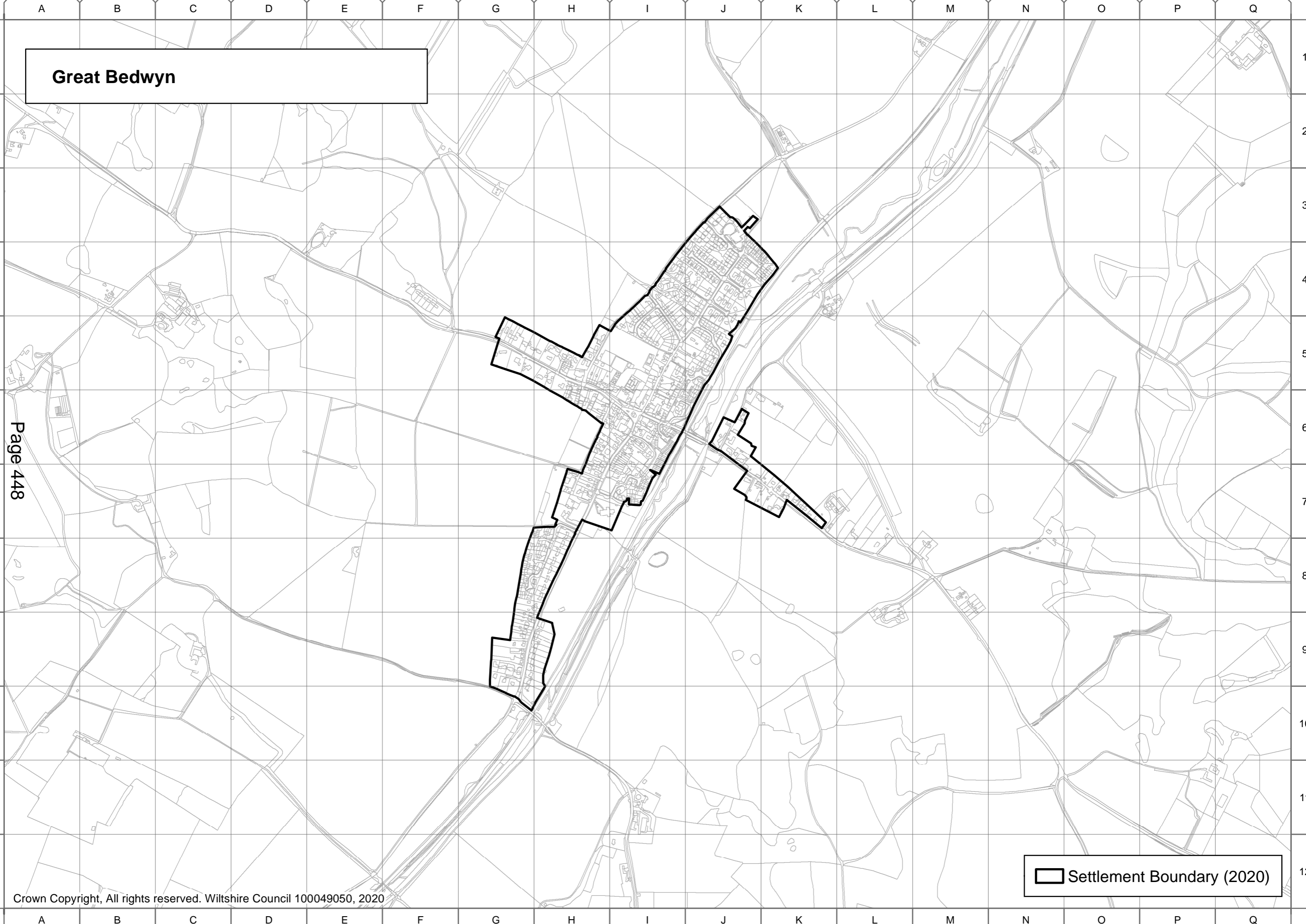
Page 447


 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q



Great Bedwyn



 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

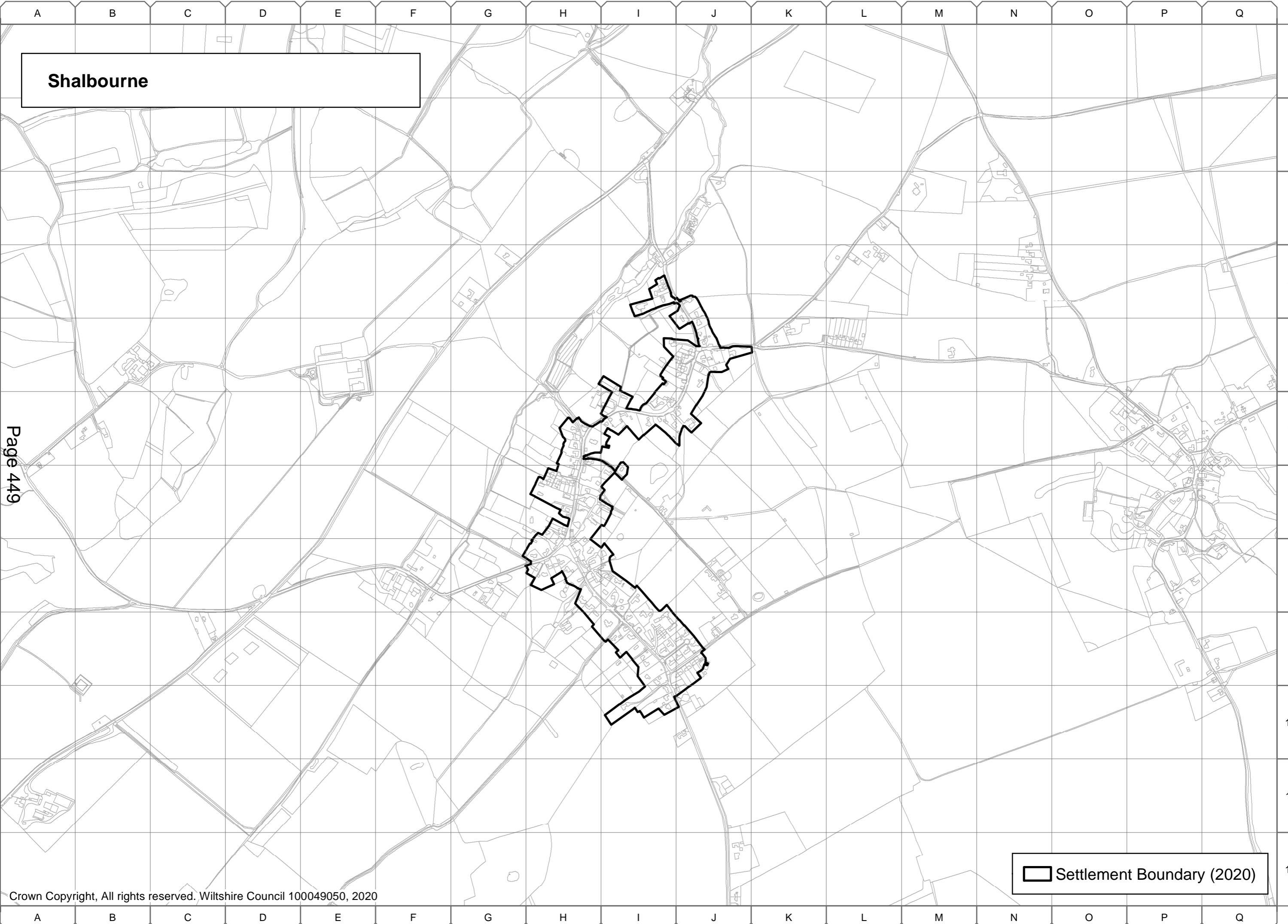
Shalbourne

1
2
3
4
5
6
7
8
9
10
11
12

Page 449

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q




A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

Upavon

Page 450

A B C D E F G H I J K L M N O P Q

 Settlement Boundary (2020)



North and West Wiltshire Housing Market Area

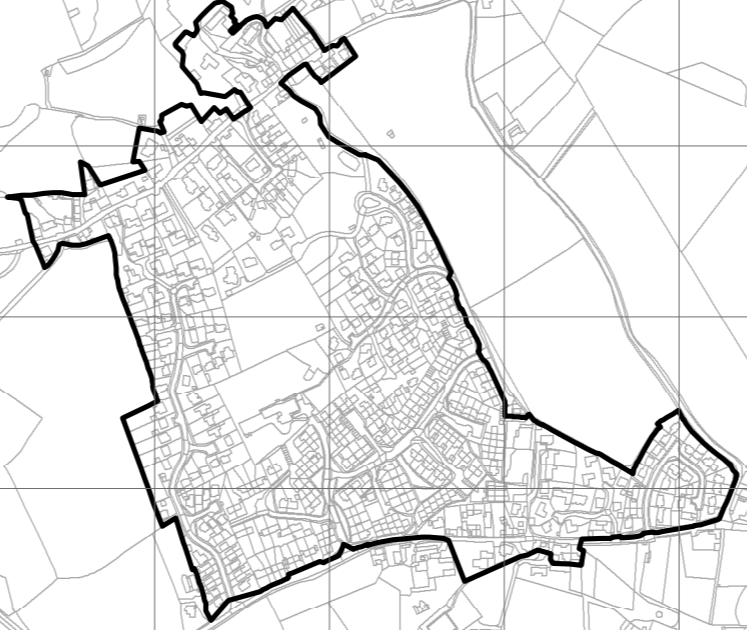
Bradford on Avon Community Area

A.26 The following settlement boundaries in the Bradford on Avon Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Westwood, and
- Winsley

A.27 The settlement boundaries for Bradford on Avon and Holt have not been reviewed because of neighbourhood plans.

Westwood



□ Settlement Boundary (2020)

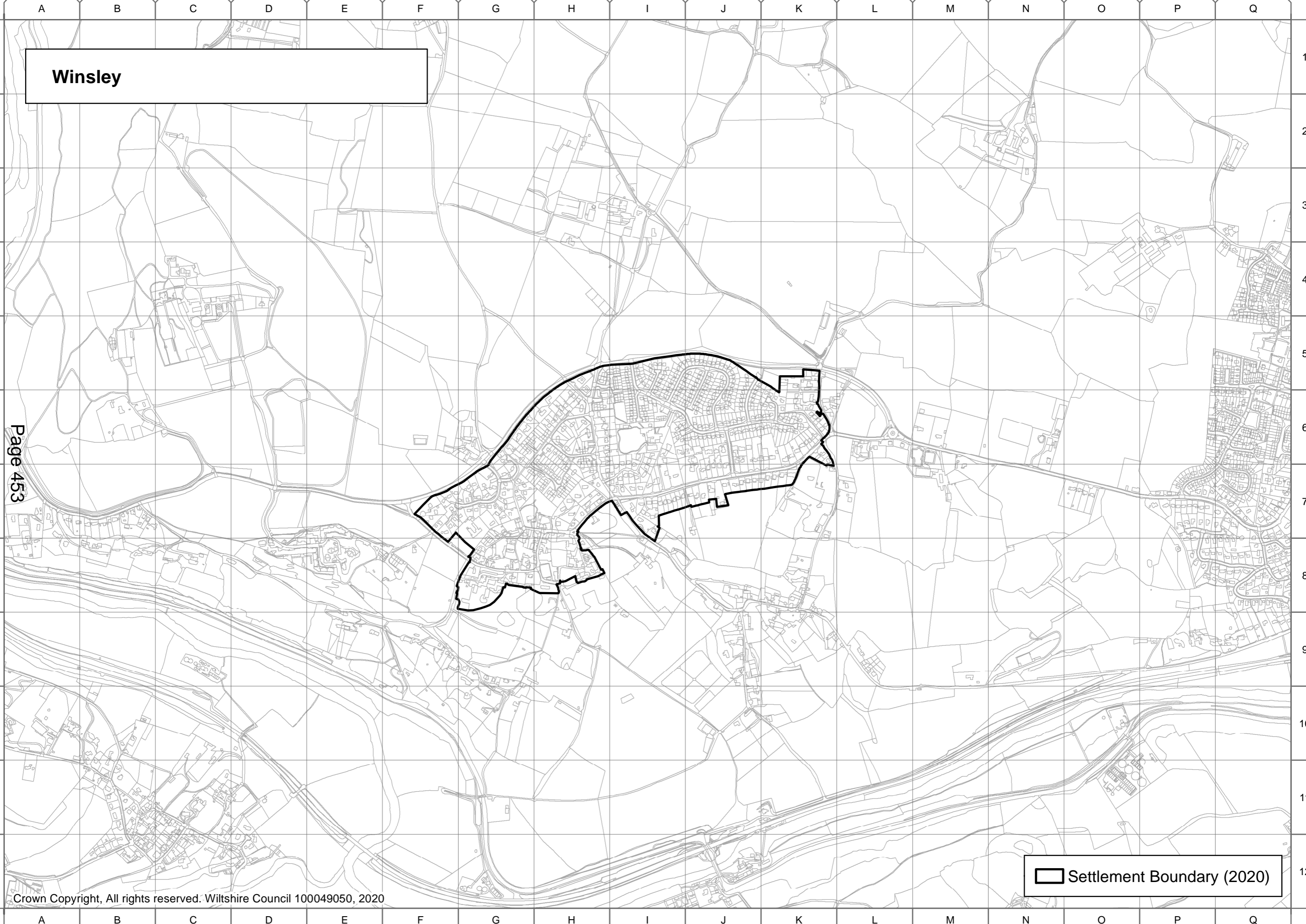
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Winsley

Page 453



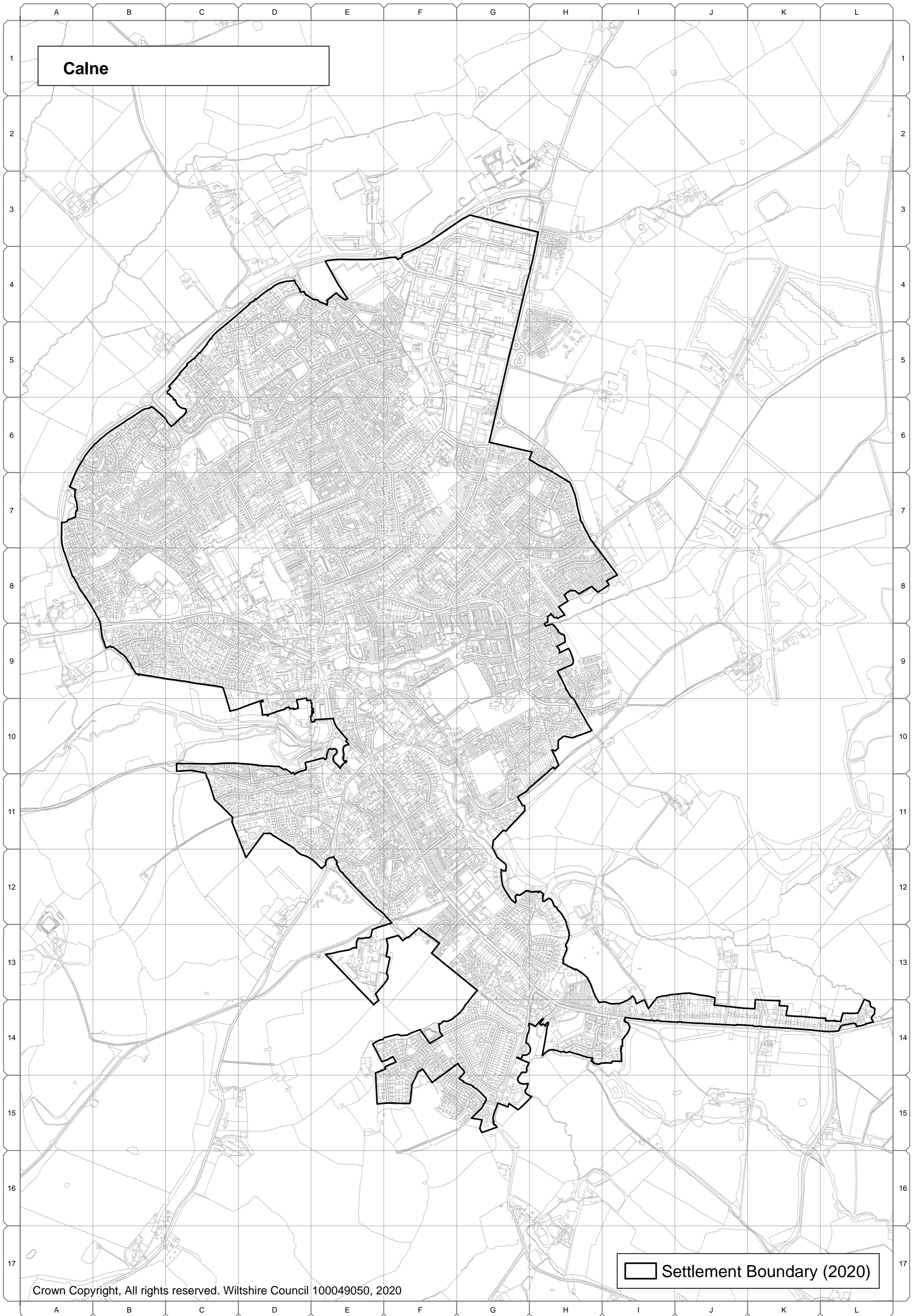
 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q


Calne Community Area

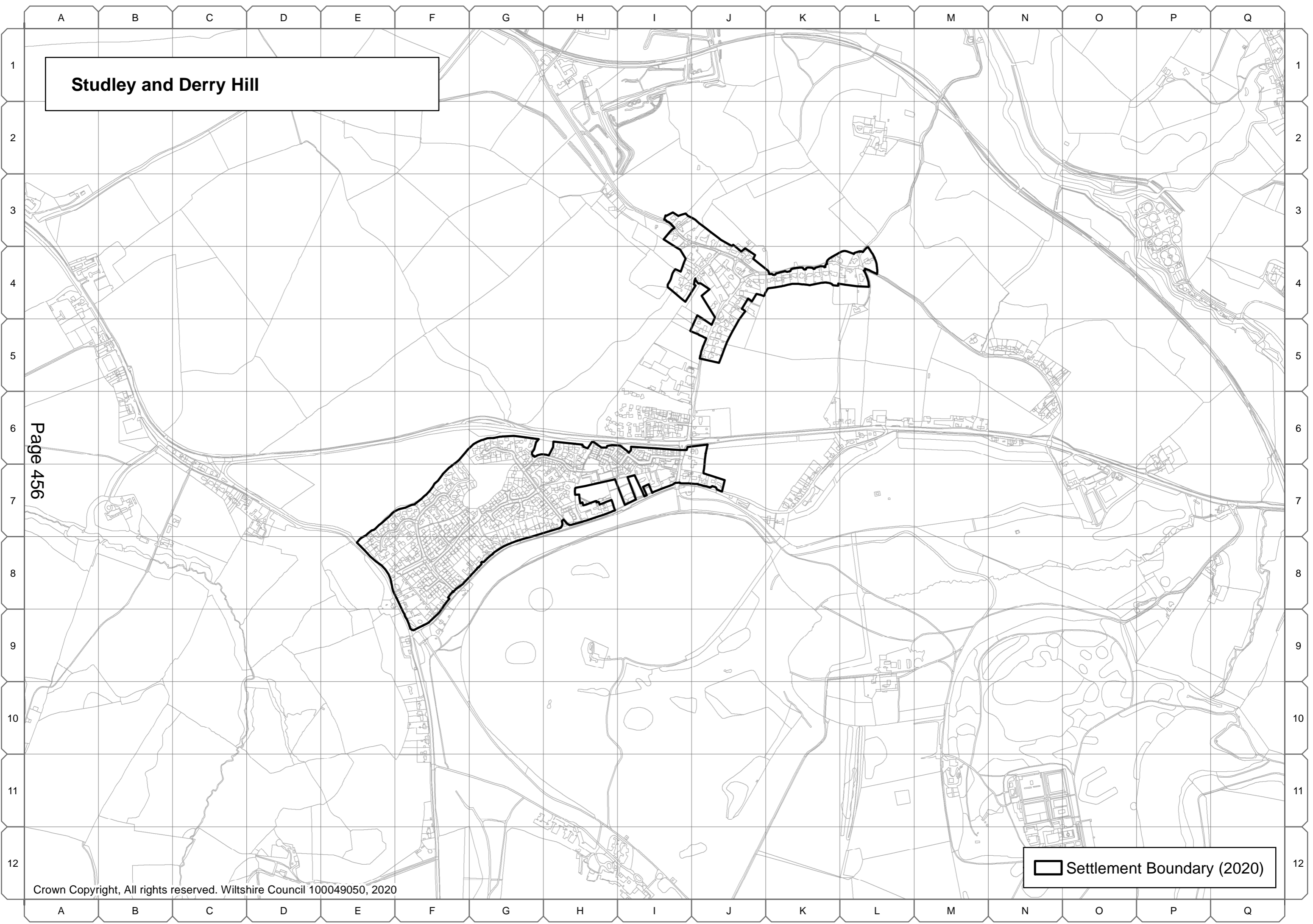
A.30 The following settlement boundaries in the Calne Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Calne, and
- Studley and Derry Hill



Studley and Derry Hill

 Settlement Boundary (2020)



Chippenham Community Area Remainder

A.33 The following settlement boundaries in the Chippenham Community Area Remainder have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Hullavington
Kington St Michael
- Sutton Benger, and
- Yatton Keynell
-

A.34 The settlement boundary for the town of Chippenham has been reviewed by the Chippenham Site Allocations Plan. The settlement boundary for Christian Malford has not been reviewed because of a neighbourhood plan.

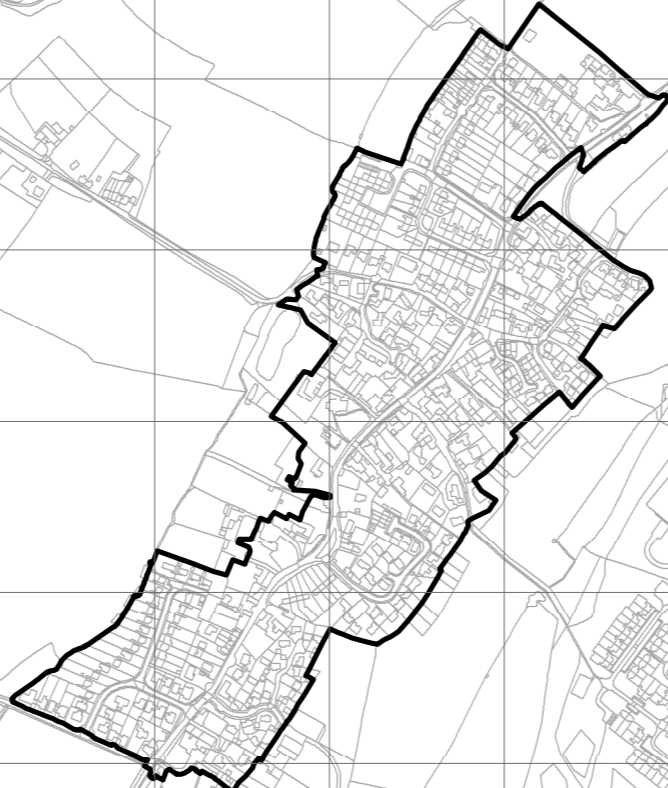
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

Hullavington

1
2
3
4
5
6
7
8
9
10
11
12

Page 458



 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

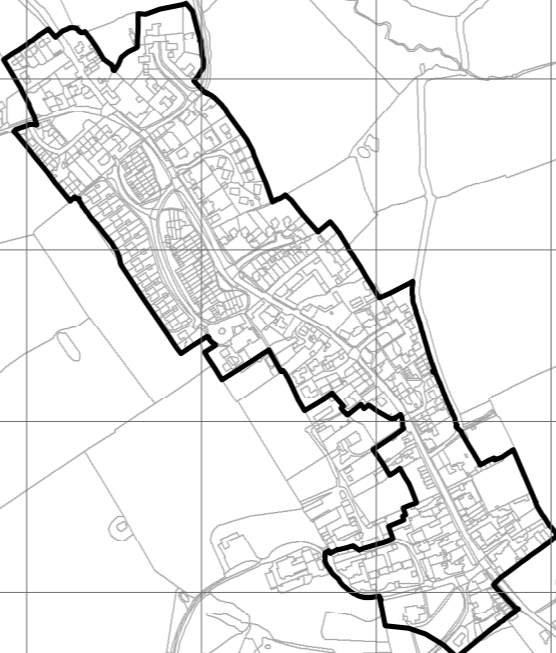
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Kington St Michael

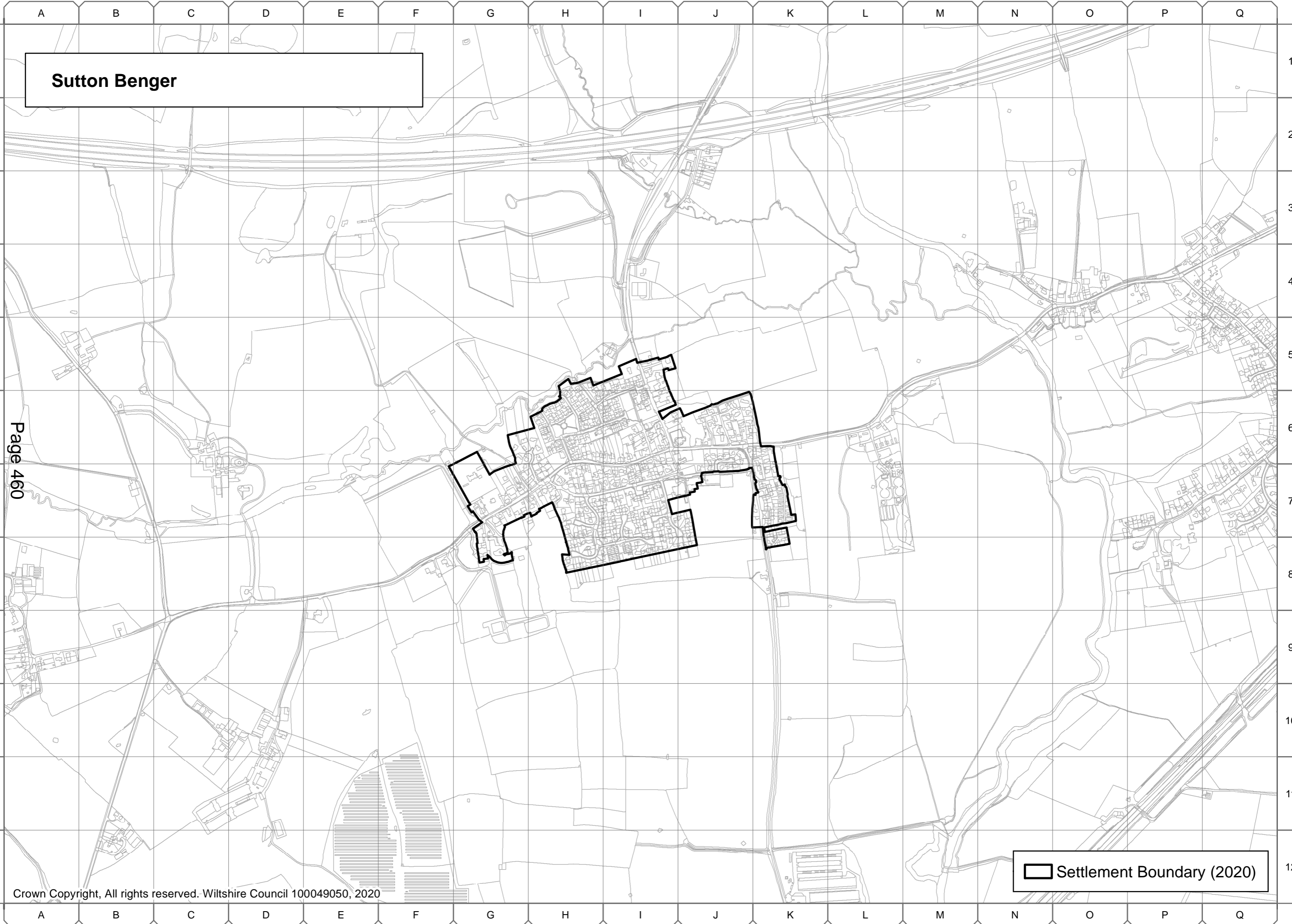
Page 459




 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

Sutton Benger

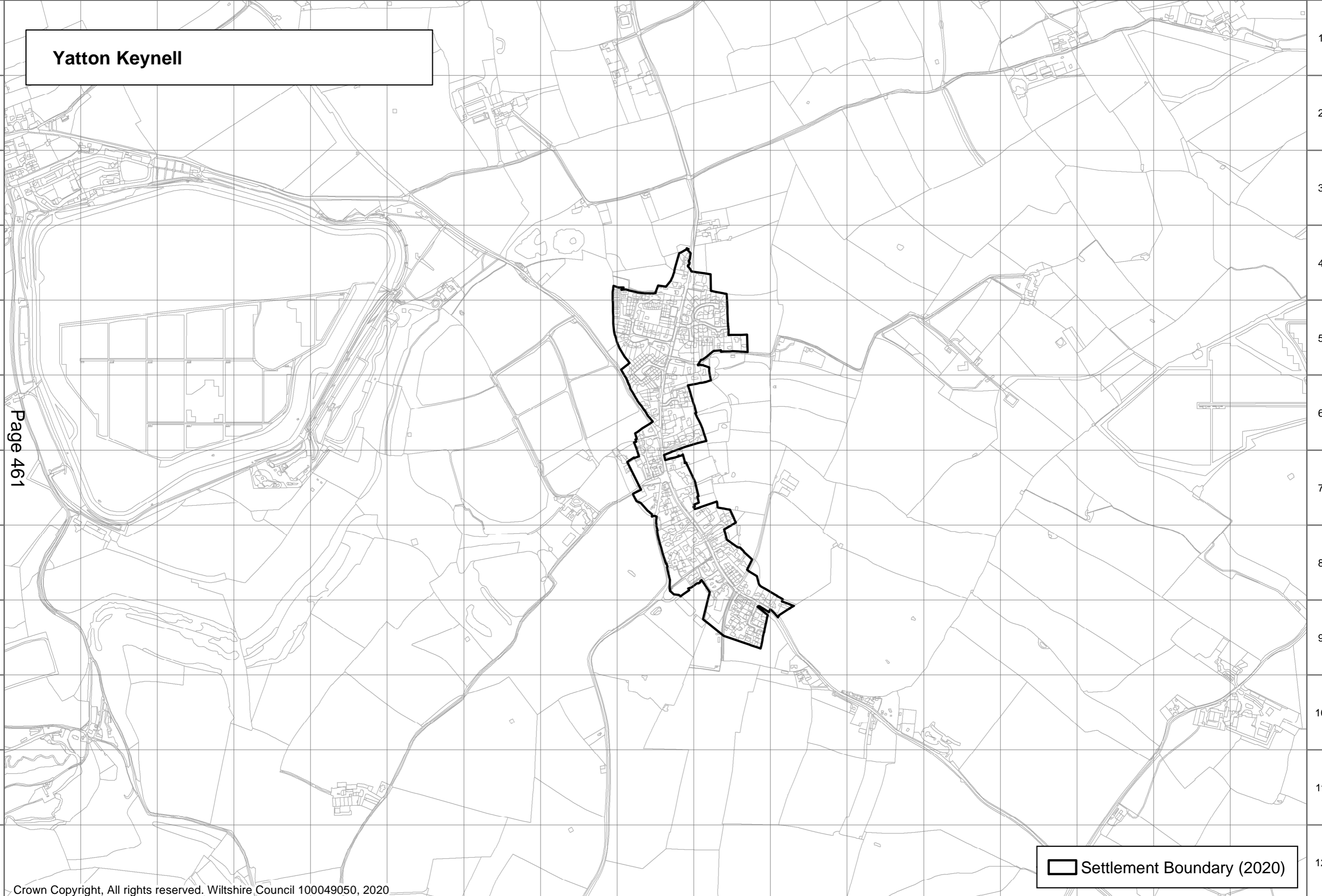


 Settlement Boundary (2020)


A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

Yatton Keynell



Page 461

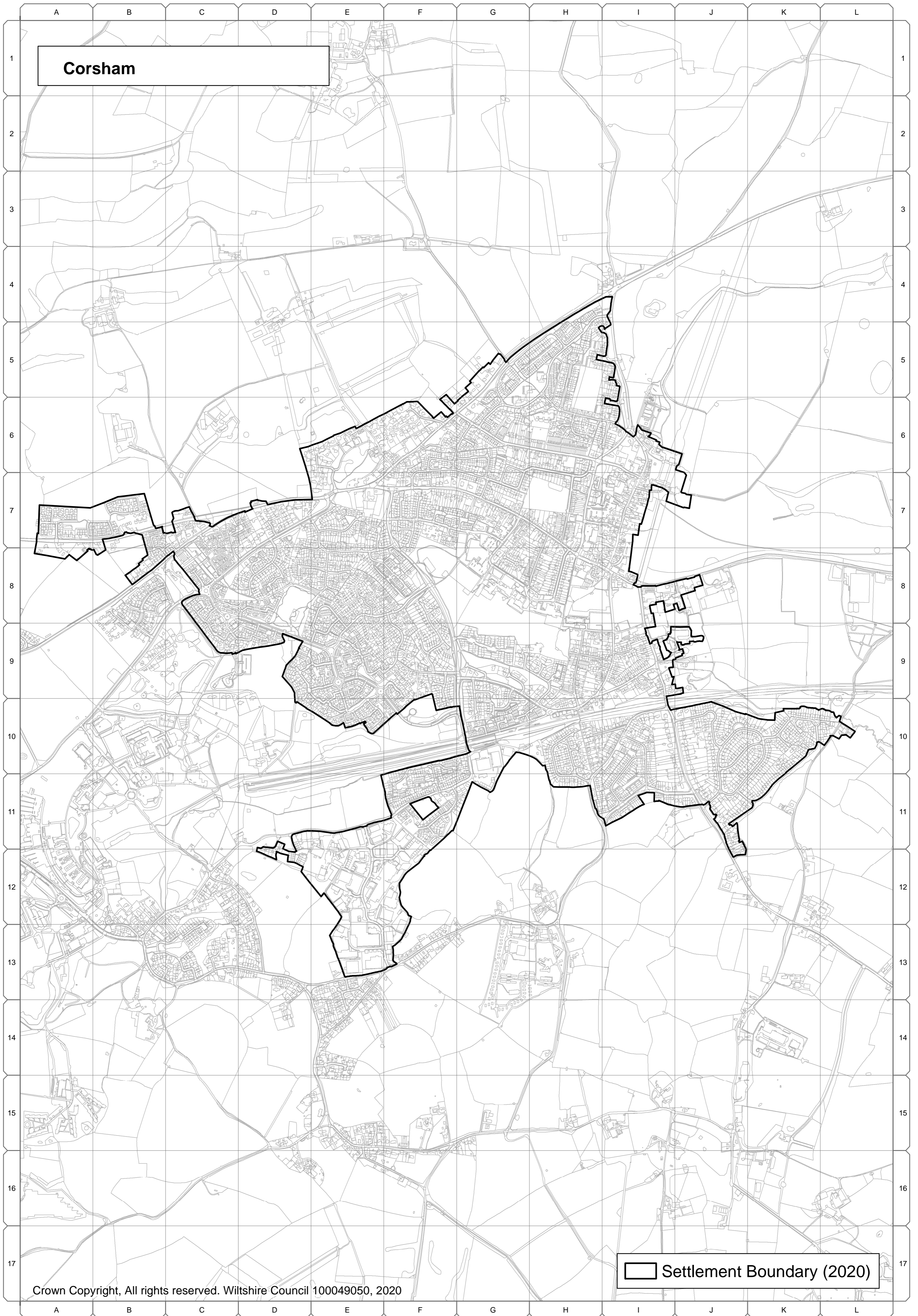
 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

Corsham Community Area

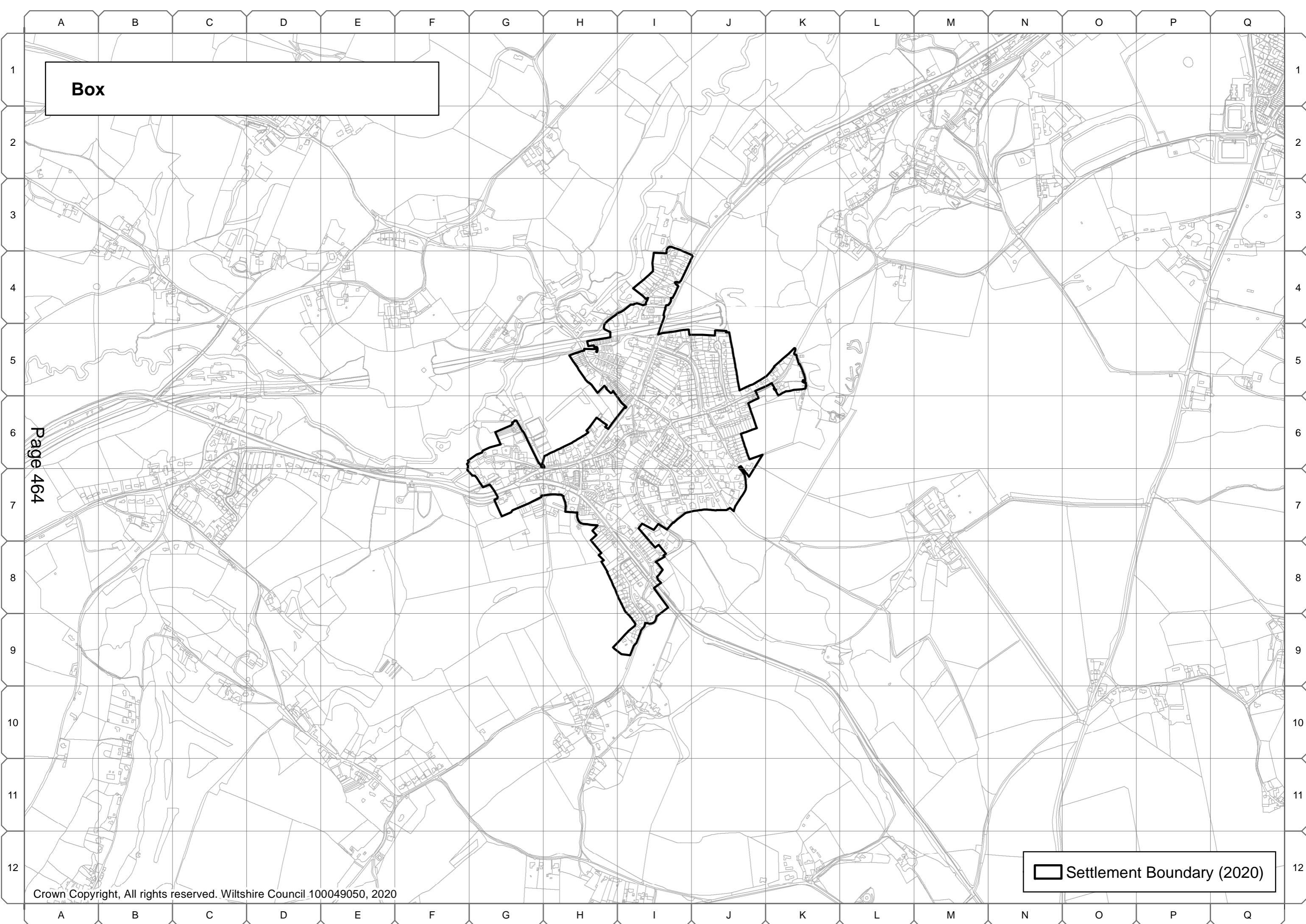
A.39 The following settlement boundaries in the Corsham Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Corsham
- Box
- Colerne, and
- Rudloe



Corsham

Settlement Boundary (2020)

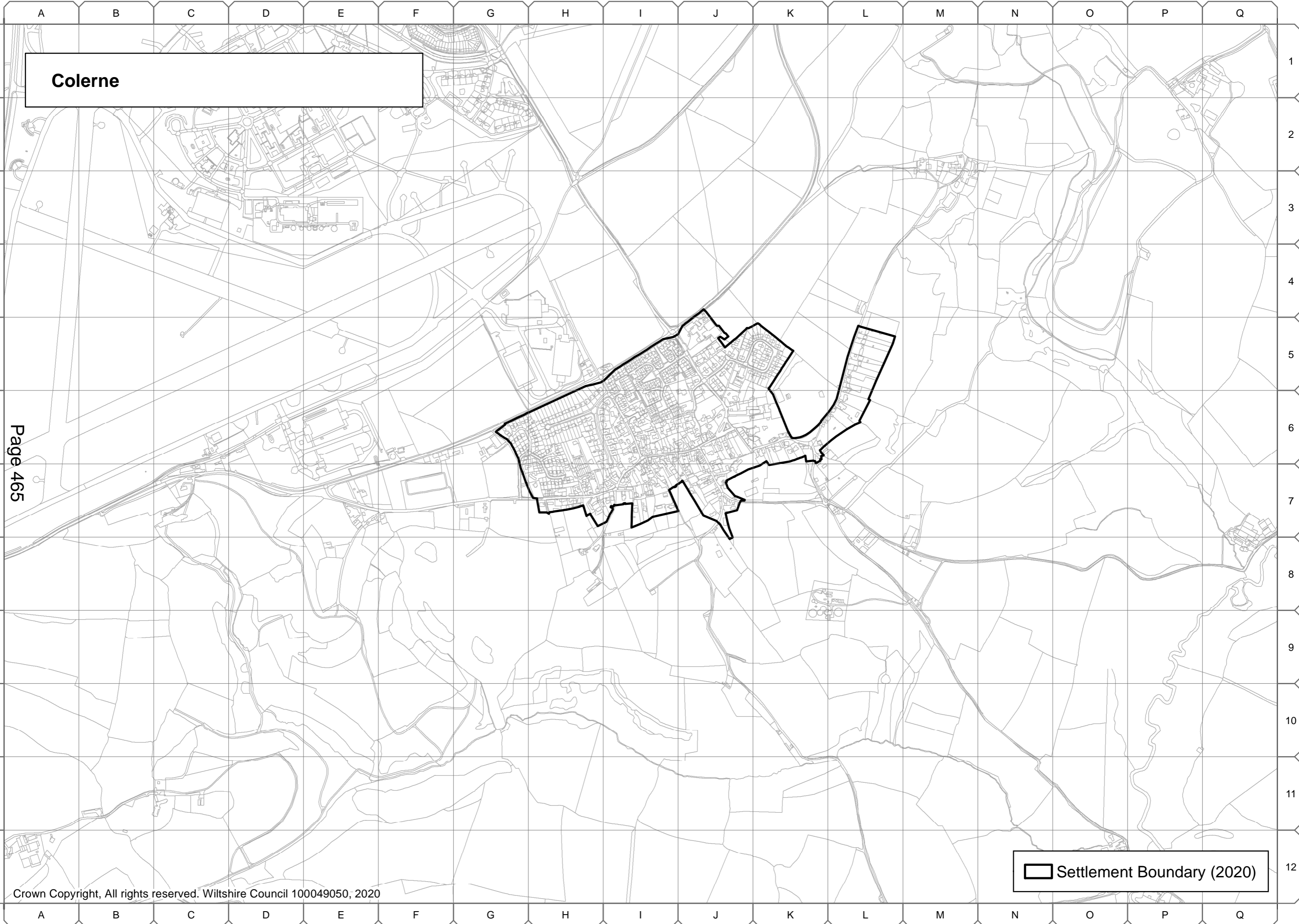


Box


Page 464

 Settlement Boundary (2020)

Colerne



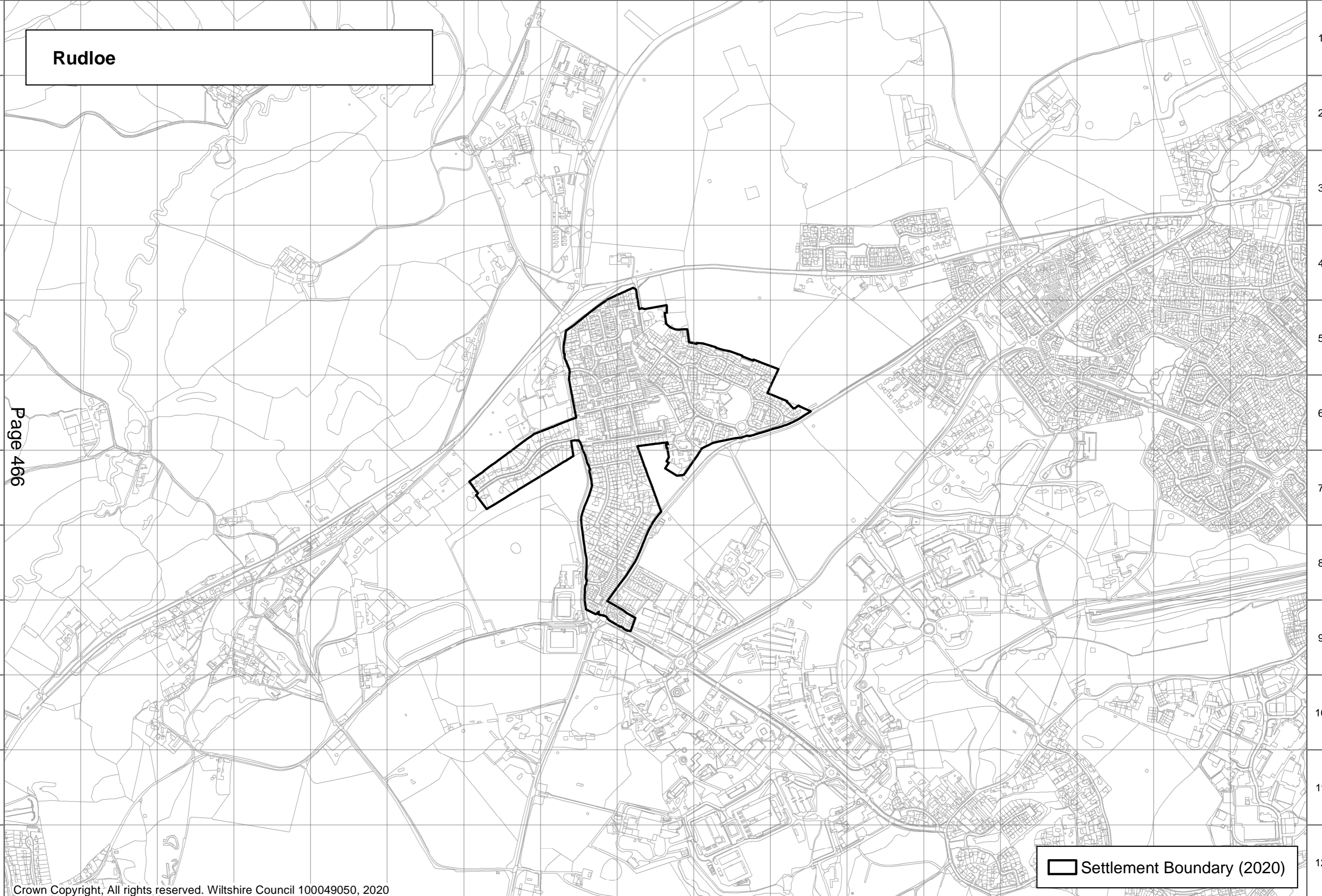
Page 465

 Settlement Boundary (2020)


A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

Rudloe



Page 466

 Settlement Boundary (2020)

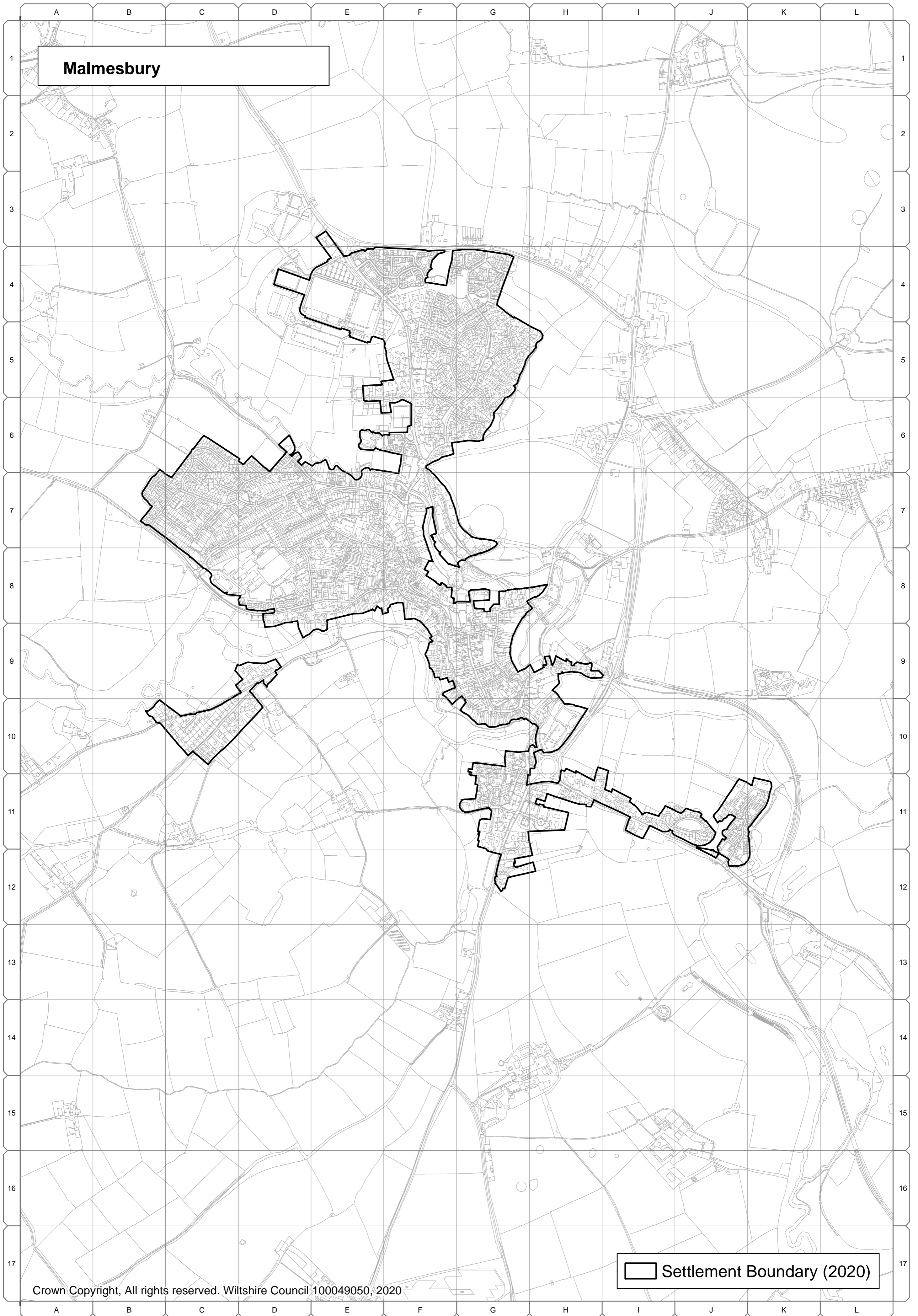
A B C D E F G H I J K L M N O P Q

Malmesbury Community Area

A.44 The following settlement boundaries in the Malmesbury Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Malmesbury
- Ashton Keynes
- Crudwell, and
- Sherston

A.45 The settlement boundaries for Great Somerford and Oaksey have not been reviewed because of a neighbourhood plans.




Malmesbury

Settlement Boundary (2020)

Ashton Keynes

Page 469

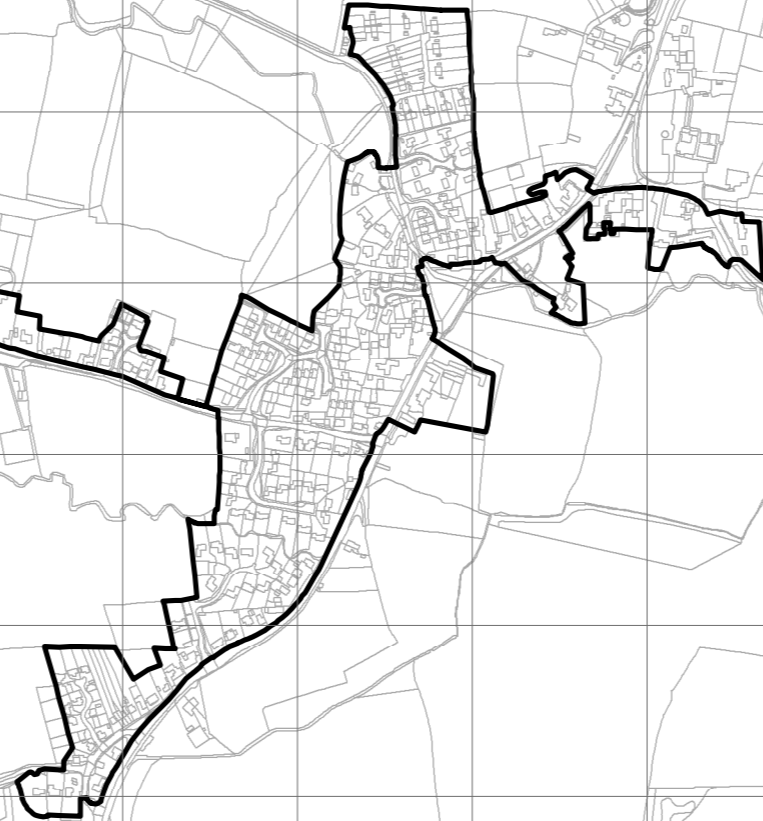
 Settlement Boundary (2020)


A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

Crudwell

Page 470



 Settlement Boundary (2020)

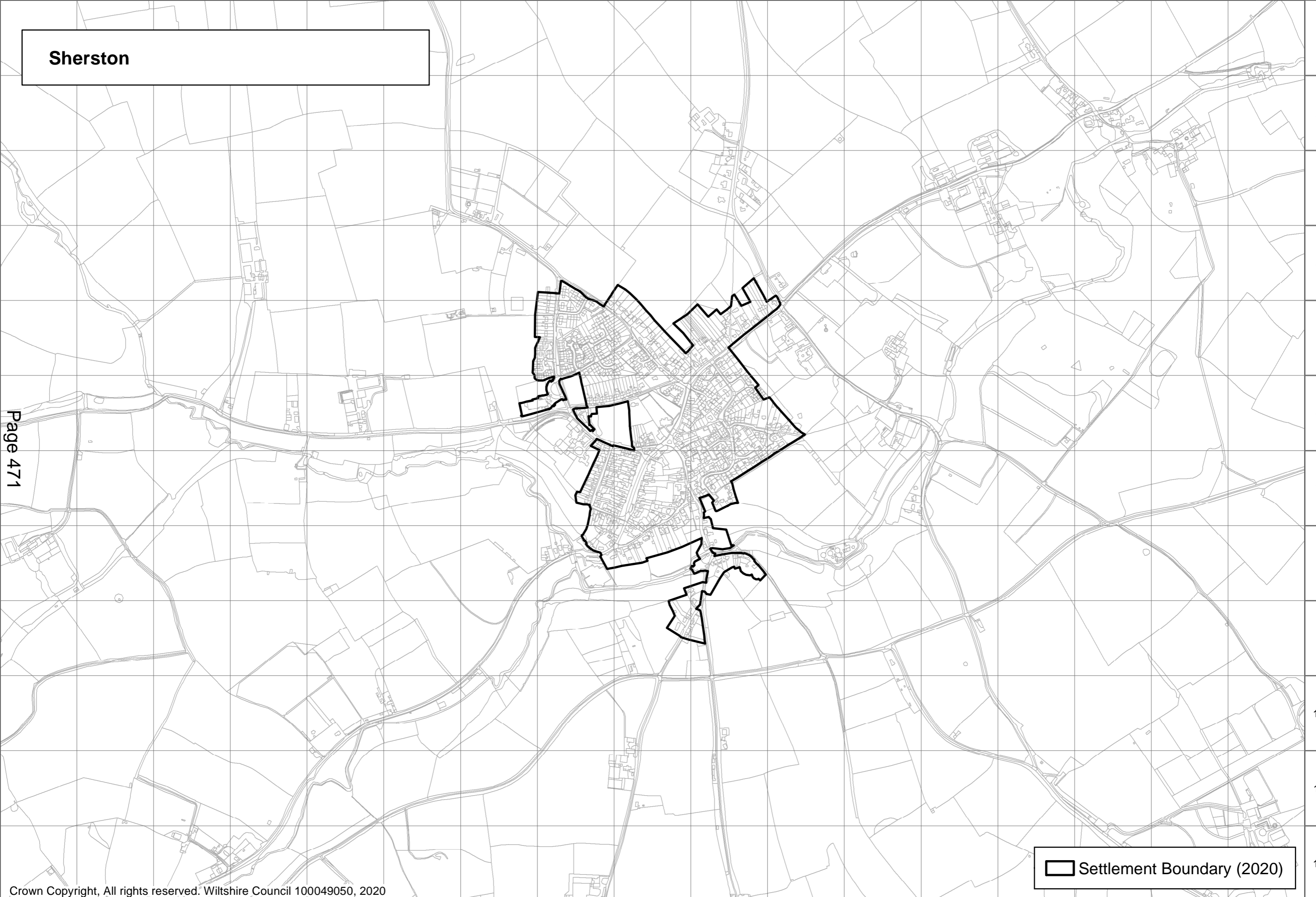
A B C D E F G H I J K L M N O P Q

A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Sherston



Page 471

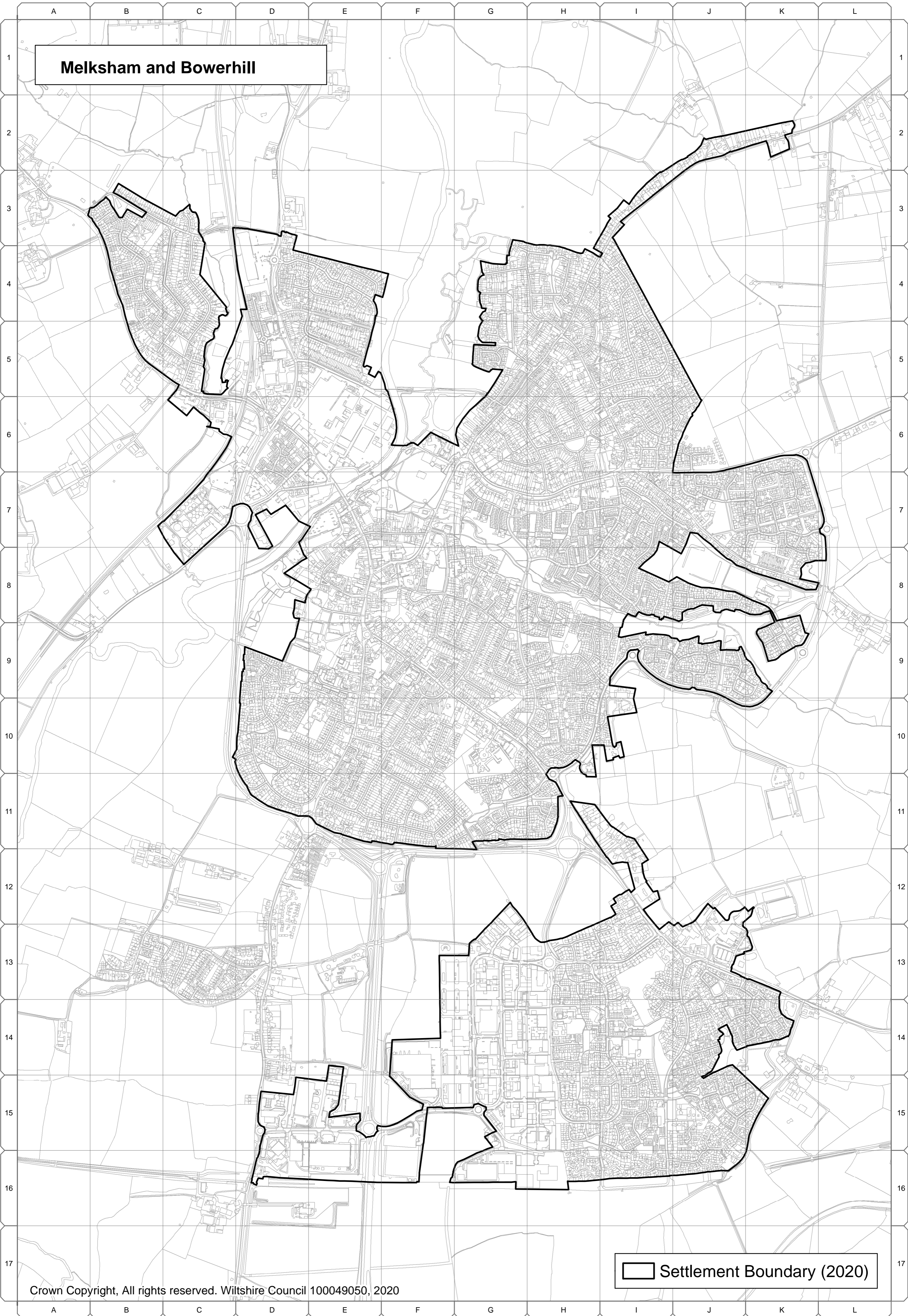
 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

Melksham Community Area

A.50 The following settlement boundaries in the Melksham Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Melksham and Bowerhill
- Atworth
- Seend
- Semington
- Shaw and Whitley, and
- Steeple Ashton



Melksham and Bowerhill

Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Atworth



Page 474

 Settlement Boundary (2020)

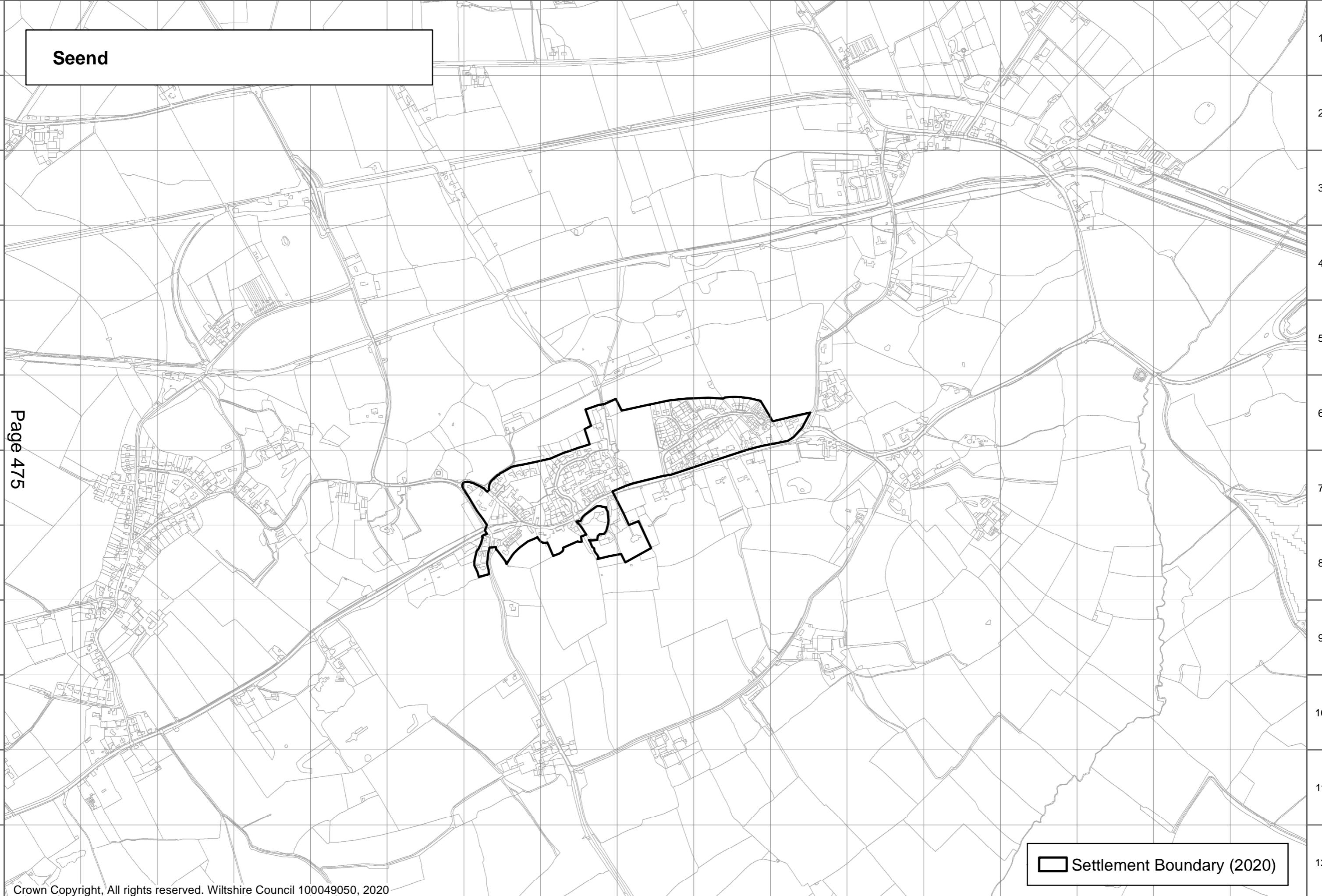
A B C D E F G H I J K L M N O P Q

A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Seend

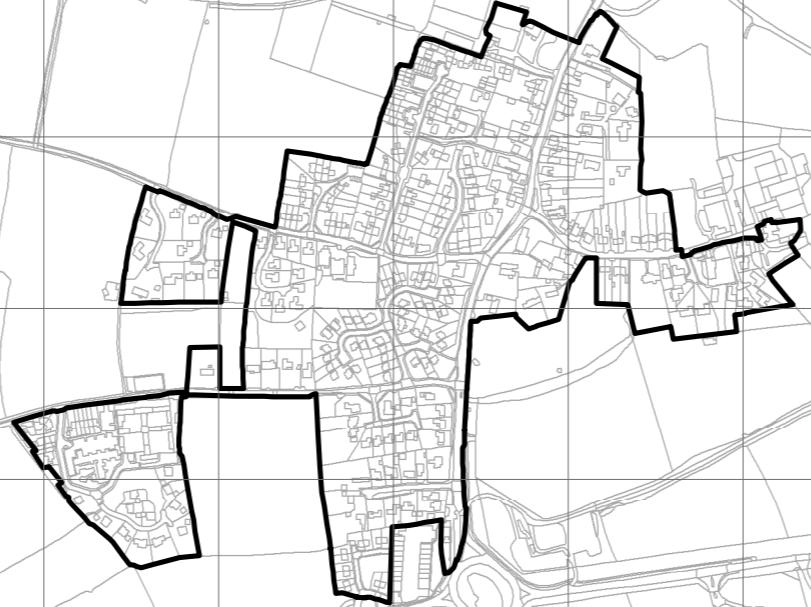



Page 475

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

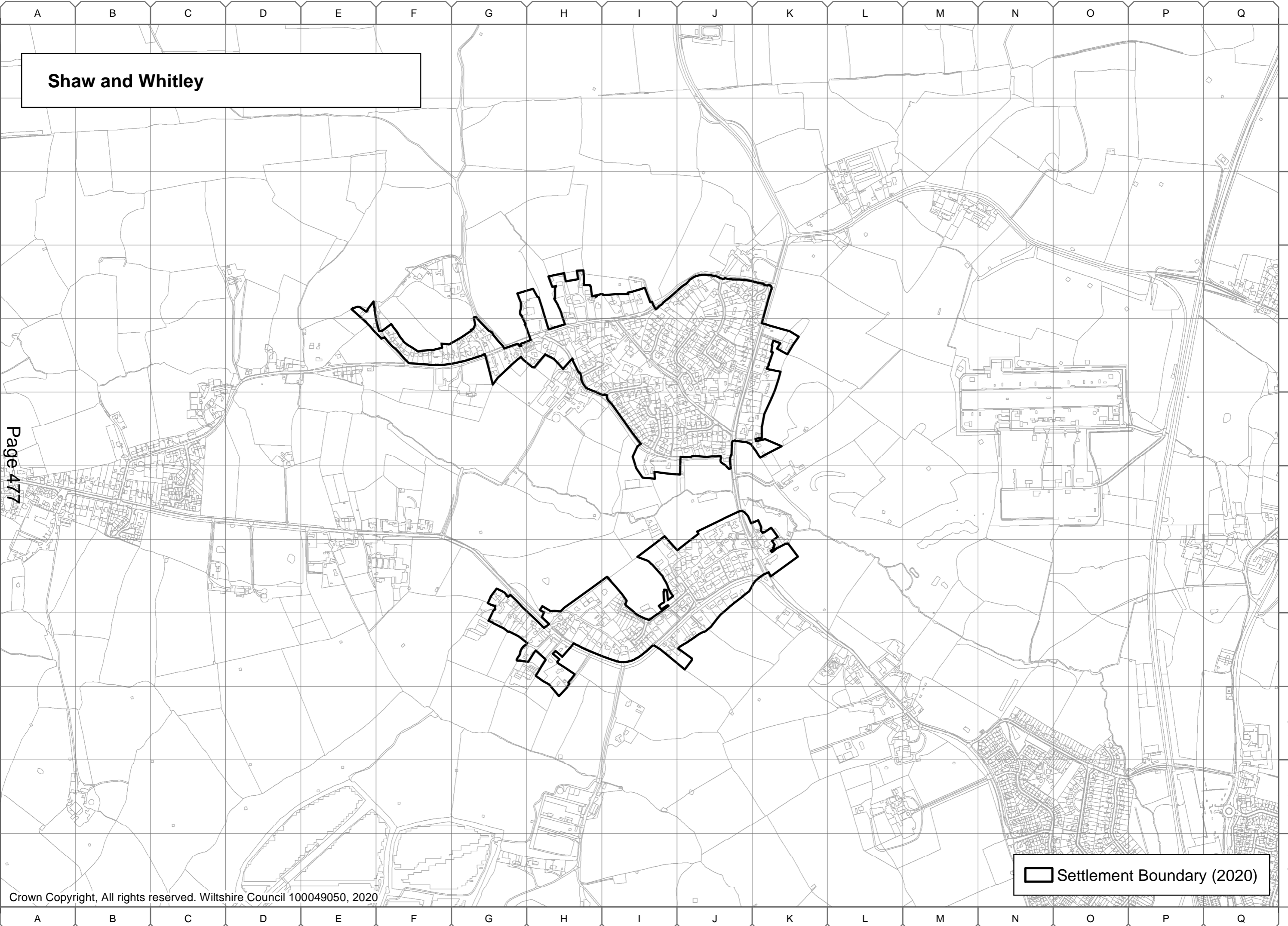
Semington



 Settlement Boundary (2020)

Shaw and Whitley

 Settlement Boundary (2020)



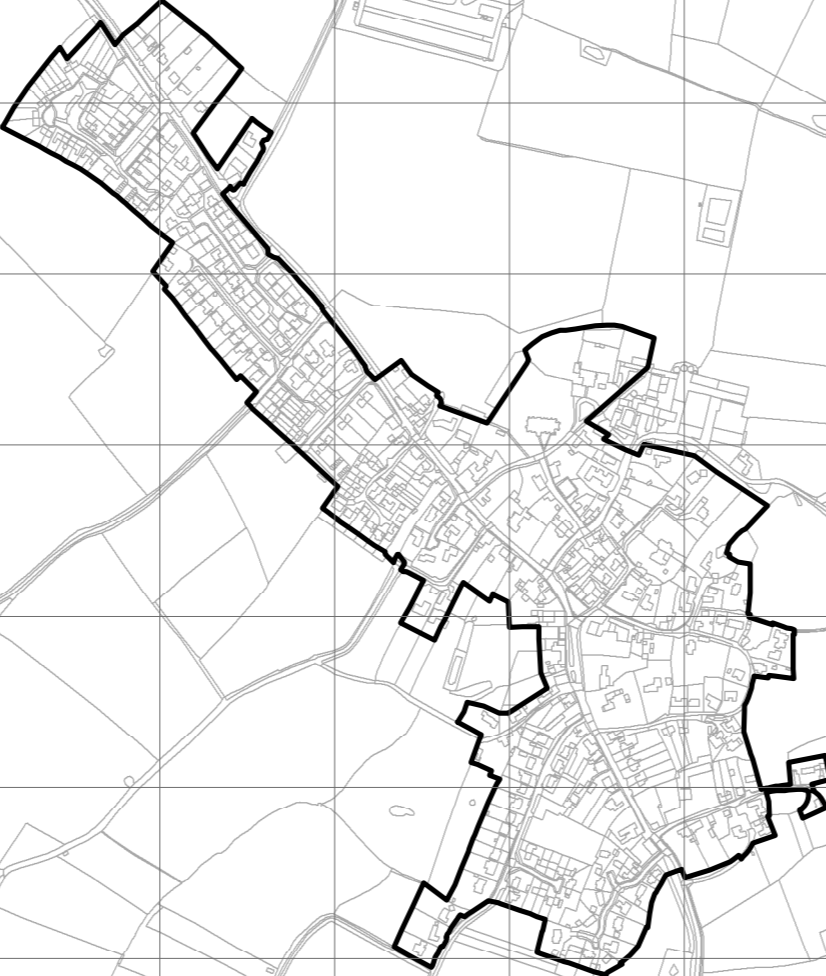
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

Steeple Ashton

1
2
3
4
5
6
7
8
9
10
11
12

Page 478



 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

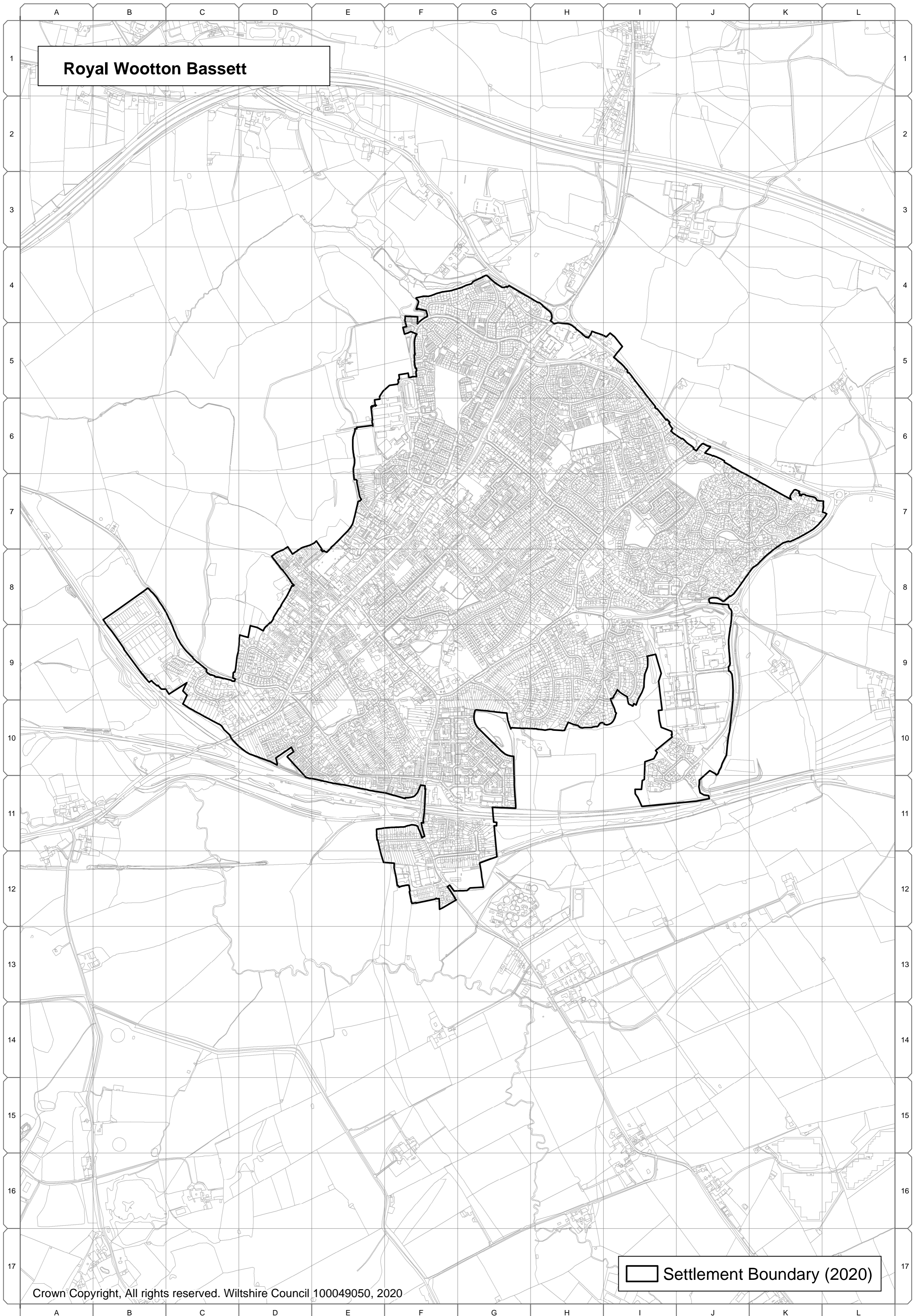
Royal Wootton Bassett and Cricklade Community Area

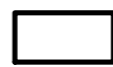
A.57 The following settlement boundaries in the Royal Wootton Bassett and Cricklade Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Royal Wootton Bassett
- Lyneham, and
- Purton

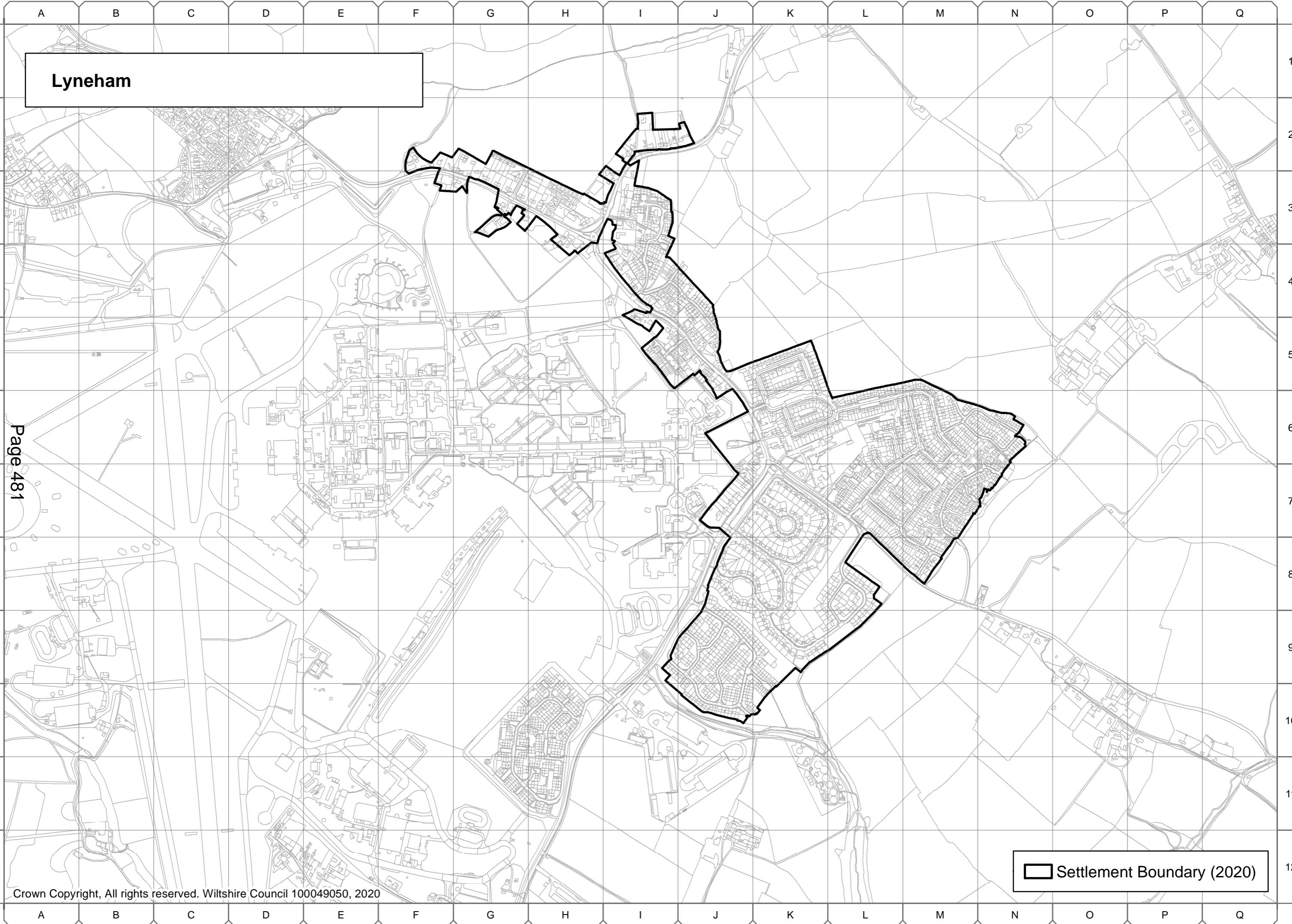
A.58 *The settlement boundary for Cricklade has not been reviewed because of a neighbourhood plan.*


Royal Wootton Bassett



 Settlement Boundary (2020)

Lyneham



 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

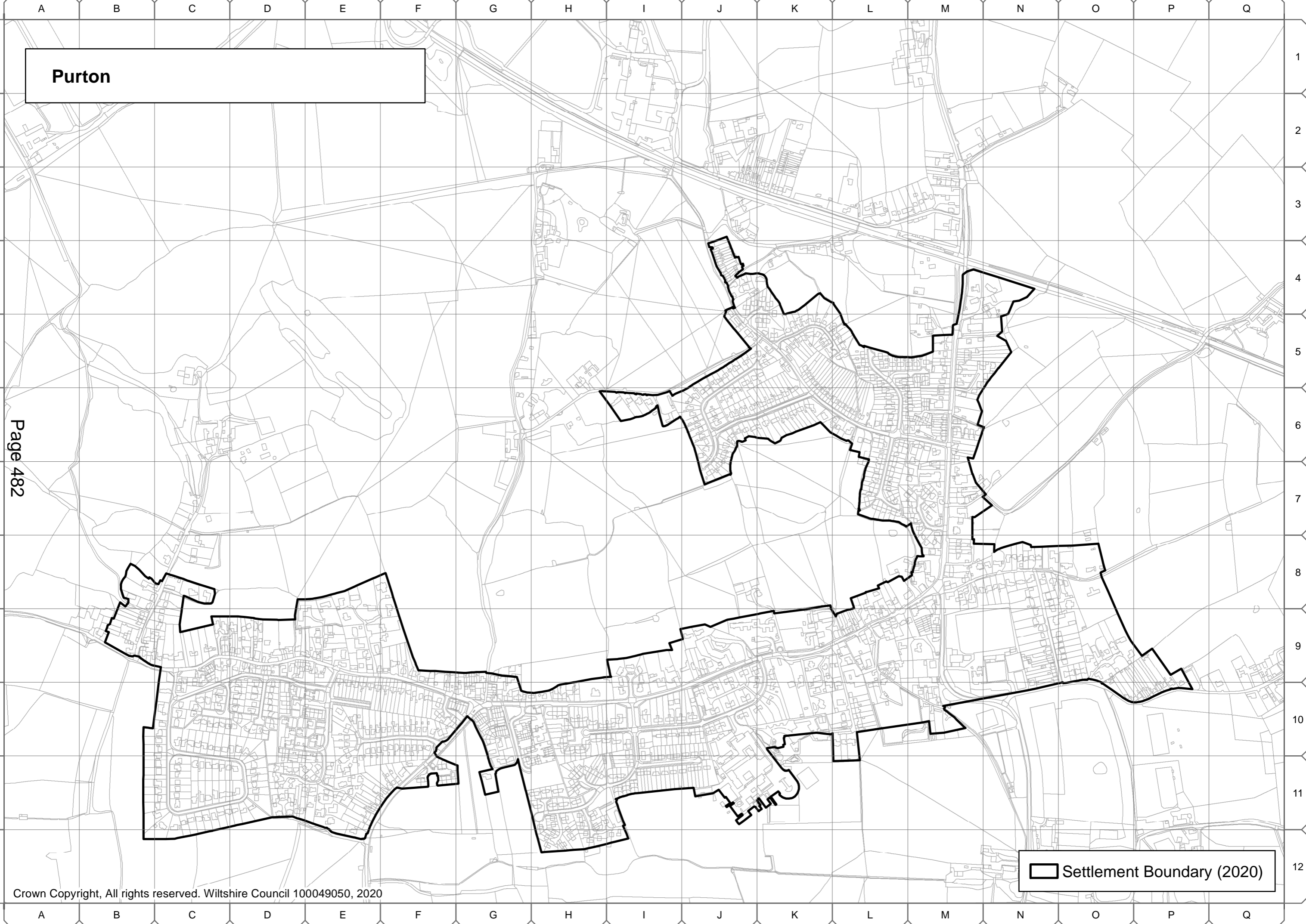
1
2
3
4
5
6
7
8
9
10
11
12

Purton

Page 482

□ Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q



Trowbridge Community Area

A.62 The following settlement boundaries in the Trowbridge Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Trowbridge
- Hilperton
- North Bradley, and
- Southwick

Trowbridge



Page 484


A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

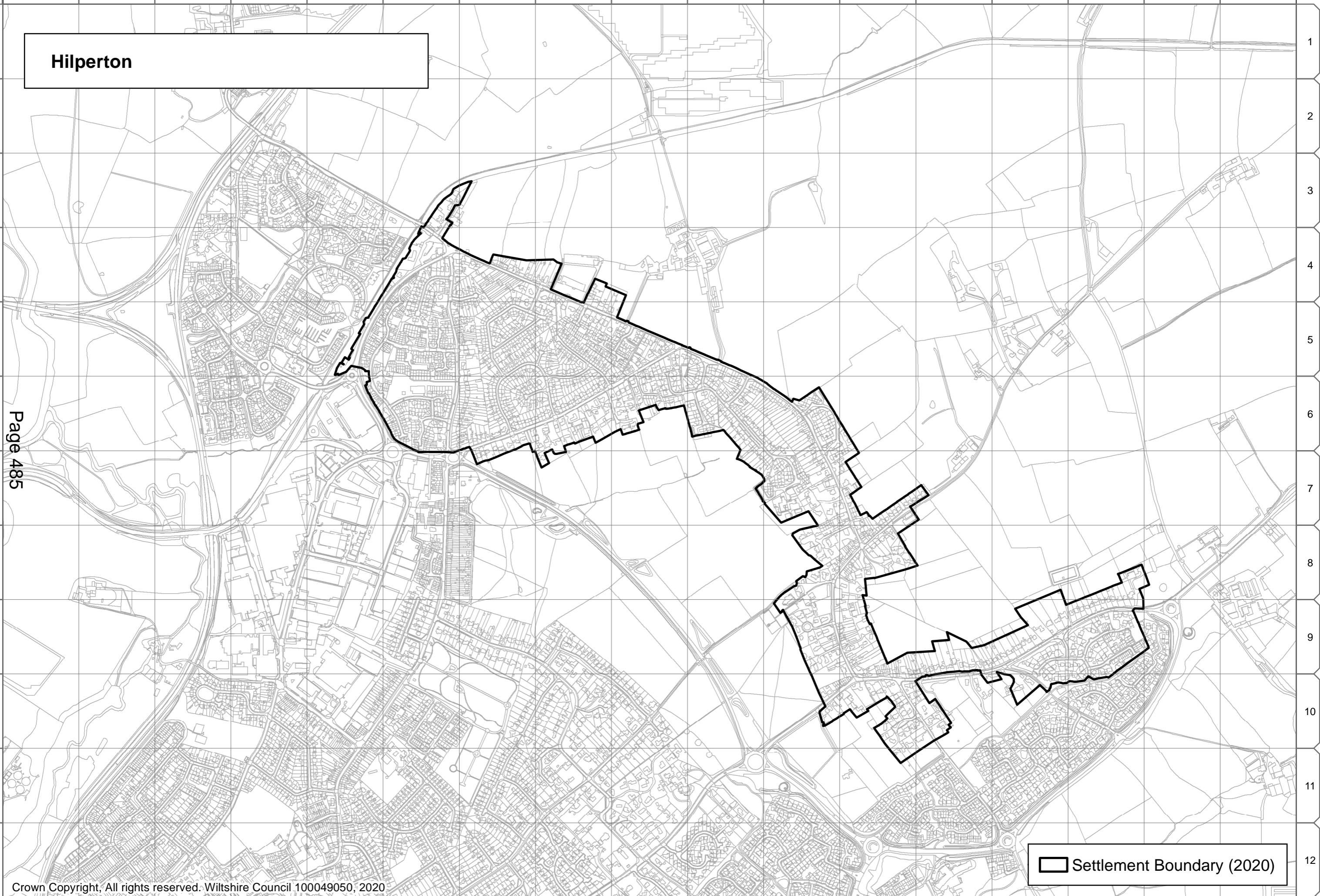
1
2
3
4
5
6
7
8
9
10
11
12

Hilperton

Page 485

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q



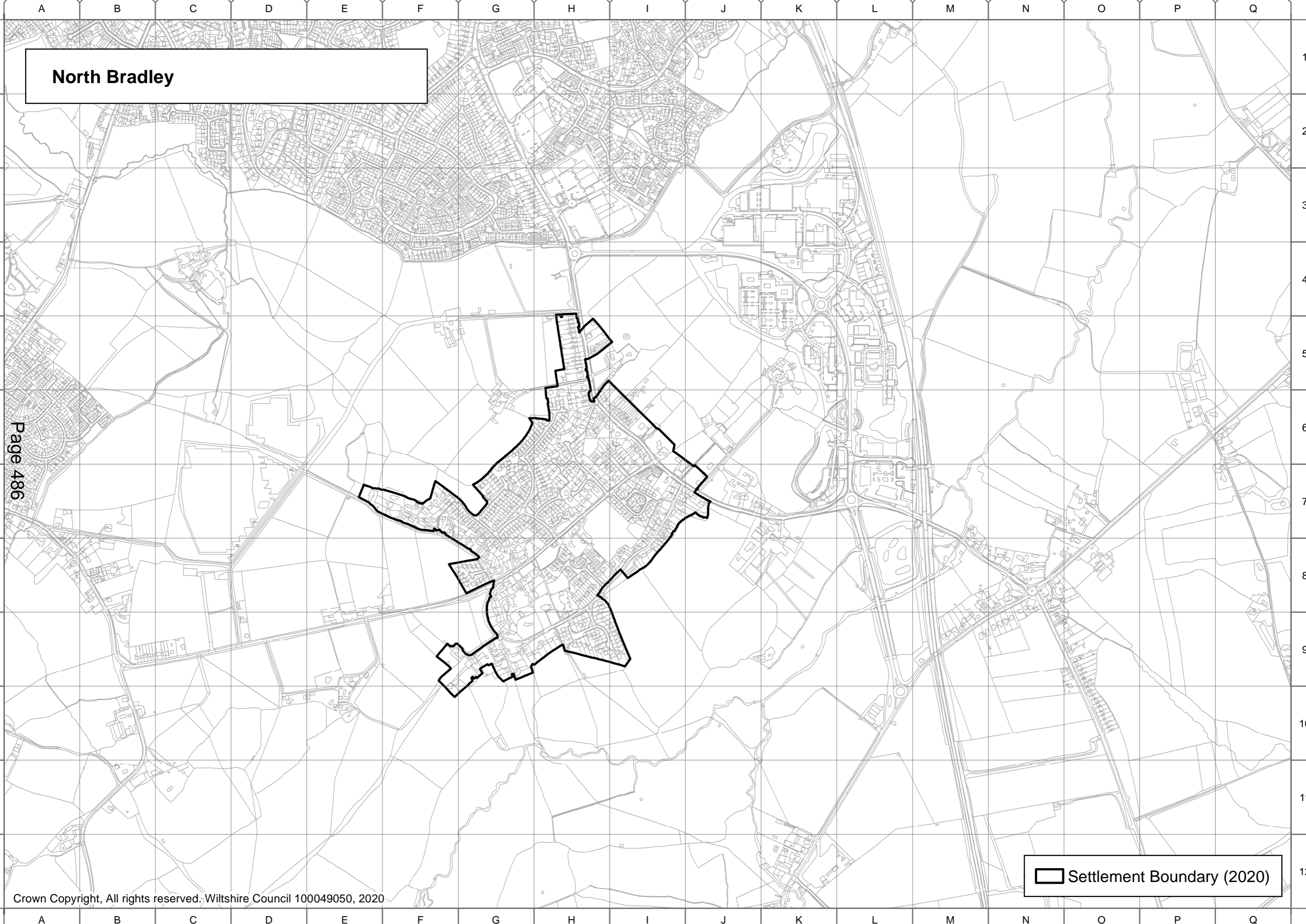
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

North Bradley

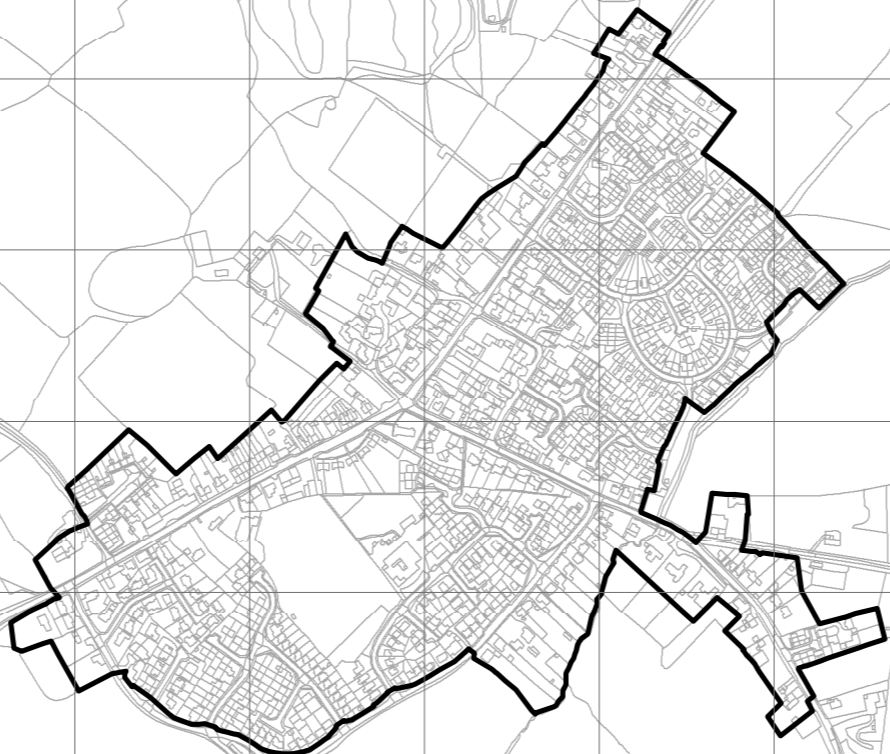
Page 486




 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

Southwick



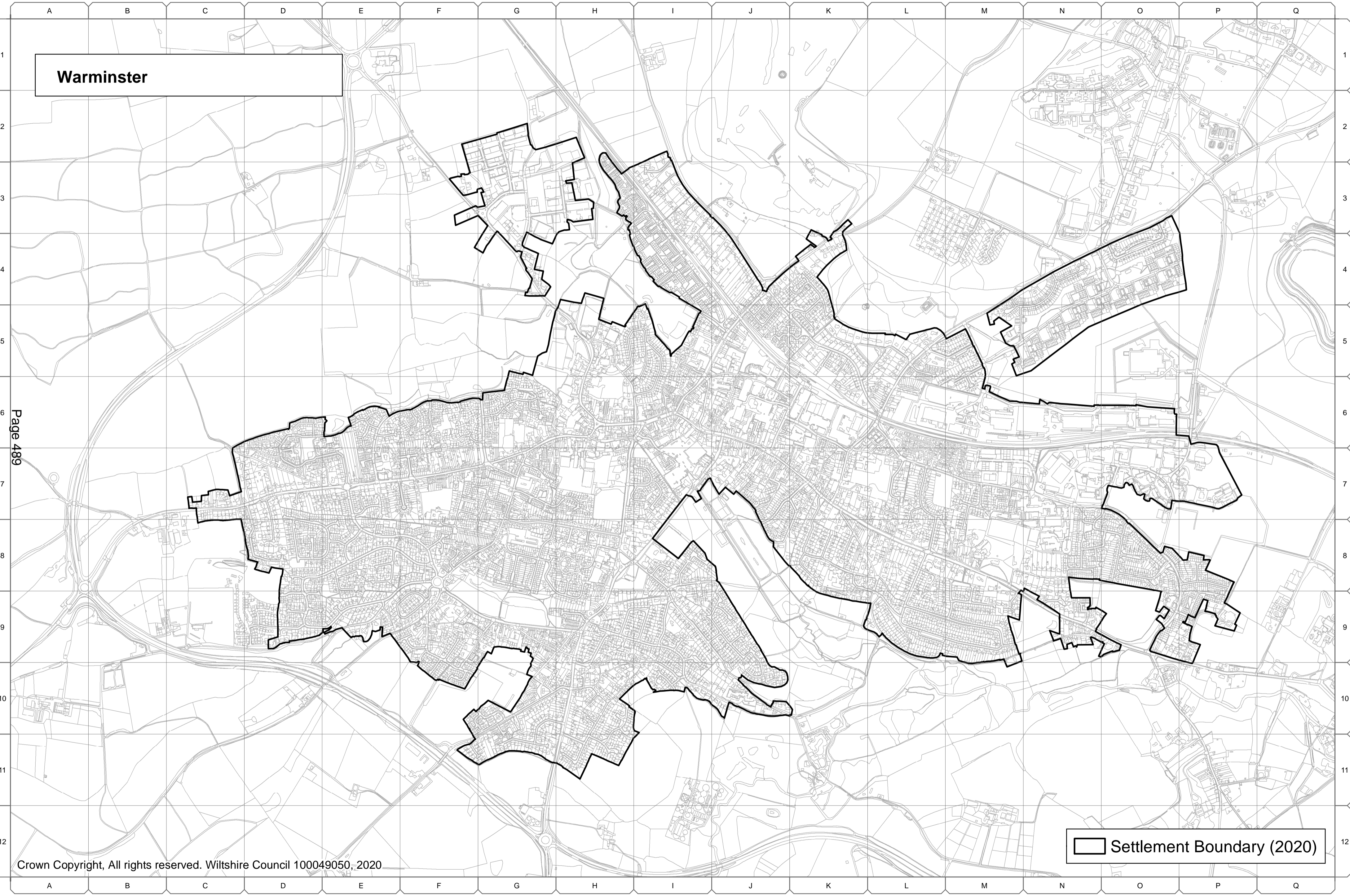
 Settlement Boundary (2020)

Warminster Community Area

A.67 The following settlement boundaries in the Warminster Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Warminster
- Chapmanslade
- Codford
- Corsley
- Heytesbury, and
- Sutton Veny

Warminster



Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

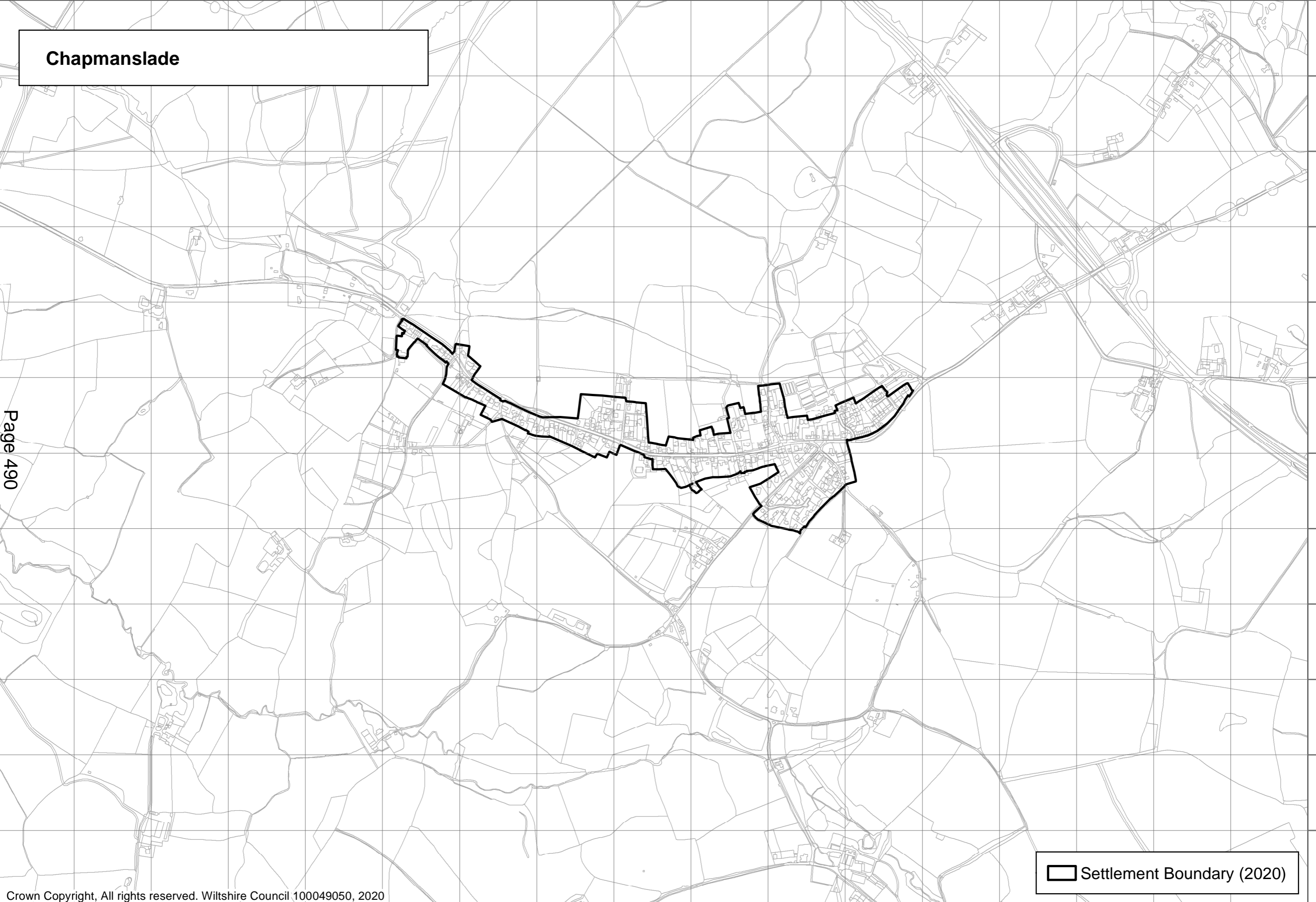
Chapmanslade

1
2
3
4
5
6
7
8
9
10
11
12

Page 490

A B C D E F G H I J K L M N O P Q

 Settlement Boundary (2020)

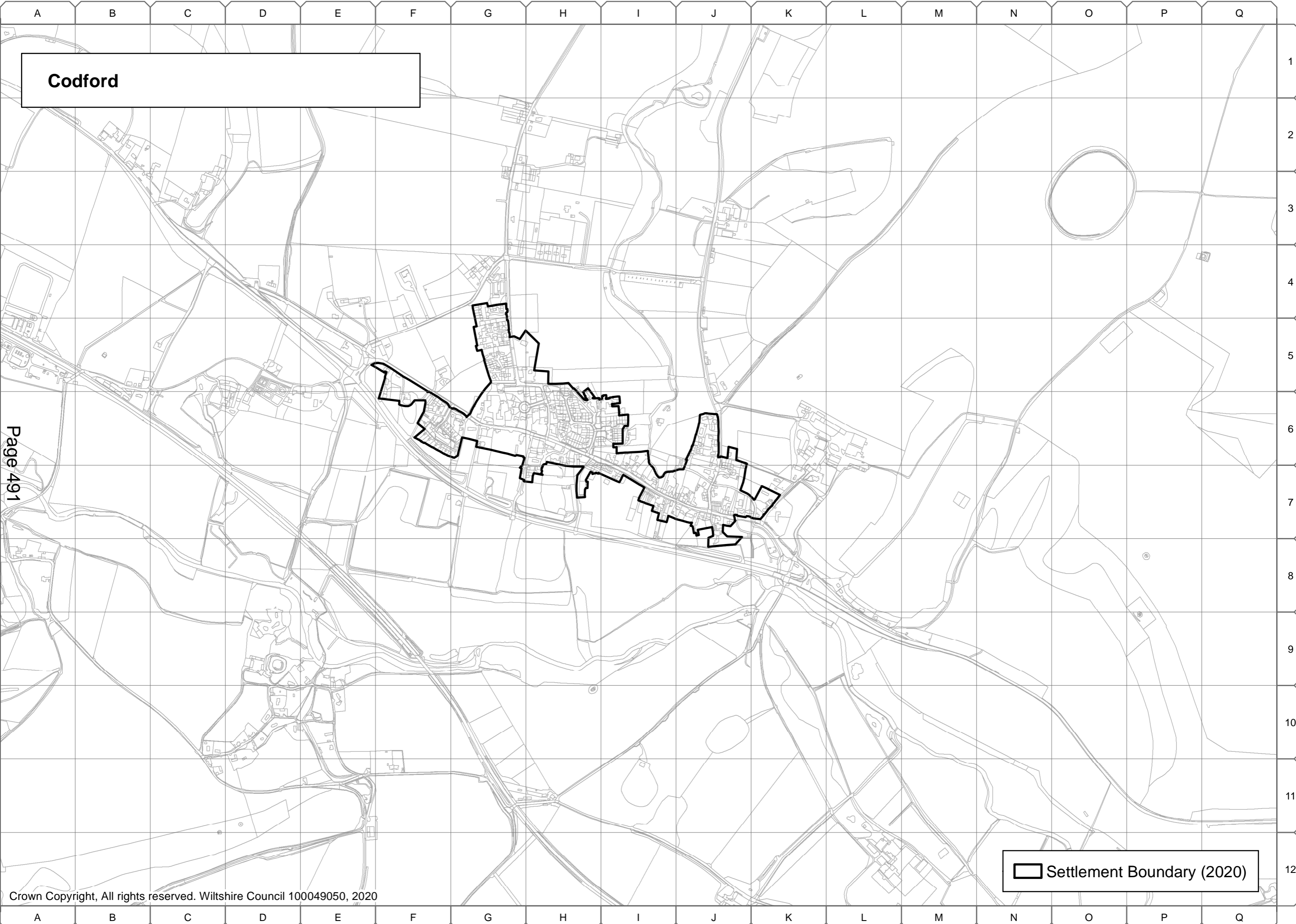


A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Codford



Page 491

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

Corsley

1
2
3
4
5
6
7
8
9
10
11
12

Page 492



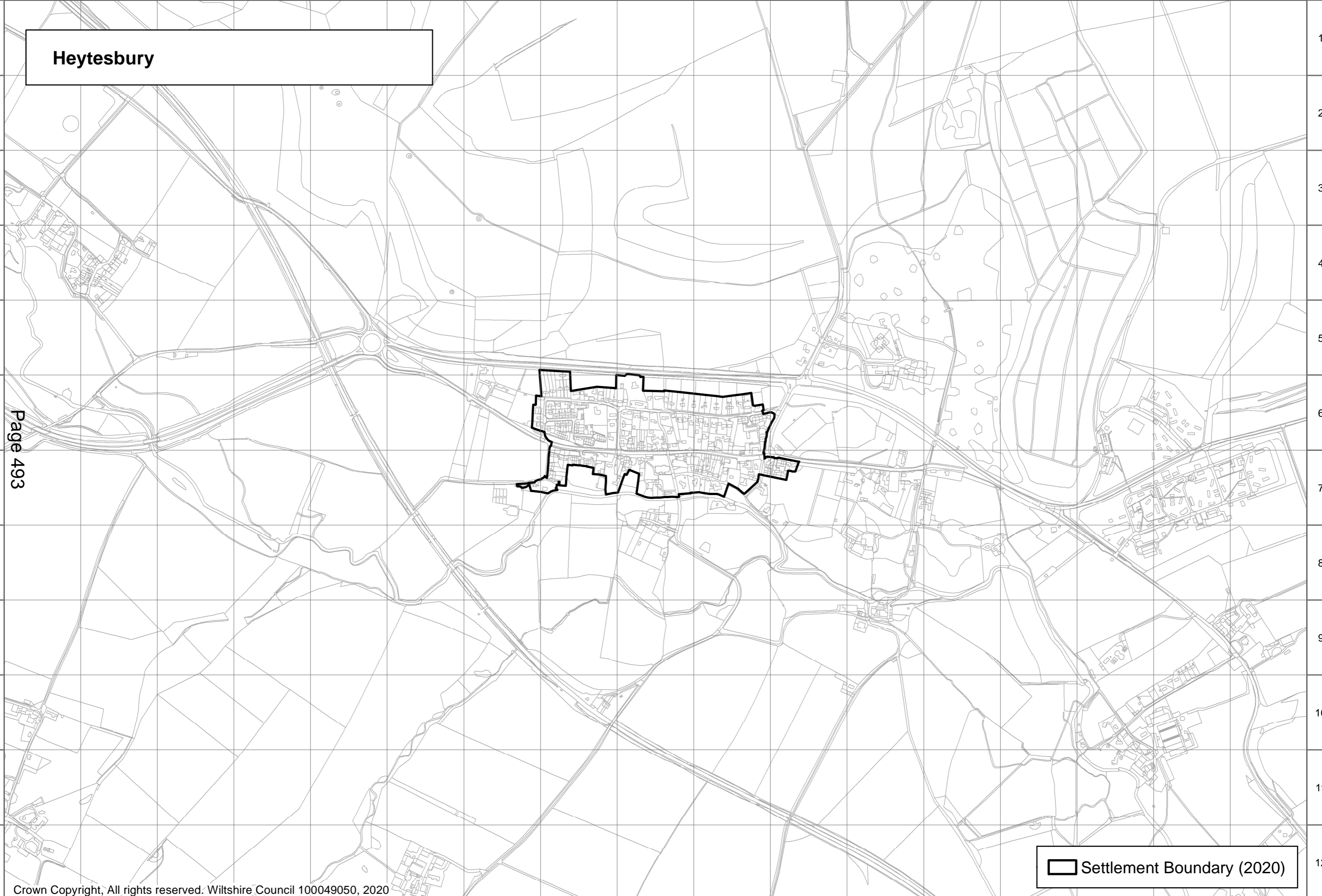
 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q


A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

Heytesbury




Page 493

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

Sutton Veny

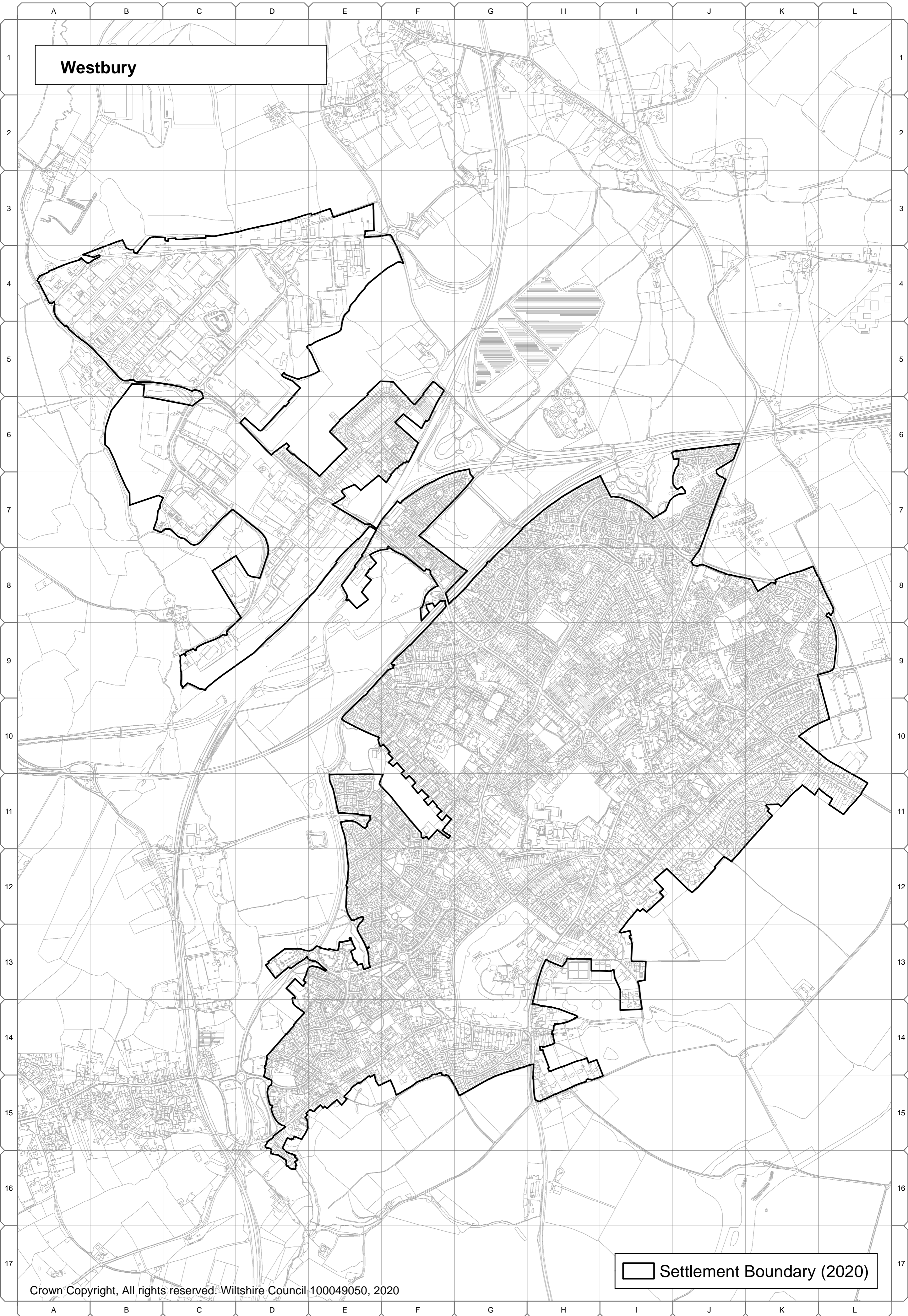


 Settlement Boundary (2020)

Westbury Community Area

A.74 The following settlement boundaries in the Westbury Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Westbury
- Bratton, and
- Dilton Marsh



Westbury

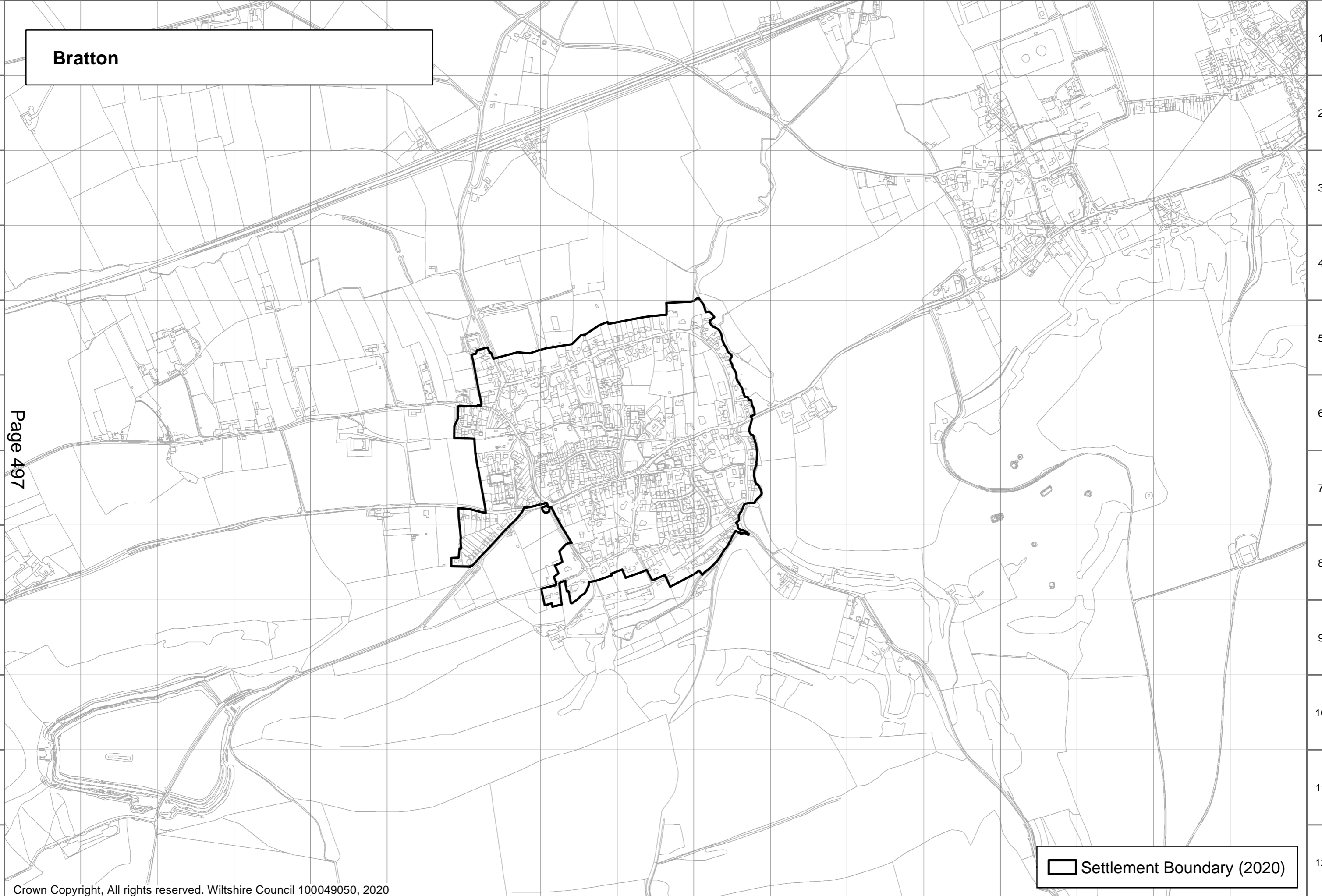
Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

Bratton

1
2
3
4
5
6
7
8
9
10
11
12



Page 497

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

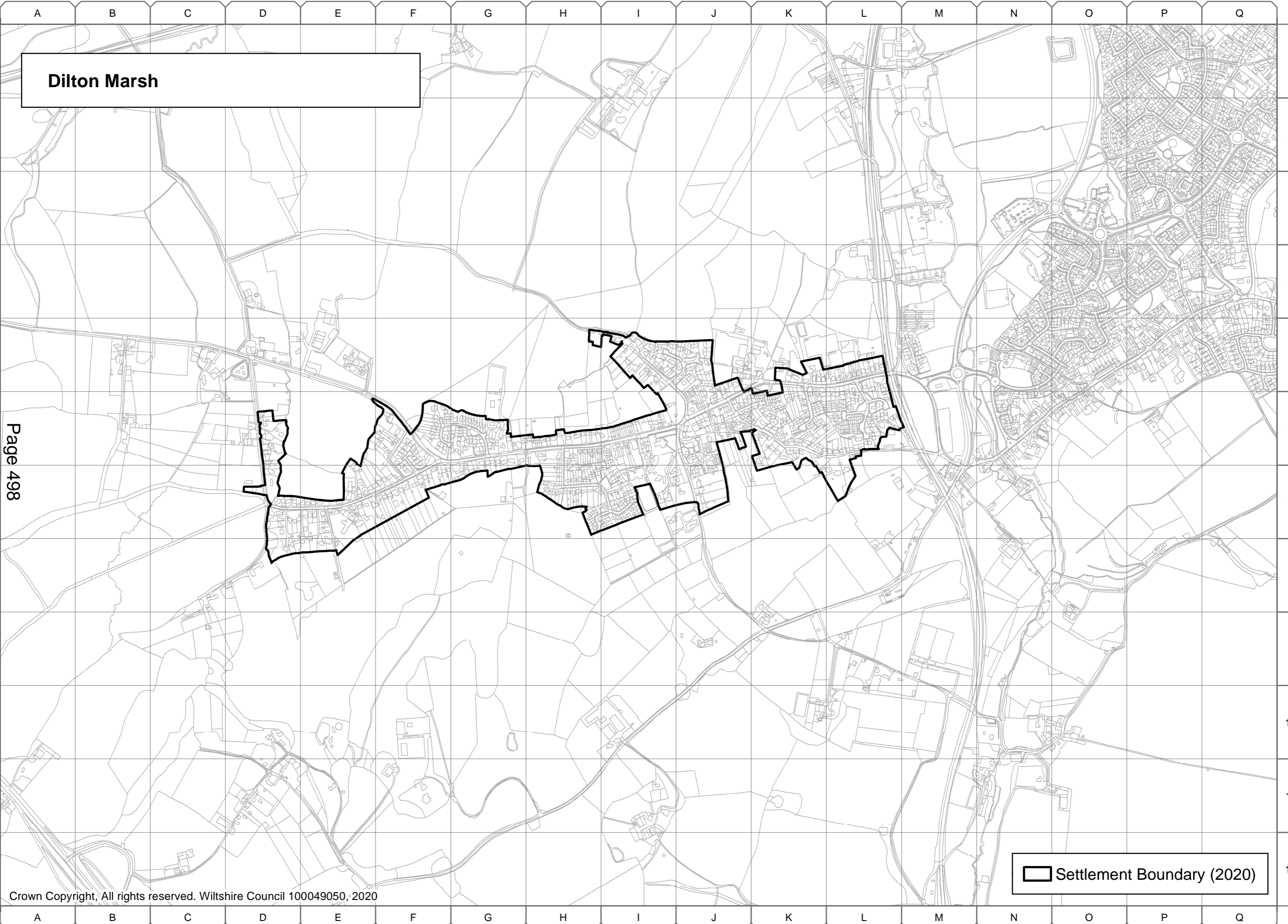
Dilton Marsh

1
2
3
4
5
6
7
8
9
10
11
12

Page 498

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q



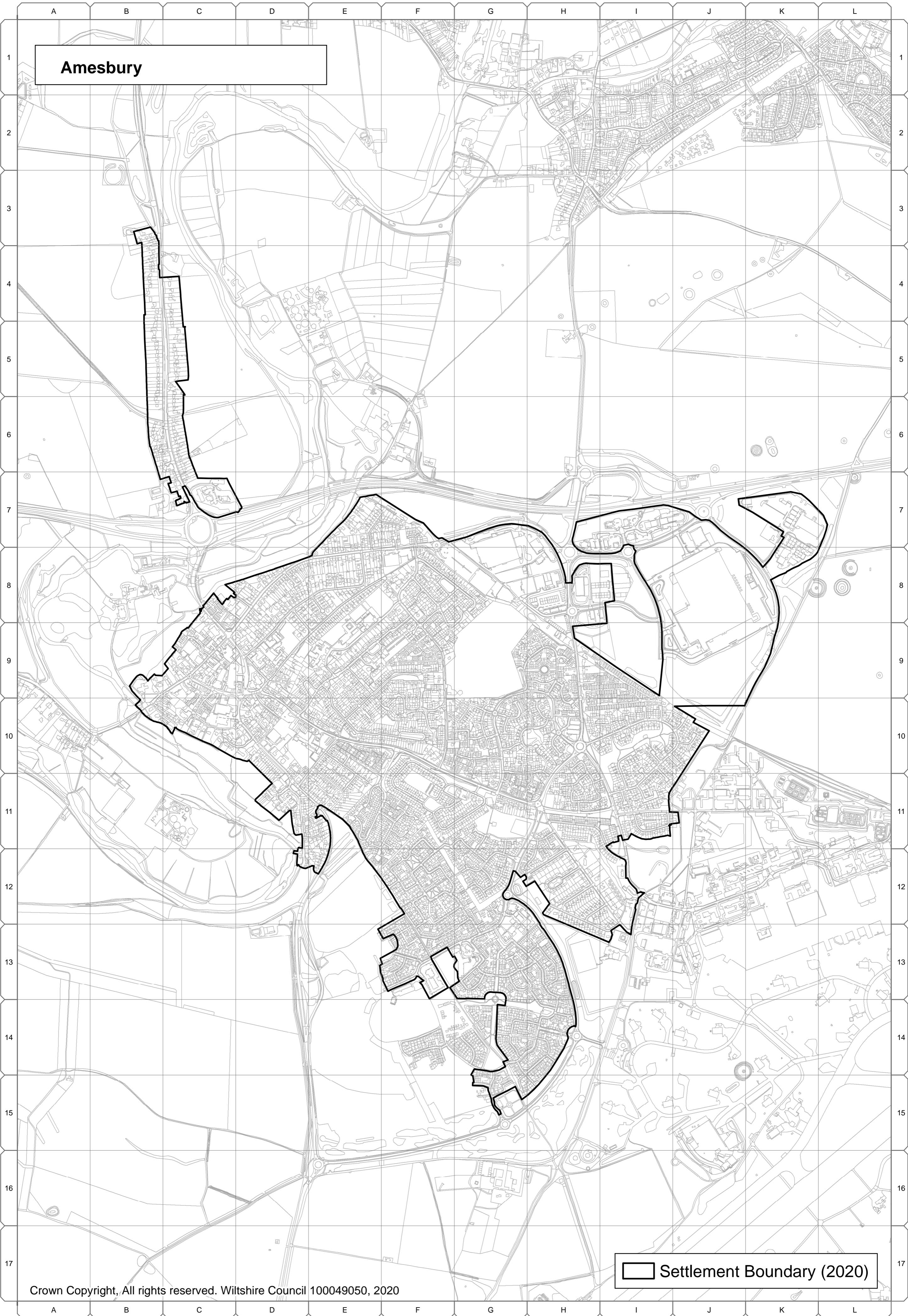
South Wiltshire Housing Market Area

Amesbury Community Area

A.78 The following settlement boundaries in the Amesbury Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Amesbury
- Bulford
- Durrington
- Great Wishford
- Shrewton
- The Winterbournes, and
- Tilshead

A.79 The settlement boundary for Porton has not been reviewed because of a neighbourhood plan (Idmiston NP).



Amesbury

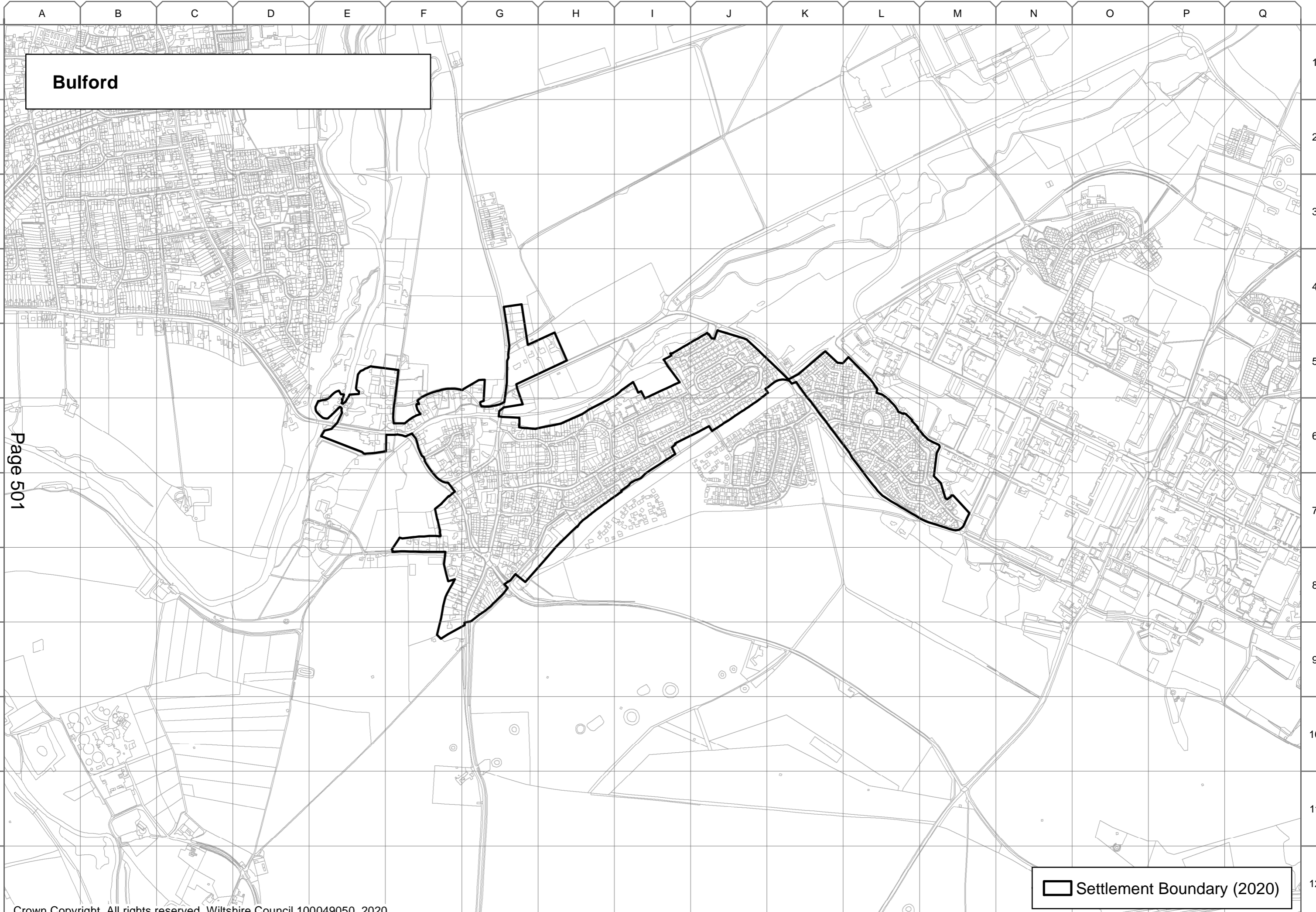
Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Bulford



Page 501

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

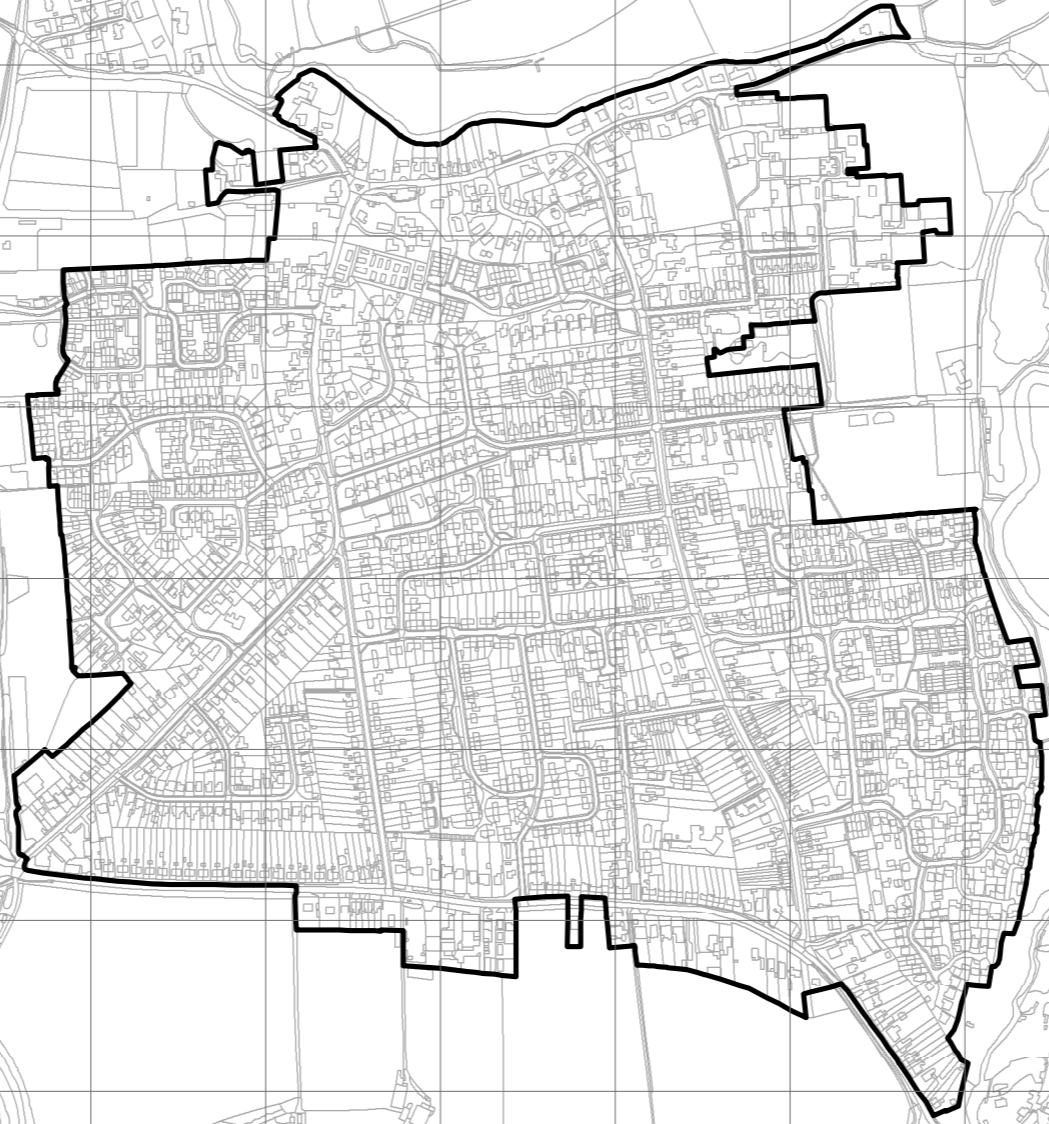
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Durrington

Page 502



 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

Great Wishford

1
2
3
4
5
6
7
8
9
10
11
12

Page 503

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q



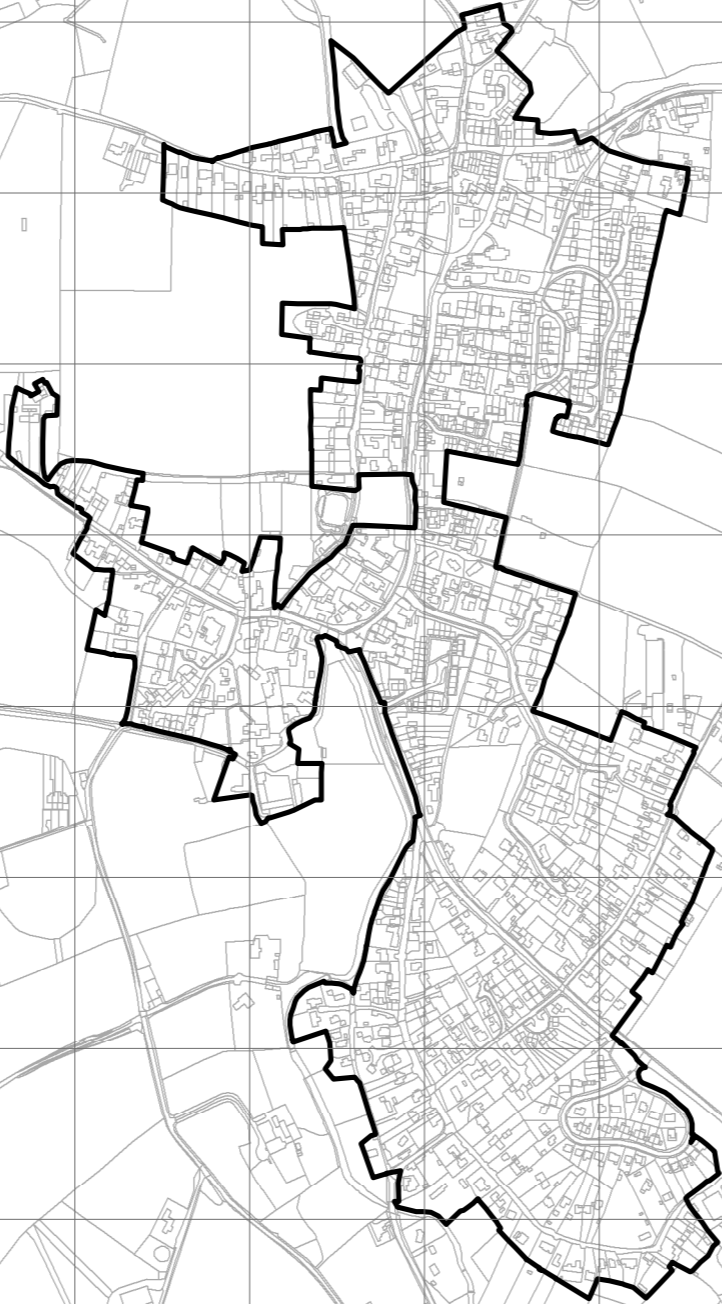
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

Shrewton

1
2
3
4
5
6
7
8
9
10
11
12

Page 504




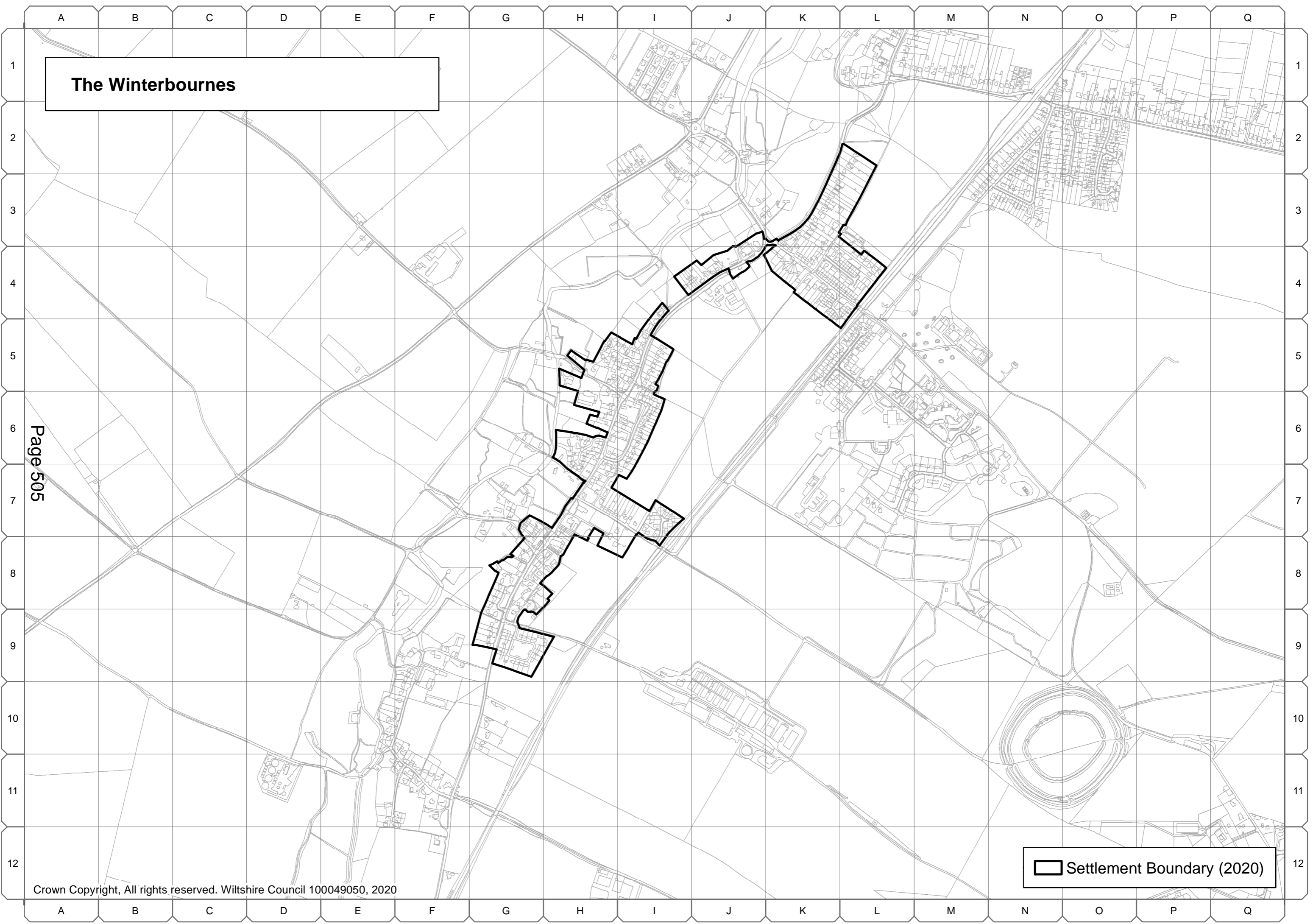
 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

The Winterbournes

Page 505

 Settlement Boundary (2020)



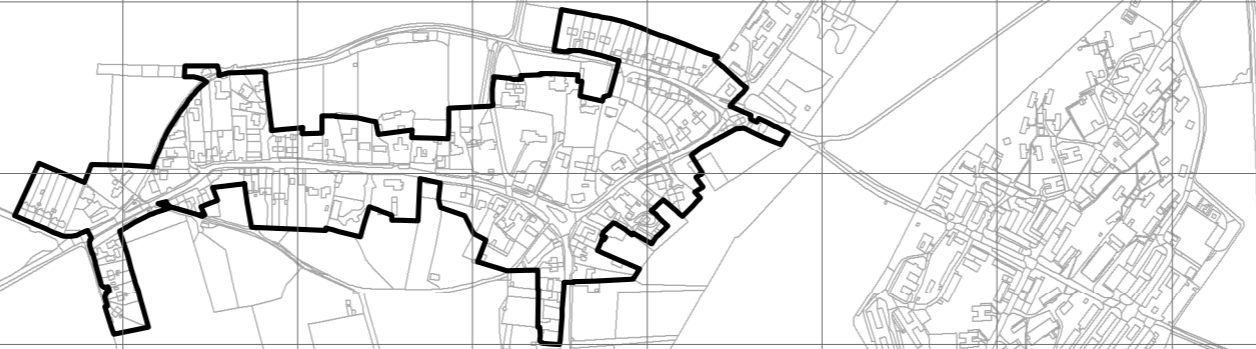
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Tilshead

Page 506



 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

Mere Community Area

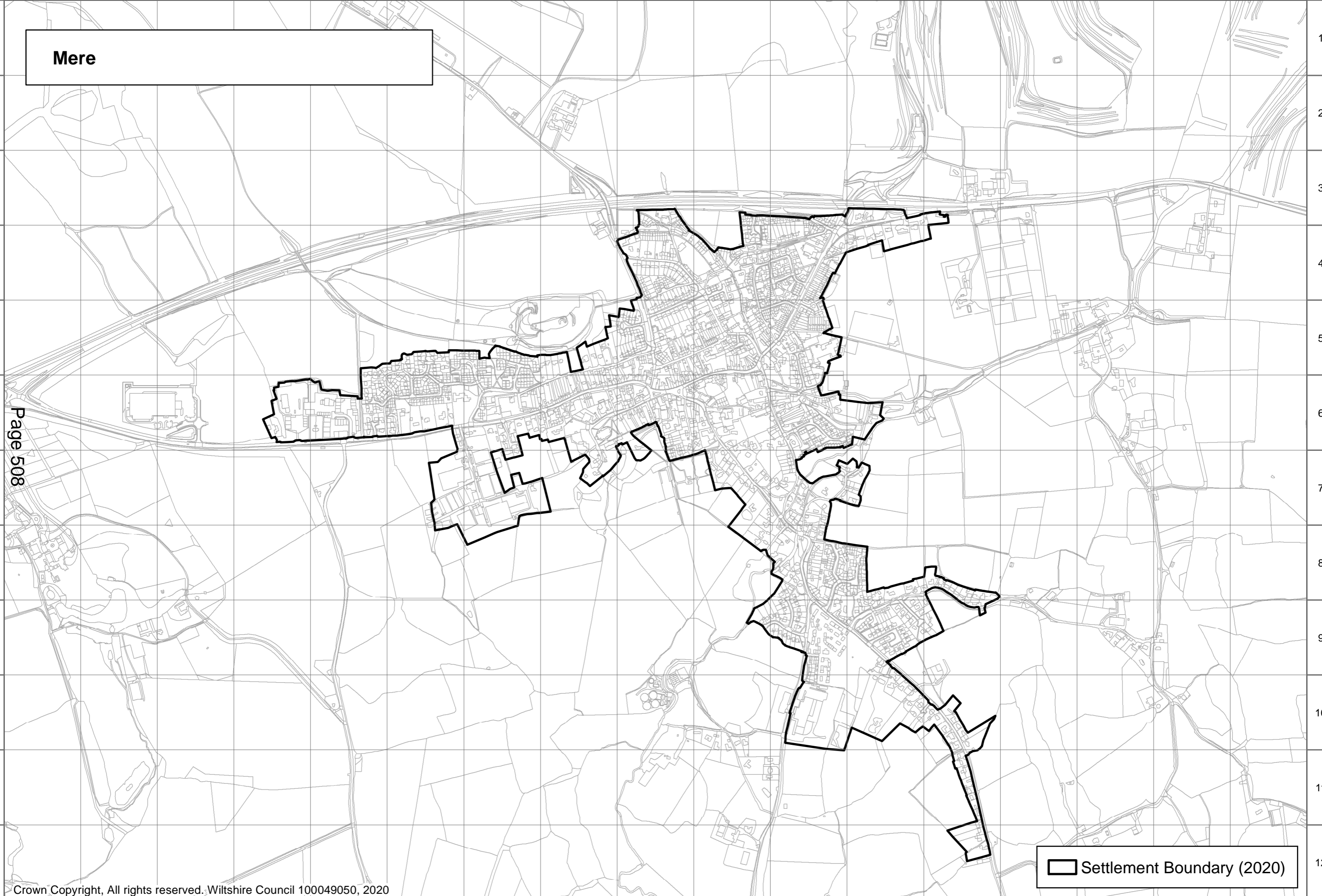
A.87 The following settlement boundaries in the Mere Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Mere


A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

Mere



Page 508

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

Salisbury Community Area

A.89 The following settlement boundaries in the Salisbury Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Salisbury

Salisbury



Page 510

Settlement Boundary (2020)

Southern Wiltshire Community Area

A.91 The following settlement boundaries in the Southern Wiltshire Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Downton
- Alderbury
- Combe Bissett
- Morgan Vale and Woodfalls
- Pitton
- Whiteparish, and
- Winterslow


A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

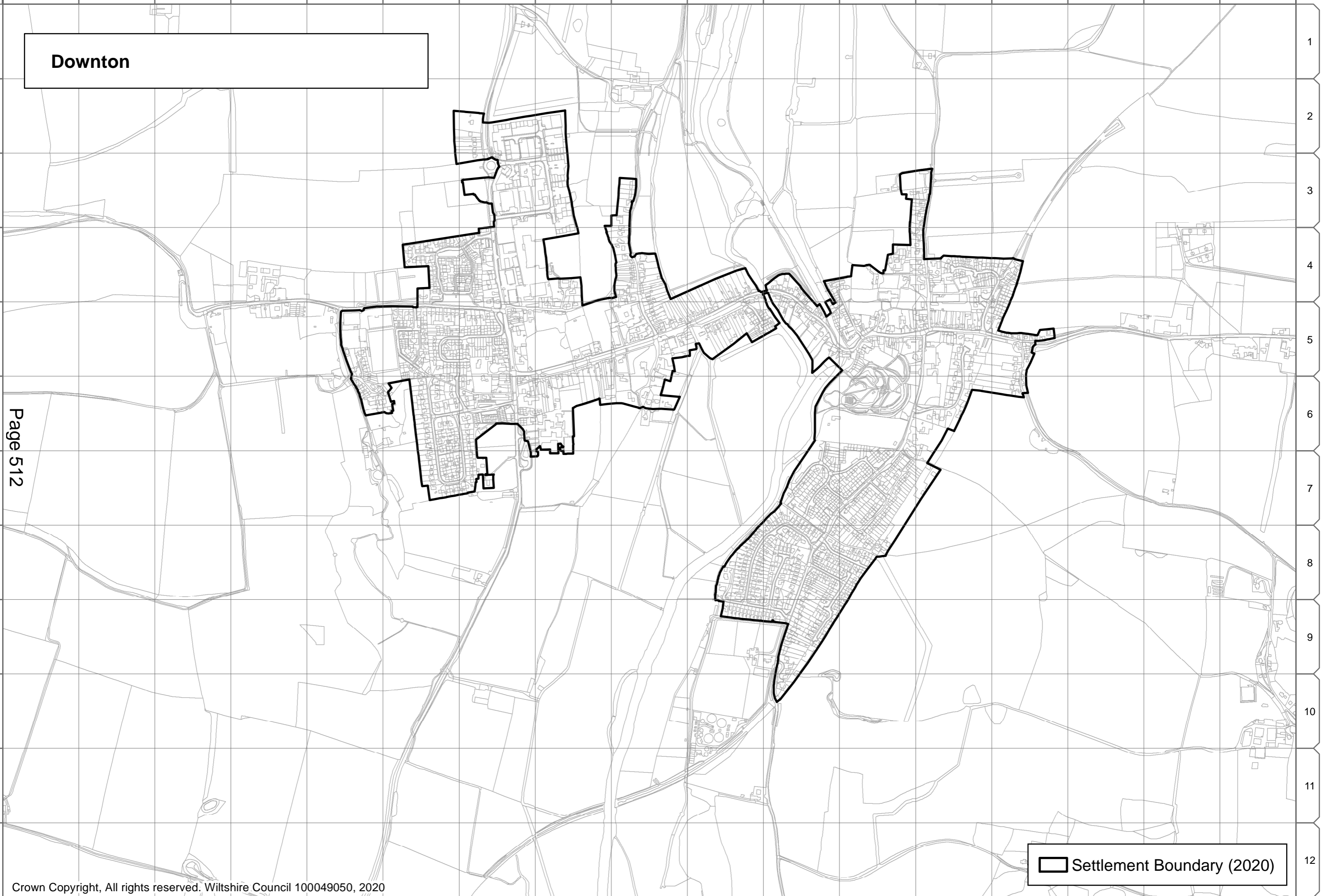
Downton

1
2
3
4
5
6
7
8
9
10
11
12

Page 512

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

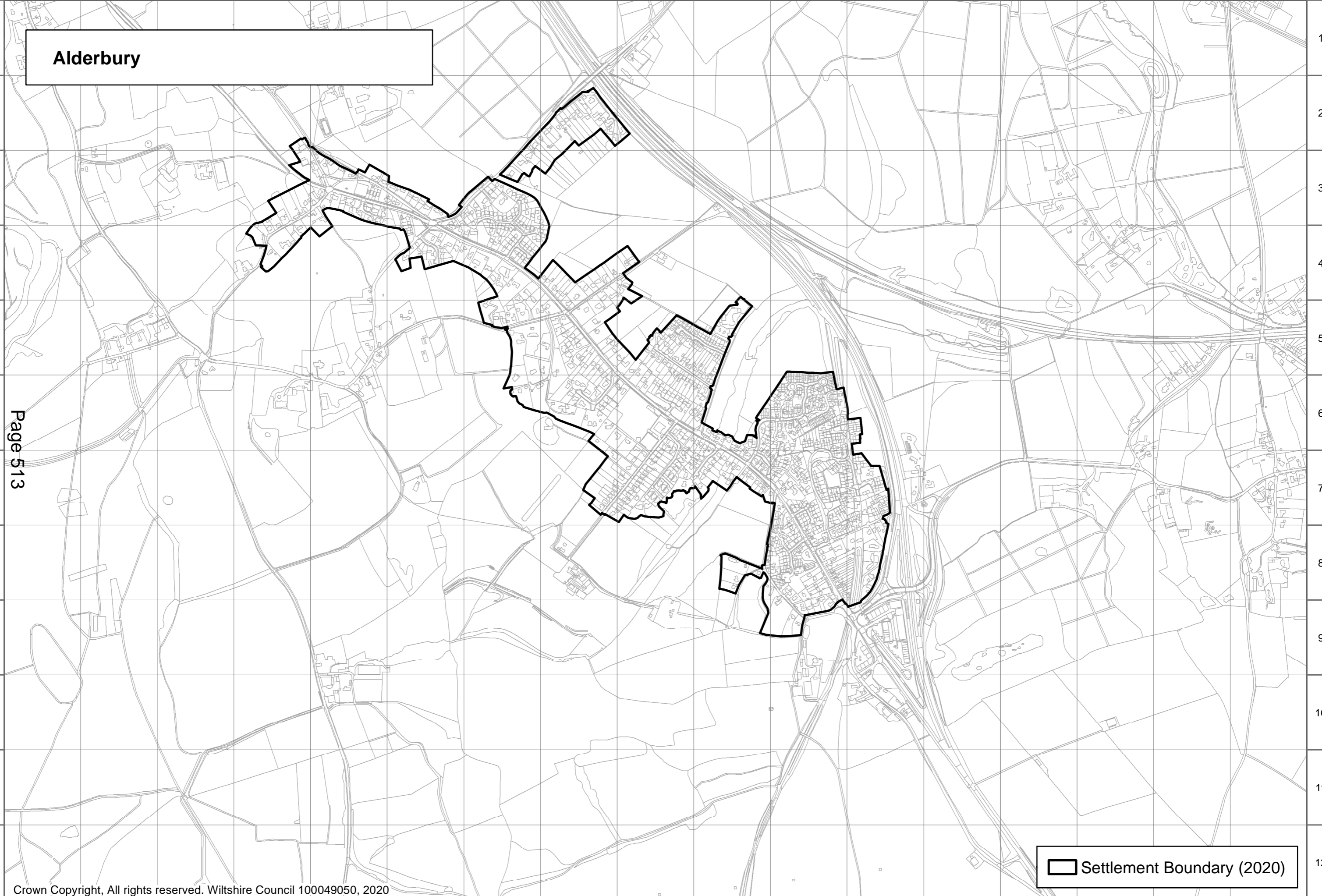


A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Alderbury




Page 513

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

Coombe Bissett

Page 514

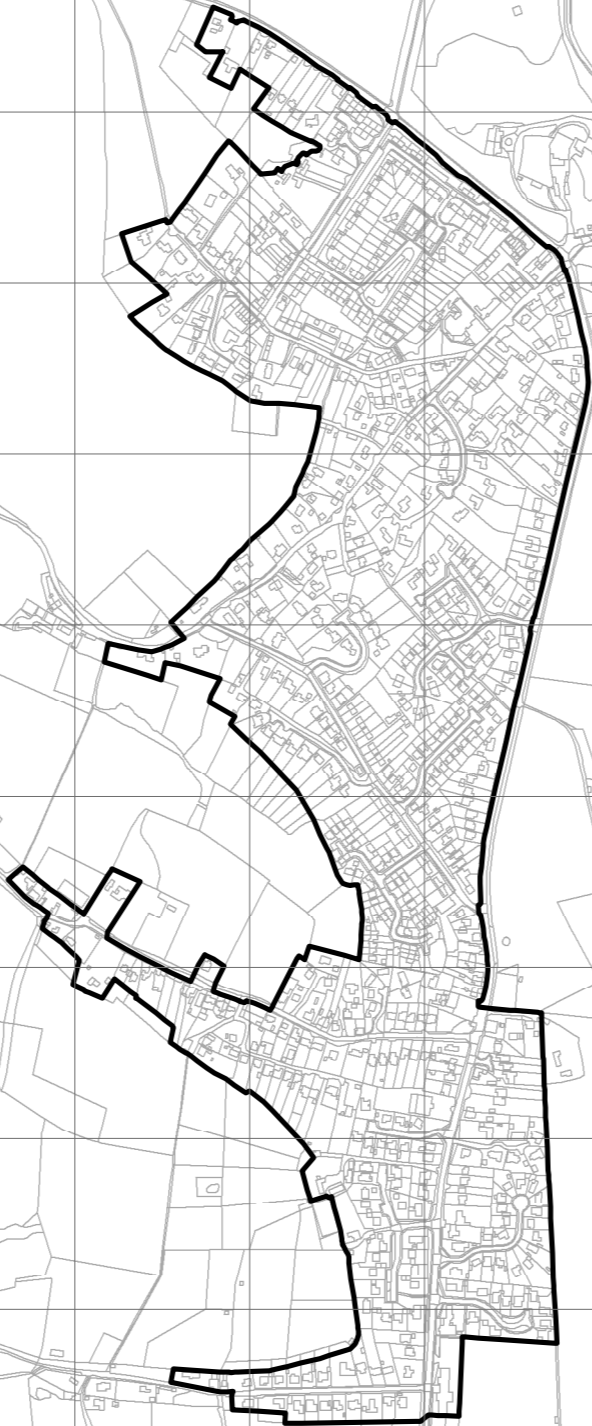
 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

1 2 3 4 5 6 7 8 9 10 11 12

Morgans Vale and Woodfalls

Page 515



□ Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

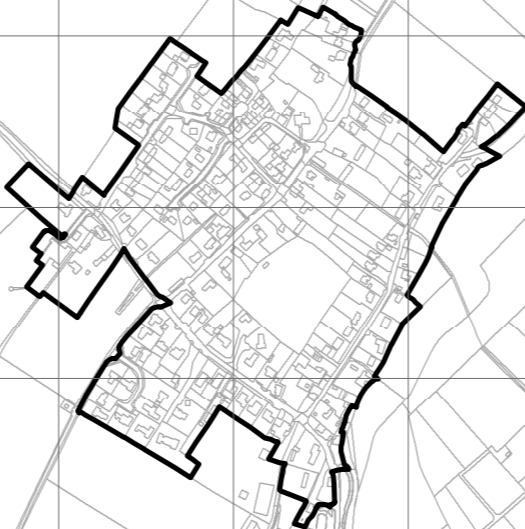
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

Pitton

1
2
3
4
5
6
7
8
9
10
11
12

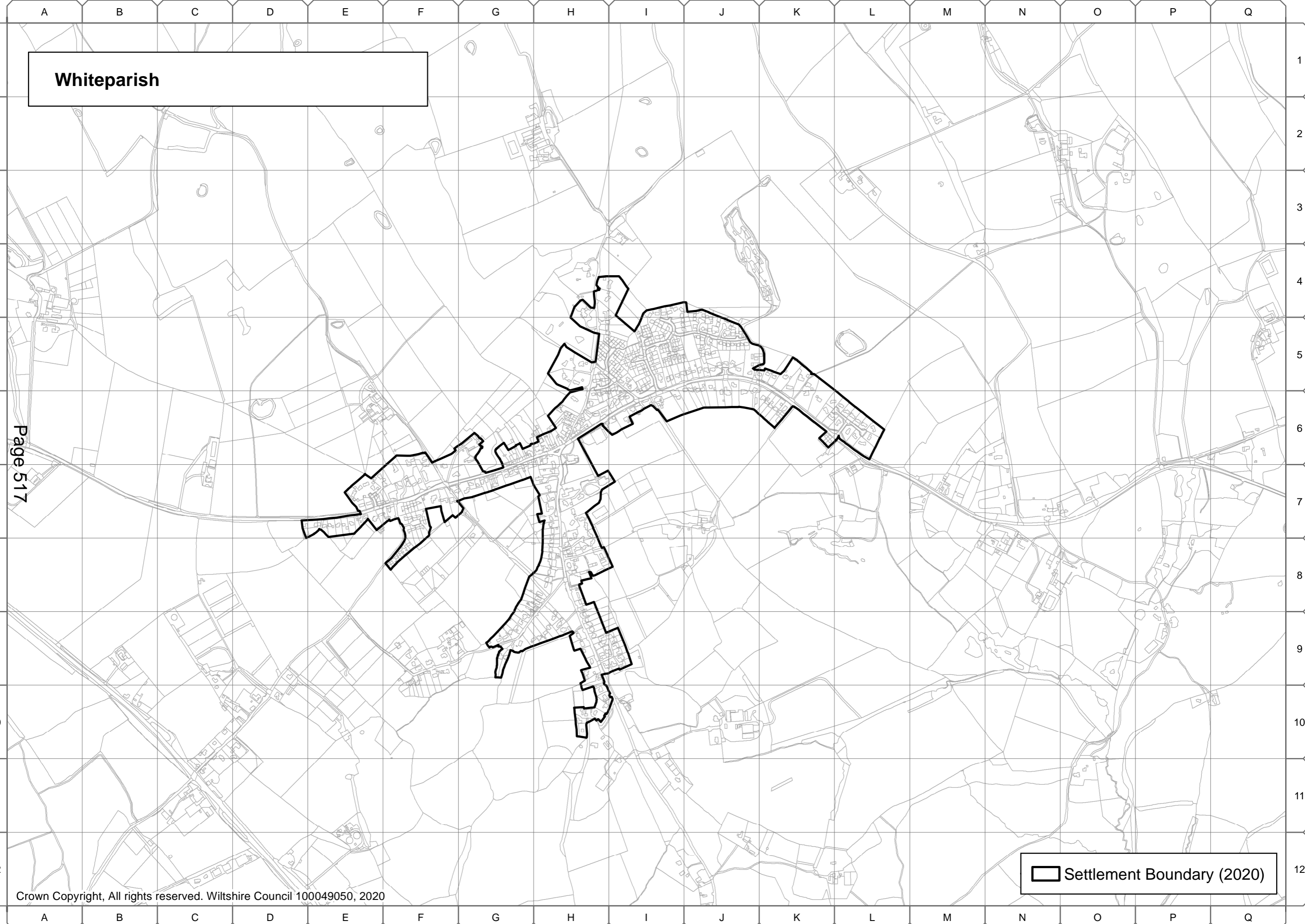
Page 516




 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

Whiteparish



Page 517

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

1
2
3
4
5
6
7
8
9
10
11
12

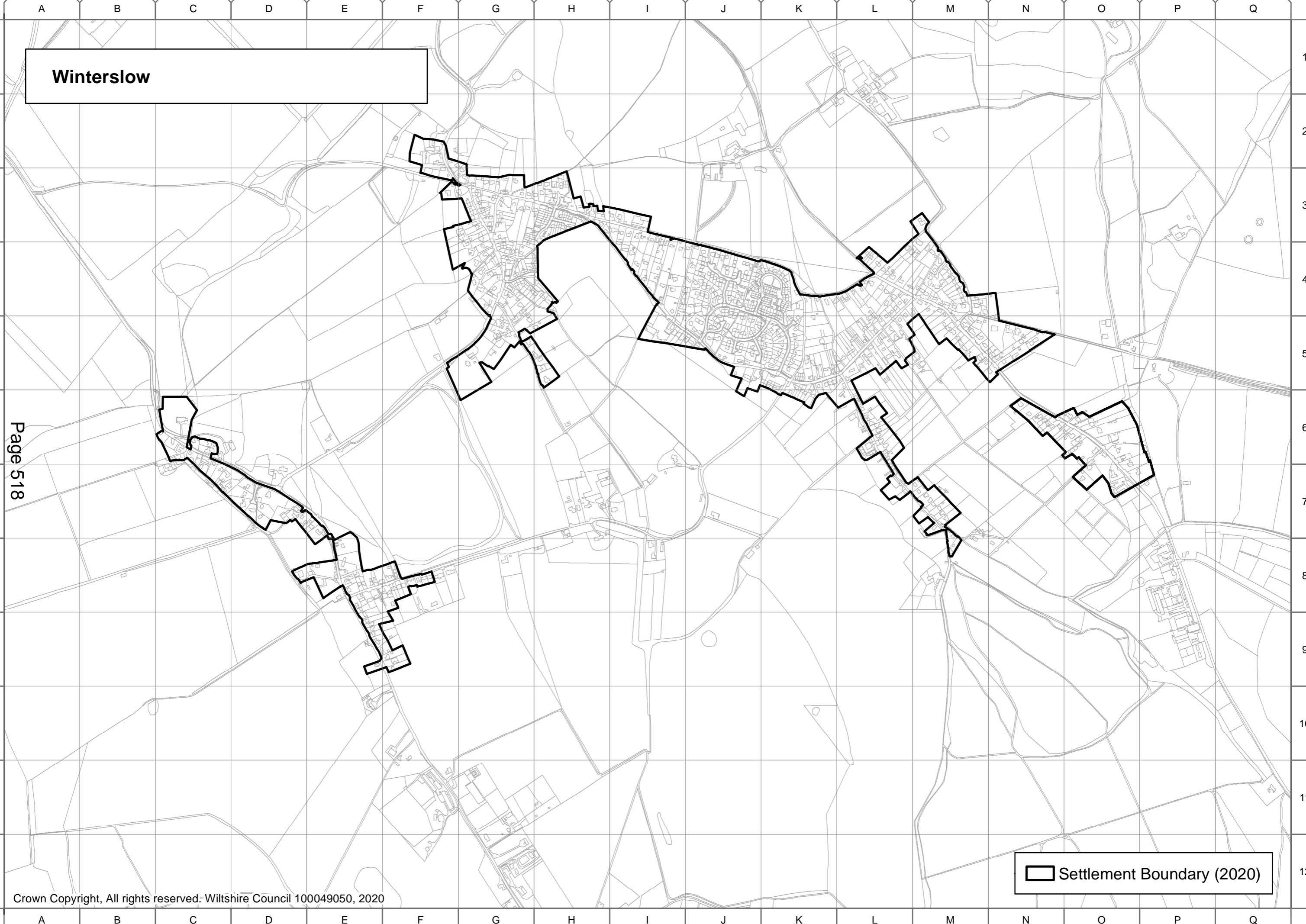
Winterslow

1
2
3
4
5
6
7
8
9
10
11
12

Page 518

A B C D E F G H I J K L M N O P Q

□ Settlement Boundary (2020)



Tisbury Community Area

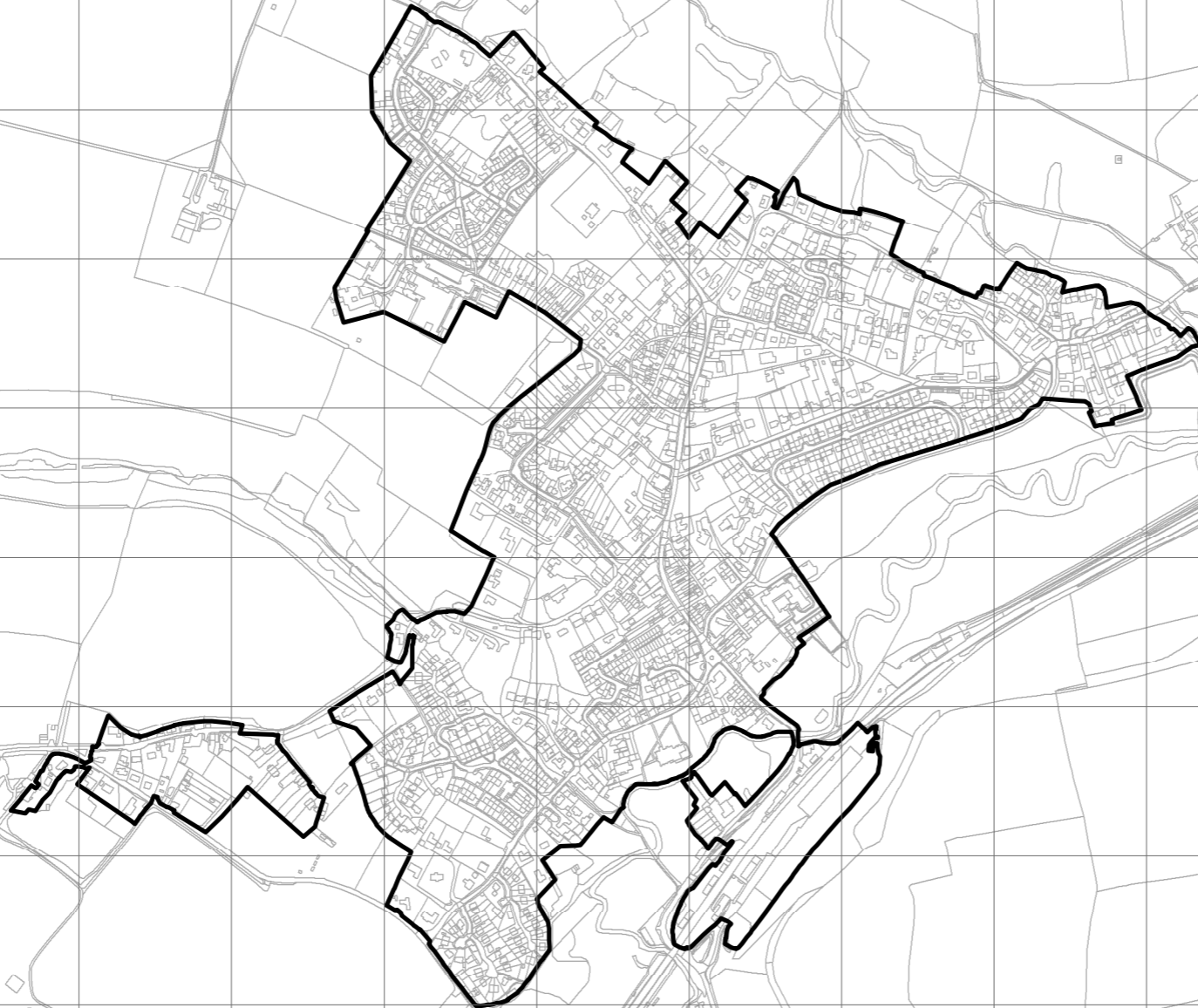
A.99 The following settlement boundaries in the Tisbury Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Tisbury
- Fovant
- Hindon, and
- Ludwell

A B C D E F G H I J K L M N O P Q

1 2 3 4 5 6 7 8 9 10 11 12

Tisbury



Page 520

▭ Settlement Boundary (2020)


A B C D E F G H I J K L M N O P Q

A B C D E F G H I J K L M N O P Q

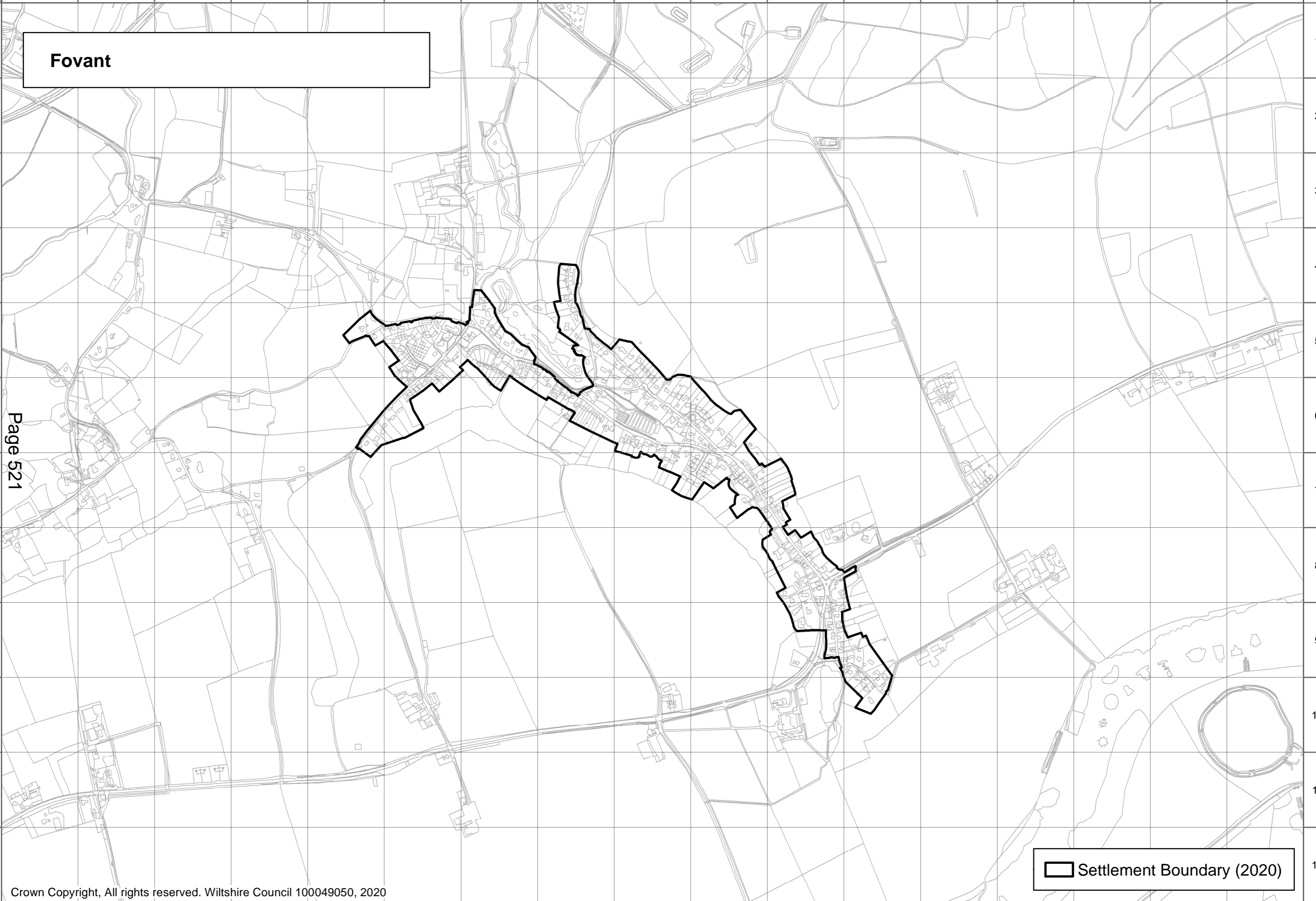
1
2
3
4
5
6
7
8
9
10
11
12

Fovant

Page 521

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q



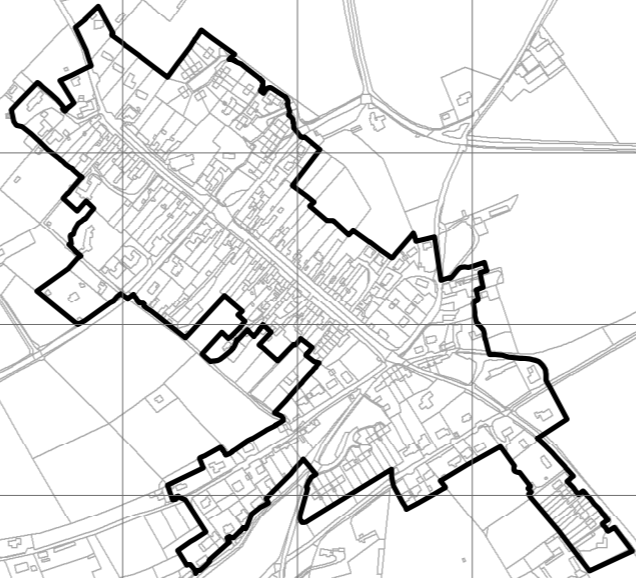
A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

Hindon

1
2
3
4
5
6
7
8
9
10
11
12

Page 522



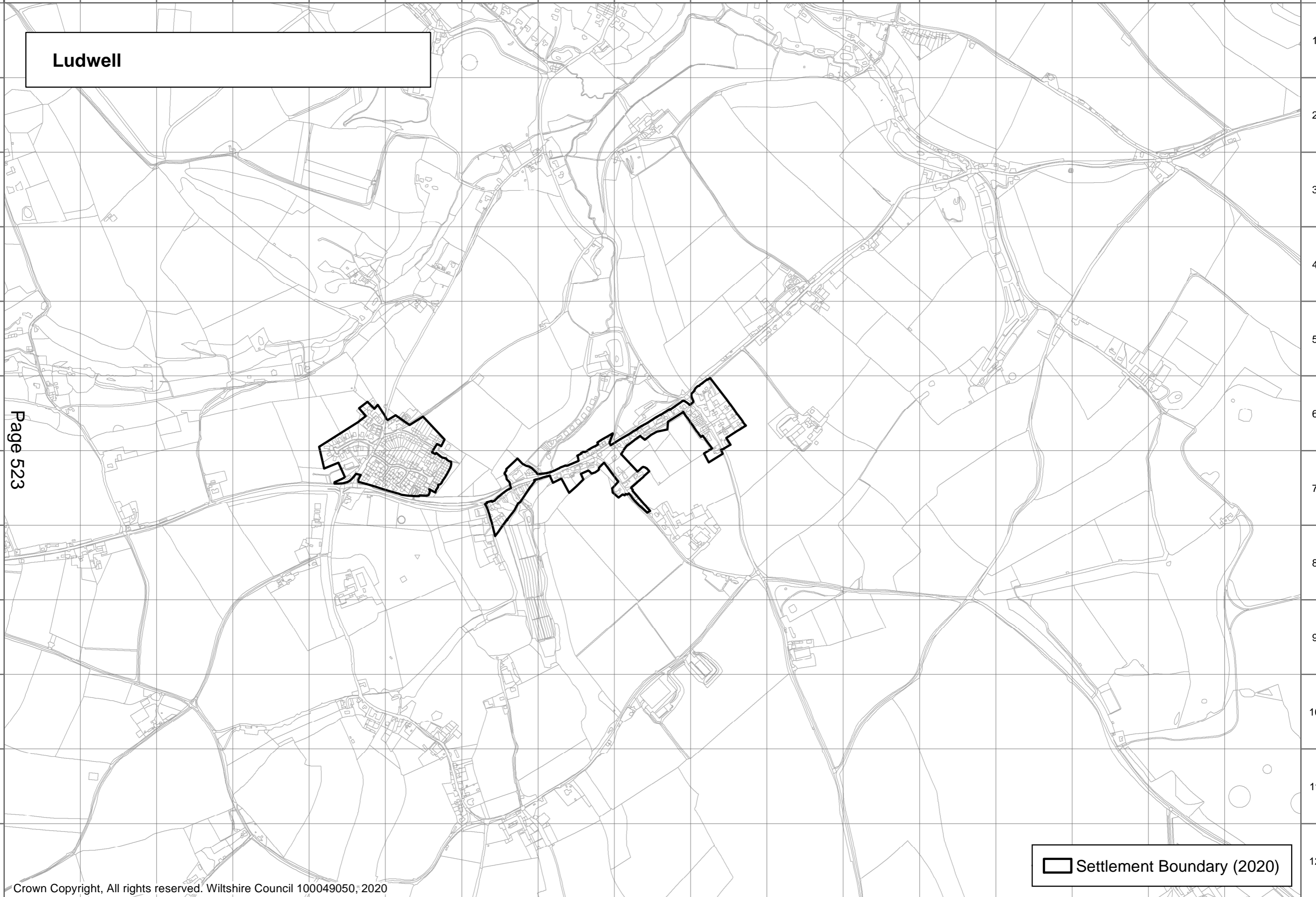
 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q


A B C D E F G H I J K L M N O P Q

1 2 3 4 5 6 7 8 9 10 11 12

Ludwell



Page 523

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

Wilton Community Area

A.104 The following settlement boundaries in the Wilton Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:


- Wilton
- Broad Chalke, and
- Dinton

A B C D E F G H I J K L M N O P Q

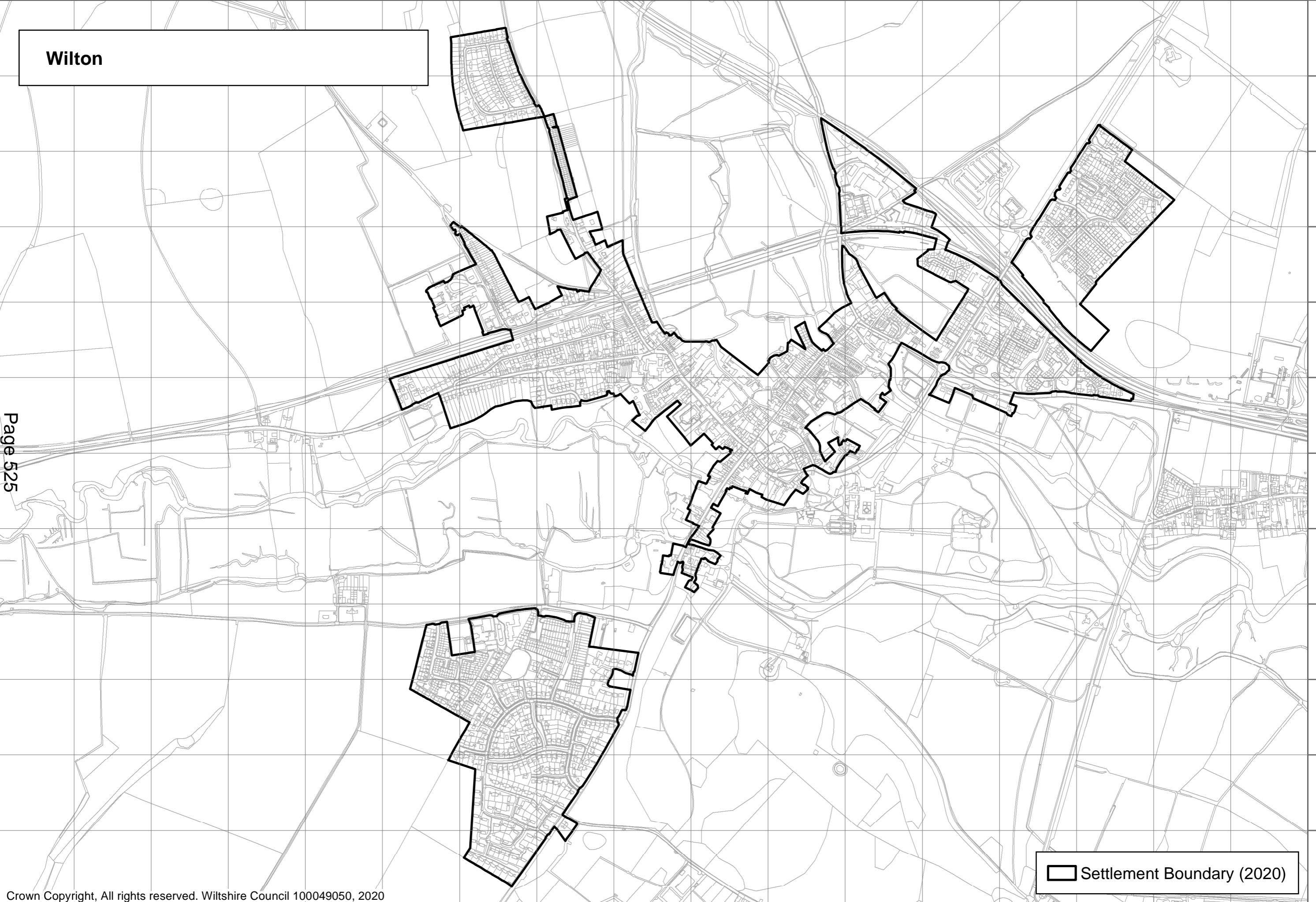
1
2
3
4
5
6
7
8
9
10
11
12

Wilton

Page 525

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

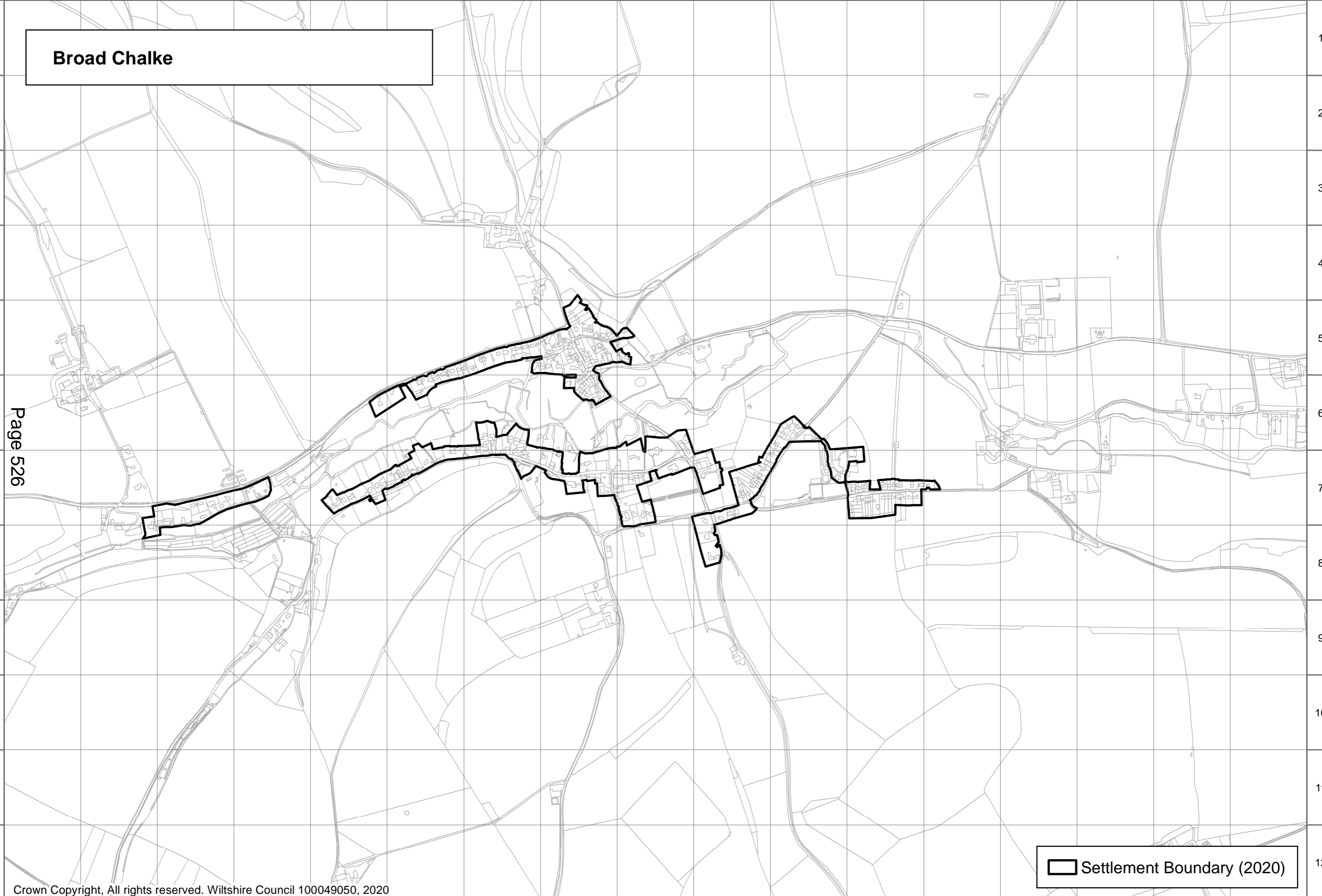


A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Broad Chalke



Page 526

 Settlement Boundary (2020)

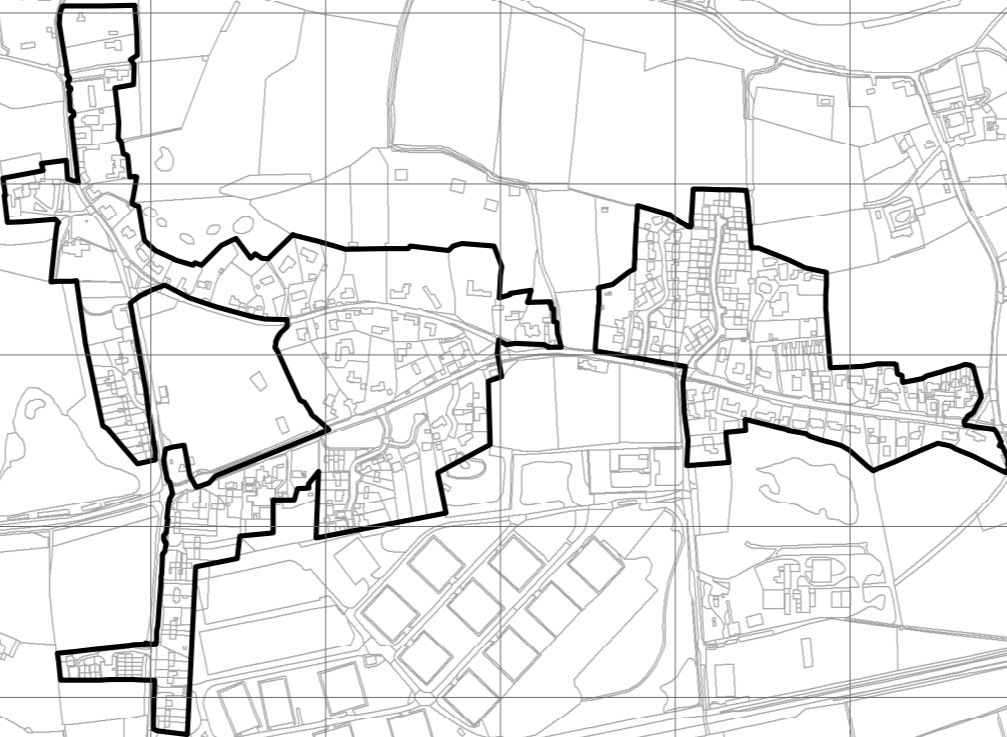
A B C D E F G H I J K L M N O P Q

A B C D E F G H I J K L M N O P Q


1
2
3
4
5
6
7
8
9
10
11
12

1
2
3
4
5
6
7
8
9
10
11
12

Dinton



Page 527

 Settlement Boundary (2020)

A B C D E F G H I J K L M N O P Q

This document was published by the Spatial Planning team, Wiltshire Council, Economic Development and Planning Services.

For further information please visit the following website:

<http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan.htm>

Information about Wiltshire Council services can be made available in other formats (such as large print or audio) and languages on request. Please contact the council on 0300 456 0100, by textphone on (01225) 712500 or by email on customerservices@wiltshire.gov.uk.

Wiltshire Council

Council

25 February 2020

Subject: Trowbridge Bat Mitigation Strategy Supplementary Planning Document

Cabinet Member: Councillor Toby Sturgis, Cabinet Member for Spatial Planning, Development Management and Investment

Key Decision: Key

Executive Summary

The landscape surrounding Trowbridge is known to be of high importance for bats, supporting at least 14 of the 18 UK bat species. This includes all four of the rarer UK species listed in Annex II of the Habitats Directive (European Council, 1992): greater horseshoe, lesser horseshoe, Bechstein's and barbastelle bats.

In particular, the woodlands to the east and south-east of Trowbridge are known to support a large and internationally significant breeding population of Bechstein's bat, linked to the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC).

The overall aim of the Trowbridge Bat Mitigation Strategy (TBMS) is to provide a clear and detailed approach to considering impacts of development around Trowbridge on the Bath and Bradford-on-Avon Bats SAC. This will help inform strategic and local planning for the area's housing needs.

Significant potential effects to the integrity of the SAC include impacts to the foraging areas and commuting routes in the landscape used by bats, as well as their roost sites and can include:

- Habitat degradation;
- Lighting e.g. increased;
- Noise and vibration e.g. construction/demolition activity close to roosts;
- Recreational disturbance e.g. urbanisation, damage to vegetation, dumping of waste, fires and vandalism;
- Pollution e.g. dust and fumes from vehicles; and
- Mortality e.g. predation by cats and collision with vehicles.

Core Policy 29 of the Wiltshire Core Strategy anticipates a significant level of growth at Trowbridge over the period up to 2026, including 2,600 homes coming forward on the allocation at Ashton Park to the south-east of the town. In addition, the Wiltshire Housing Site Allocations Plan has been prepared to support the delivery of housing at the town in line with Core Policy 29.

The TBMS has been prepared as a Supplementary Planning Document (SPD) to provide certainty for developers and local communities in terms of how development and mitigation measures will be guided to ensure the integrity of the SAC and the core bat habitats around the town are protected and enhanced.

At its heart is the delineation of buffer areas around the woodlands and two zones (the red and yellow zones) within which major development will either be resisted, or considered, subject to the delivery of appropriate mitigation measures to address habitat creation and the management of recreational pressure (grey hatched zone).

The preparation of SPDs follows a prescribed process set out in legislation. The TBMS was published for consultation for a 4-week period commencing 21 February 2019. Due process has therefore been followed and thorough consideration of the consultation responses received has been undertaken. All amendments to the draft TBMS have been prepared to address, where practicable, the issues raised through the consultation.

Adopting the TBMS as an SPD will significantly assist in the implementation of the Wiltshire Housing Site Allocations Plan as well as planned residential development at Trowbridge in line with the Wiltshire Core Strategy. Moreover, it will assist local communities plan for housing development through their neighbourhood plans and thereby help guide development around the town.

As an SPD, the guidance set out in the TBMS will be afforded greater weight in the decision-making process. In this regard it will provide greater certainty to the development industry and local communities in terms of how housing at the town will be delivered, whilst helping to ensure the integrity of the Bath and Bradford-on-Avon Bats SAC is appropriately protected and enhanced in line with legislation through the delivery of appropriate mitigation measures.

This report was endorsed by Cabinet at its meeting on 4 February, the report to Cabinet is included below (with updated appendices for Full Council) and the minutes can be viewed [here](#).

Proposal(s)

That Council:

- (i) Notes the response to the consultation on the draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document (the TBMS) set out in the Consultation Statement at **Appendix 1**.
- (ii) Endorses the amended TBMS as set out in **Appendix 2**.
- (iii) Adopts the amended TBMS as a Supplementary Planning Document.

- (iv) Agrees that the Director for Economic Development and Planning in consultation with the Director for Legal, Electoral and Registration Services and the Cabinet Member for Spatial Planning, Development Management and Investment, undertakes the final stages associated with the formal adoption and publication of the TBMS, including any minor textual changes in the interests of clarity and accuracy.

Reason for Proposal(s)

To:

- (i) Ensure that the TBMS is formally adopted as a Supplementary Planning Document (SPD) to assist the implementation of the Wiltshire Housing Site Allocations Plan for development on the housing allocations at Trowbridge, as well as windfall and neighbourhood plan sites in line with the Wiltshire Core Strategy; and
- (ii) Provide guidance to developers on where proposals for housing development would be acceptable and what would constitute acceptable mitigation measures to ensure the integrity of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) is protected and enhanced.

Alistair Cunningham
Chief Executive Officer - Place

Wiltshire Council

Cabinet

4 February 2020

Subject: Adoption of Trowbridge Bat Mitigation Strategy
Supplementary Planning Document

Cabinet Member: Councillor Toby Sturgis Cabinet Member for Spatial
Planning, Development Management and Investment

Key Decision: Key

Purpose of Report

To:

- (i) Provide Cabinet with the response to the consultation on the draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document (TBMS), as set out in the Consultation Statement at **Appendix 1**.
- (ii) Recommend that Cabinet endorses the amended TBMS as set out in **Appendix 2**.
- (iii) Recommends to Council that they formally adopt the amended TBMS as a Supplementary Planning Document (SPD).
- (iv) Subject to approval of Council, agrees that the Director for Economic, Development and Planning in consultation with the Director for Legal, Electoral and Registration Services and the Cabinet Member for Spatial Planning, Development Management and Investment, undertakes the final stages associated with the formal adoption and publication of the TBMS, including any minor textual changes in the interests of clarity and accuracy.

Relevance to the Council's Business Plan

1. The TBMS is fundamentally linked to the implementation of planning policy and the sustainable management of housing growth at Trowbridge. It sets out clear guidance for developers and the local community on how the delivery of new housing at the town can be achieved whilst protecting and enhancing the integrity of the Special Area of Conservation (SAC). It is linked to the following aims of the Business Plan:

Growing the Economy - Balancing the objective of growing the community with protecting the environment.

Strong Communities

Good countryside access and cycling and walking opportunities.

Background

2. The landscape surrounding Trowbridge is known to be of high importance for bats, supporting at least 14 of the 18 UK bat species. This includes all four of the rarer UK species listed in Annex II of the Habitats Directive (European Council, 1992): greater horseshoe, lesser horseshoe, Bechstein's and barbastelle bats.
3. In particular, the woodlands¹ to the east and south-east of Trowbridge are known to support a large and internationally significant breeding population of Bechstein's bat, linked to the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC).
4. The overall aim of the Trowbridge Bat Mitigation Strategy (TBMS) is to provide a clear and detailed approach to considering impacts of development around Trowbridge on the Bath and Bradford-on-Avon Bats SAC. This will help inform strategic and local planning for the area's housing needs.
5. Significant potential effects to the integrity of the SAC include impacts to the foraging areas and commuting routes in the landscape used by bats, as well as their roost sites and can include:
 - Habitat degradation;
 - Lighting e.g. increased;
 - Noise and vibration e.g. construction/demolition activity close to roosts;
 - Recreational disturbance e.g. urbanisation, damage to vegetation, dumping of waste, fires and vandalism;
 - Pollution e.g. dust and fumes from vehicles; and
 - Mortality e.g. predation by cats and collision with vehicles.
6. Core Policy 29 of the Wiltshire Core Strategy (WCS) anticipates a significant level of growth at Trowbridge over the period up to 2026, including 2,600 homes coming forward on the allocation at Ashton Park to the south-east of the town. In addition, the Wiltshire Housing Site Allocations Plan has been prepared to support the delivery of housing at the town in line with Core Policy 29.
7. The TBMS has been prepared as a Supplementary Planning Document (SPD) to provide greater certainty for developers and local communities in terms of how development and mitigation measures will be guided to help to ensure the integrity of the SAC and the core bat habitats around the town are protected and enhanced. At its heart is the delineation of buffer areas around the woodlands and two zones (the red and yellow zones, see Figure 4 Appendix 2) within which major development will either be resisted, or considered, subject to the delivery of appropriate mitigation

¹ Biss Wood, Green Lane Wood and Picket and Clanger Wood

measures to address habitat creation and the management of recreational pressure (grey hatched zone, see Figure 5 Appendix 2).

8. The preparation of SPDs follows a prescribed process set out in legislation. The TBMS was published for consultation for a 4-week period commencing 21 February 2019.

Main Considerations for the Council

9. The National Planning Policy Framework is clear that sustainable development must include a reversal on the net loss of biodiversity. Core Policy 50 of the WCS accords with this principle and in doing so seeks to protect and enhance features of biodiversity and geological value.
10. In the light of national and local planning policy (WCS), the Trowbridge Bat Mitigation Strategy (TBMS) has been prepared to be adopted as a Supplementary Planning Document (SPD) to give it greater weight in the decision-making process. Full regard has therefore been given to the relevant legislative process².
11. The purpose of the TBMS is to provide a clear and detailed approach to establishing mitigation measures in the Trowbridge area to protect the bat species in the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) from recreational pressure and loss of core habitat. It has been primarily prepared to support the allocations set out in the Wiltshire Housing Site Allocations Plan (WHSAP) and thereby helps support the planned delivery of housing established in Core Policy 29 of the WCS.
12. Notwithstanding this primary role, the TBMS has also been prepared to help guide growth at the town. In this regard, it will be utilised to assist the review of the WCS, the preparation of neighbourhood plans in the local area and, as appropriate, decisions on individual planning applications.

Consultation on the draft TBMS

13. Between the 21 February and 21 March 2019, over 800 individuals and organisations were consulted via email, the Council's online consultation portal or by post on the [draft Trowbridge Bat Mitigation Strategy](#). An exhibition was held at County Hall in Trowbridge on 26 and 28 February for members of the public to talk to officers, ask questions and understand how to comment on the strategy. The consultation was also advertised in the local press and on the Wiltshire Council website. The Consultation Report at **Appendix 1** clarifies how the consultation was undertaken and provides a summary of the main issues raised.

Main issues raised through consultation

² The Town and Country Planning (Local Planning) (England) Regulations 2012, Part 5,

14. The strategy is supported by Natural England and several other advisory bodies. The main issues raised during consultation were:
- Natural England would welcome assurances that there will not be a long lag-time between development occurring and mitigation measures being implemented; and that the Bechstein's bat population at Trowbridge is referred to in the strategy.
 - Trowbridge Town Council would like more clearly defined buffer zones, clearer definitions of 'core bat habitat' and terms such as 'wide swathe' of land. In addition, they have called for more clarity as to how the recreational and bat sensitivity zones have been defined.
 - Friends of Southwick Country Park would like a location for Suitable Alternative Natural Greenspace (SANG) to be decided now as they believe the ecological value of Southwick Country Park has been overlooked due to it not yet being designated a Local Nature Reserve (LNR).
 - Ecological consultants and local interest groups, Campaign to Protect Rural England West Wiltshire and The White Horse Alliance, have raised concerns that the strategy is not capable of mitigating indirect or direct adverse effects on bat habitats and hence falls short of addressing the requirements of the Habitats Directive in terms of providing scientific certainty.
 - Developers raised their concerns that the zones pose too many constraints to development in the Trowbridge area and that mitigation may become too costly to deliver.
15. Despite the issues raised, the strategy is welcomed and supported by Natural England, Wiltshire Wildlife Trust, the Wiltshire Bat Group and ecological consultants. Natural England praises the strategy for being proportionate in terms of survey requirements and the approach to on-site and off-site mitigation and is confident the strategy provides a high-level of certainty that development, when considered in terms of cumulative and residual effects, will lead to an improved environment for bats. Wiltshire Wildlife Trust and the Wiltshire Bat Group welcome the strategy, in particular its emphasis on delivering mitigation at a landscape-scale
16. A list of representations can be found in the Consultation Statement (**Appendix 1**). The Statement provides a response to all the main issues raised by individuals and organisations during the consultation. In addition, it describes what changes should be made to the draft TBMS to address, where necessary, the main issues raised.

Response to the consultation and proposed changes to the TBMS

17. In accordance with legislative process³, before the Council can adopt the TBMS as a SPD it must have regard to the main issues raised through the consultation and how such issues have been addressed. As outlined above, these considerations are set out in more detail within the Consultation Statement (**Appendix 1**). A summary of the recommended actions to resolve the main issues raised and how the draft TBMS should be amended is set out below. **Appendix 2** sets out the TBMS as amended in response to the comments.

Natural England

18. To address the issue raised by Natural England about minimising the lag-time between development and mitigation measures being in place, wording should be incorporated into the TBMS to confirm: a) the timescale for appointing the Project Officer; and b) that the Project Officer will liaise with Natural England to secure an acceptable programme of mitigation measures. In addition, the significance of the Bechstein's bat population at Trowbridge should be inserted.

Friends of Southwick Country Park

19. Although a full account of the Country Park's ecological value is outside the scope of the TBMS, a reference should be added to highlight the Park's biodiversity, including its value for important protected SAC bats, as well as the efforts being made by Wiltshire Council to designate it as a Local Nature Reserve.
20. The TBMS should record that where increased recreational pressure at the Country Park is unavoidable, due to the proximity of the closest allocations, developer contributions will be used to ensure this does not generate negative effects to biodiversity in the Country Park.
21. The TBMS has fully considered the potential impacts associated with implementing the housing allocations at Trowbridge set out in the Wiltshire Housing Site Allocations Plan (WHSAP). A costed, 'worst-case scenario for bats' has been provided which gives flexibility for achieving the best overall outcomes in respect of mitigation measures to address recreational pressure and/or enhancements to core bat habitat. The role the Country Park will play in helping support the objectives of the TBMS will be further investigated and refined when the Project Officer is in post.

Trowbridge Town Council

22. In response to Trowbridge Town Council's concerns over the clarity of definitions, further explanation of key terms should be strengthened to improve its precision e.g. terms such as: 'core bat habitat' should be defined.

³ The Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 12

23. Figure 6 (core bat habitat features and associated buffer zone) should be reviewed and clarified to overcome ambiguities and provide greater precision for the user of the TBMS. The grey hatched recreational sensitivity zone is based on the distance people are prepared to travel to reach woodlands, while the yellow and red buffer zones are based on bat records and scientific research. While the evidence underpinning the buffer zones is considered to be robust, it is difficult to precisely monitor Bechstein's bats and therefore the Council has taken a precautionary approach to ensure that less frequent, but equally important migration routes are captured.
24. It is acknowledged that further clarification of what is required by different types of planning application is needed within the TBMS. To address this a new sub-section should be added to summarise the submission requirements for planning. This includes a table which identifies the requirements for Outline, Full, Reserved Matters and Householder applications.

Development industry

25. The development industry was primarily concerned with the perceived level of restriction to development that the TBMS would introduce if implemented. This is a matter that was debated during the examination hearing sessions for the WHSAP. Although the TBMS, as a proposed SPD, could not be formally examined by the Inspector, he nonetheless concluded in his report (which is the subject of a separate Agenda item) that the TBMS has been prepared in a robust manner with full regard to legislative provisions and the necessary input of Natural England. In these regards, the Inspector was satisfied that the relationship between the WHSAP and the TBMS is important in ensuring the housing allocations at Trowbridge are implemented with full regard to the protection of bats and core bat habitats.
26. Whilst the views of the development industry in terms of restrictions to growth are noted, the legal framework (The Habitats Regulations), national planning policy (NPPF) and local planning policy (the WCS and WHSAP) are significant considerations that have underpinned the preparation of the TBMS.
27. Having considered all representations, it is considered that the TBMS sets out a robust, reasonable and sufficient level of mitigation necessary to enable further development at Trowbridge to proceed without contravening the Habitats Regulations. This position is supported by Natural England. The TBMS also aims to increase availability of access and recreation for the town.
28. The Ashton Park WCS allocation was a recurring issue in regard to its inclusion or exclusion from certain parts of the TBMS sensitivity zones. Consultees raised the point that it should be included in some maps to show its boundary in relation to the zones and other local core bat habitat. However, it is then also pointed out that it should be removed from some tables and an explanation given as to why.

29. Clarity should therefore be provided in the TBMS confirming that no further mitigation measures are required to support the Ashton Park proposals in view of the specific, detailed and approved mitigation strategy plan for the site. In addition, greater emphasis should be provided to highlight the policies set out in the WHSAP covering the allocations at Trowbridge and the mitigation measures that will be required.
30. Figures 4 (Bat Habitat Sensitivity Zones) and 5 (Bat Recreational Sensitivity Zones), should therefore be altered to reflect the fact that the TBMS does not need to set out mitigation measures for Ashton Park as this scheme has its own bespoke mitigation arrangements.

Ecological consultants and local interest groups

31. Concerns raised regarding the effectiveness and deliverability of the mitigation measures set out with the WHSAP and TBMS have been fully considered. It is considered that, and Natural England agrees, the WHSAP will be delivered effectively and therefore avoid harmful impacts to bats and core bat habitat. Again, this is a point that was discussed through the examination of the WHSAP and the Inspector is satisfied that the Plan, as amended by his Main Modifications ensures this important principle will be delivered.
32. Moreover, a number of consultation responses supported the view that the WHSAP is both effective and proportionate in its treatment of necessary mitigation. The Plan takes a precautionary approach (i.e. assumes all habitat lost is used by SAC bats and directs development to lower risk zones). The mitigation measures, such as including appropriate buffers and 100% habitat loss mitigation, have been established in the TBMS and will be used to help inform the preparation of detailed planning applications covering the allocated sites at Trowbridge. This will ensure that negative effects/impacts associated with development are robustly minimised. It is considered that these measures are sufficient to address issues raised by ecological consultants, local interest groups and members of the public about the achievability of the strategy.
33. Detailed concerns regarding hedgerow legislation have been fully considered. The Council's position regarding hedgerows is that the breaching of certain hedgerows may well be unavoidable. Indeed, such works are not prohibited by legislation. However, mitigation will need to ensure that across development sites as a whole, habitat continuity is maintained. In-combination impacts will be mitigated offsite through Section 106 contributions in line with the TBMS.
34. In summary, it is considered that the consultation responses received in respect of the TBMS have been appropriately and fully addressed. The proposed amendments that are set out in the Consultation Statement (**Appendix 1**) and incorporated into the final draft of the Strategy (**Appendix 2**) are reasonable and reflective of the comments received. In this regard, the Strategy has been strengthened to provide greater clarity and precision. In reviewing the TBMS, other additional minor changes

have also been made in the interest of clarity and accuracy but do not alter the overall substance of the document consulted on.

Overview and Scrutiny Engagement

35. There has been no overview and scrutiny engagement throughout the preparation of the TBMS.

Safeguarding Implications

36. There are no safeguarding implications arising from the proposal.

Public Health Implications

37. The TBMS sets out robust guidance for developers on how housing development at Trowbridge can protect and enhance the integrity of the Bath and Bradford-on-Avon Bats SAC. In this regard, it advises that development proposals should be sensitively planned in locations that reduce pressure on the key woodland habitat sites to the south-east of the town, whilst providing new habitat and areas of open space. Such measures will assist in the delivery of new recreation opportunities, increased habitat and green infrastructure connectivity, as well as new walking and cycling routes away from the core woodland bat habitats.

Procurement Implications

38. It is considered that there are no procurement implications associated with the proposal.

Equalities Impact of the Proposal

39. The consultation process was undertaken in accordance with the Council's Statement of Community Involvement and legislative procedures. The Council engaged widely with Natural England, Trowbridge Town Council, local bat experts, general public and the development industry. Therefore sufficient opportunity has been provided for all those with an interest in the TBMS to provide comments and help shape its final form as a SPD.

Environmental and Climate Change Considerations

40. At the heart of the Council's planning policy framework is the objective of delivering sustainable development that addresses and adapts to the predicted effects of climate change. The policies of the WCS and WHSAP embody this requirement and have accordingly been found sound through independent examination on such matters.
41. The TBMS has been prepared to assist with the implementation of Wiltshire Housing Site Allocations Plan and Wiltshire Core Strategy. In this regard, it helps guide the design and delivery of mitigation measures to ensure the qualifying features of the Bath and Bradford-on-Avon Bats

Special Area of Conservation are robustly protected in line legislative provisions, as well as national and local planning policy.

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

42. If the TBMS SPD is not adopted, the principle risk will be that planned growth at Trowbridge fails to appropriately address the requirements of legislative processes associated with the Habitats Directive and this would likely impact upon these development sites coming forward in the Trowbridge area.

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

43. None identified.

Financial Implications

44. The financial implications of adopting and publishing the TBMS will need to be met from existing budget allocations for Economic Development and Planning and will be limited.
45. Implementing the TBMS will rely upon prioritising the use of Community Infrastructure Levy for the delivery of recreational mitigation. This possibility was reported to Cabinet on 11 October 2018, when provision was made to direct CIL funding towards such projects. Appendix 2 of the TBMS costs recreation mitigation at around £1.35m, which includes provision for an officer to deliver the mitigation.

Legal Implications

46. In accordance with Part 5, Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012, before a local planning authority can adopt an SPD (or revisions to one) it must consult for not less than four weeks and then prepare a Consultation Statement setting out who was consulted, a summary of the main issues and how they have been addressed in the SPD.
47. The TBMS has been prepared in compliance with legislative requirements and the amendments tabled for consideration respond appropriately and effectively to the consultation responses received.
48. As soon as reasonably practicable after the local planning authority adopt a SPD they must:
 - (a) Make available in accordance with Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, by publishing on their website and making available for inspection at their principal offices and other places within their area as the local planning authority consider appropriate (e.g. all council libraries and main office hubs) during normal office hours, the:

- (i) SPD; and
 - (ii) an adoption statement, which includes the date on which the SPD was adopted and, pursuant to Section 23(1) of the Planning and Compulsory Purchase Act 2004, any modifications made since the draft supplementary planning document was subject to consultation, and
 - (b) Send a copy of the adoption statement to any person who has asked to be notified of the adoption of the supplementary planning document
49. Any person with sufficient interest in the decision to adopt the supplementary planning document may apply to the High Court for permission to apply for judicial review of that decision, and that any such application must be made promptly, and in any event not later than three months after the date on which the supplementary planning document was adopted.

Workforce Implications

50. There is sufficient workforce in place to finalise the adoption of the TBMS. See financial implications above also.

Options Considered

51. The options considered are:
- (i) To adopt the Trowbridge Bat Mitigation Strategy (TBMS), as proposed to be amended in response to the consultation, as a SPD to support the implementation of the Wiltshire Core Strategy and Wiltshire Housing Site Allocations Plan; or
 - (ii) Not adopt the TBMS.
52. Having considered all matters, including: due process, consultation support from a number of critical stakeholders e.g. Natural England, the value of the TBMS in helping guide development around Trowbridge and the findings of the Inspector who examined the WHSAP, it is clear that proceeding to adopt the TBMS represents the most logical option.

Conclusions

53. Adopting the TBMS as a SPD will significantly assist in the implementation of the Wiltshire Housing Site Allocations Plan as well as planned residential development at Trowbridge in accordance with the WCS. Moreover, it will assist local communities plan for housing development through neighbourhood plans and thereby helping guide development around the town.
54. As an SPD, the guidance set out in the TBMS will be afforded greater weight in the decision-making process. In this regard it will provide certainty to the development industry and local communities in terms of

how housing at the town will be delivered, whilst ensuring the integrity of the Bath and Bradford-on-Avon Bats SAC is appropriately protected and enhanced in line with legislation through the delivery of appropriate mitigation measures.

Sam Fox (Director - Economic Development and Planning)

Report Authors:

Geoff Winslow
Spatial Planning Manager
geoff.winslow@wiltshire.gov.uk
Tel: 01225 713414

Georgina Clampitt-Dix
Head of Spatial Planning
georgina.clampitt-dix@wiltshire.gov.uk
Tel: 01225 713472

Date of report: January 2020

Appendices

Appendix 1: Draft Trowbridge Bat Mitigation Consultation Statement (Updated Full Council version)

Appendix 2: The Trowbridge Bat Mitigation Strategy - Adoption Draft (Updated Full Council version)

Background Papers

The following documents have been relied on in the preparation of this report:

[Trowbridge Bat Mitigation Strategy Supplementary Planning Document - Draft for Consultation \(February 2019\)](#)

Appendix 1

Council Paper

**Consultation Statement on the
Trowbridge Bat Mitigation Strategy
Supplementary Planning Document
(Draft for consultation, February 2019)**

January 2020

Contents

1. Overview of the preparation of the Trowbridge Bat Mitigation Strategy Supplementary Planning Document	4
3. Consultation Methodology	5
3. Representations	7
4. Draft Trowbridge Bat Mitigation Strategy - Supplementary Planning Document - summary of main issues raised through representations.....	8
5. Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document – Proposed changes from 2019 consultation	12
Appendix A - List of Consultation Responses	23
Appendix B – Press advert and insertion into the Town and Parish Newsletter	69
Appendix C - Letter sent by email or post	70
Appendix D - Wiltshire Council Website	72

1. Overview of the preparation of the Trowbridge Bat Mitigation Strategy Supplementary Planning Document

- 1.1. Between 21 February and 21 March 2019, the Council consulted on the [‘Trowbridge Bat Mitigation Strategy Supplementary Planning Document - Draft for Consultation February 2019’](#).
- 1.2. Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for preparing a Supplementary Planning Document (SPD). Regulation 12 requires the Council to prepare a statement setting out who was consulted, a summary of the main issues they raised and how those issues have been addressed in the final SPD.
- 1.3. The Council has therefore produced this ‘Consultation Statement’, to set out:
 - The consultation methodology;
 - The representations received on the consultation draft Trowbridge Bat Mitigation Strategy (TBMS) SPD;
 - A summary of the main issues from the consultation; and how
 - A statement setting out how the main issues have been addressed by the Council.

Structure of this document

- 1.4. Chapter 3 lists the various ways by which the Council consulted upon the draft TBMS SPD.
- 1.5. Chapter 4 provides a breakdown of the number of representations received.
- 1.6. Chapter 5 summarises the main issues arising from the representations along with the Council’s response and proposed actions where necessary.
- 1.7. Chapter 6 provides the overview of the schedule of changes to be made to the draft TBMS and the next steps.
- 1.8. Appendix A provides a list of submitted representations.
- 1.9. Appendices B - D contains the consultation adverts and notices used for the consultation.

3. Consultation Methodology

2.1. The Council undertook consultation in line with its Statement of Community Involvement (July 2015)¹ and Regulation 12 of the Town and County Planning (Local Planning) (England) Regulations 2012. The Council advertised the draft Trowbridge Bat Mitigation Strategy – Supplementary Planning Document (TBMS SPD) and made it available for comment as follows:

- An advert was published in the local newspapers (i.e. The Wiltshire Times) that circulate in the area affected by the draft TBMS SPD (published week commencing 18 February 2019). A copy of which is in **Appendix B**.
- An article was placed in the town and parish newsletter (week commencing 14th February 2019). A copy of which is in **Appendix B**.
- Targeted (email/letter) notifications were sent to relevant town and parish councils, neighbouring planning authorities, landowners, infrastructure providers, statutory bodies and other advisory bodies, voluntary organisations and local interest groups. This letter is contained in **Appendix C**.
- Information was published on the planning policy page of Wiltshire Council's website² to direct consultees to the consultation portal where documents could be viewed and comments could be submitted. This webpage is contained in **Appendix D**.
- There was an exhibition in the Atrium of County Hall, Trowbridge on the 26th February and the 28th February 2019 for members of the public or stakeholders who wished to learn more about the draft TBMS SPD and thereby provide an opportunity for questions to be asked as well as how to submit comments.
- Comments were accepted by post, email and online via the Council's consultation portal.

2.2. The following consultation materials were provided:

- A draft of the 'Trowbridge Bat Mitigation Strategy Supplementary Planning Document - Draft for Consultation, February 2019'.
- Representation Form and guidance note (Word Version).
- A final version of the Trowbridge Recreation Strategy and Visitor Surveys (November 2018)³.

2.3. The consultation exercise undertaken by the Council has provided meaningful engagement with what the Regulations and Wiltshire's SCI define as 'specific' and 'general consultation' bodies in accordance with the guidance set out in the

¹ Wiltshire Statement of Community involvement can be found on the following link:
<http://www.wiltshire.gov.uk/statementofcommunityinvolvement.htm>

²

https://wiltshire.objective.co.uk/portal/spatial_planning/spds/trowbridge_bat_mitigation_strategy_spd/the_trowbridge_bat_mitigation_strategy_spd

³ <https://wiltshire.objective.co.uk/file/5282201>

National Planning Policy Framework (NPPF)⁴ and the Planning Practice Guidance (PPG)⁵. This has included the 'prescribed bodies' and neighbouring local planning authorities, as required by the general duty to cooperate requirement.

4

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁵ <https://www.gov.uk/government/collections/planning-practice-guidance>

3. Representations

- 3.1. The Council contacted 828 consultees for comment overall. Of those consultees 649 were contacted by email and 122 by post. A copy of the letter / email sent to consultees can be found in **Appendix D**. In all, the council received representations from 37 different individuals or organisations.
- 3.2. Figure 3.1 illustrates the breakdown of type of respondent from the 37 representations. As the figure shows, the majority of respondents were the general public and landowners and developers. Trowbridge Town Council, statutory bodies and advisory bodies, local interest organisations, consultants and infrastructure providers also submitted representations.

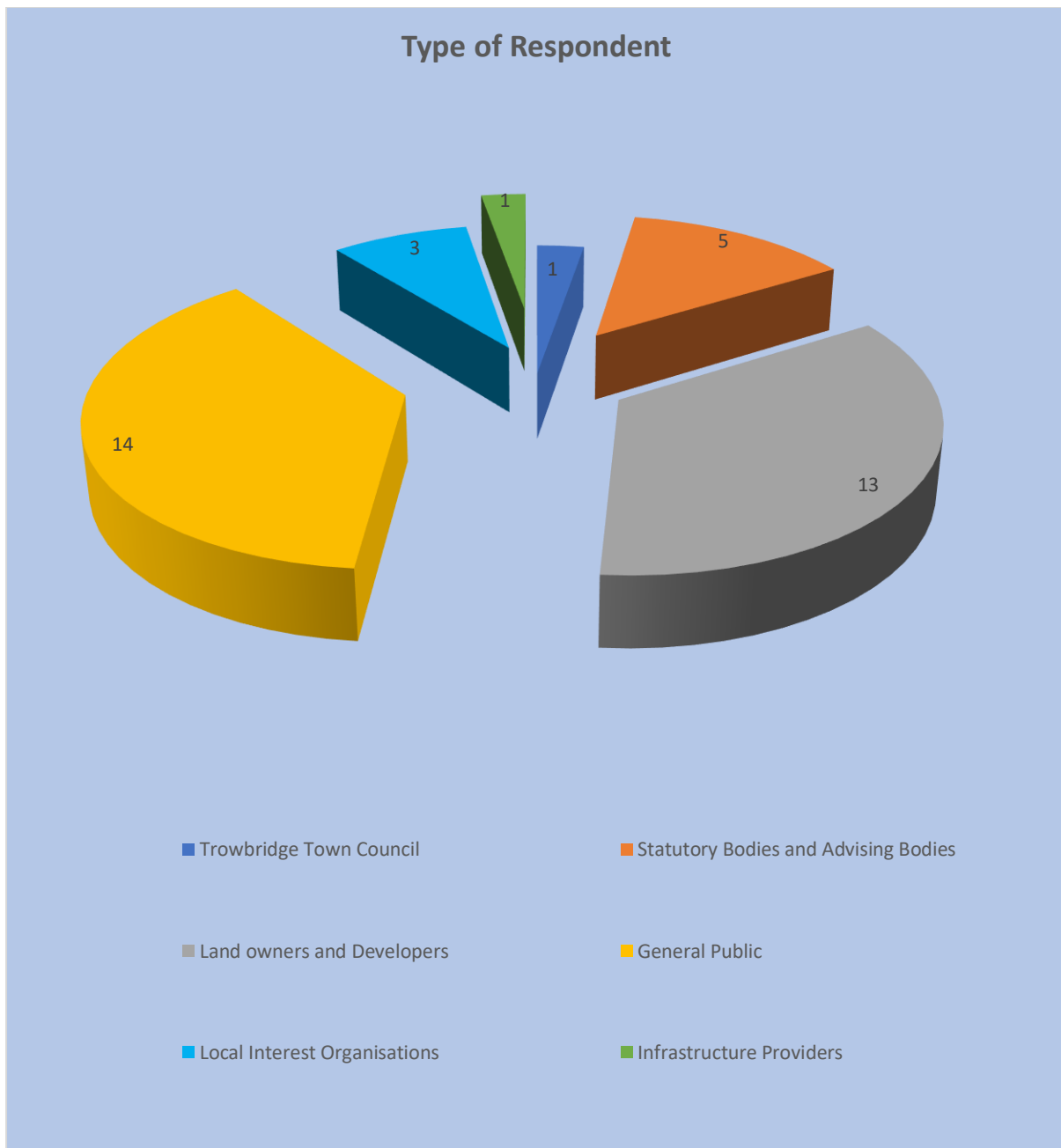


Figure 3.1. Number of representations by category of respondent

4. Draft Trowbridge Bat Mitigation Strategy - Supplementary Planning Document - summary of main issues raised through representations

- 4.1. The following section summarises the main issues raised by those who submitted representations. Each of the main issues raised has been considered in detail and a response provided that has informed how the draft TBMS SPD has been amended. Issues raised by Natural England, Trowbridge Town Council and Friends of Southwick County Park, landowners, developers and statutory bodies and other advisory bodies have been summarised. However, a full summary of responses received can be found in **Appendix A**.

Natural England

- 4.2. Natural England's overall position is that they support the TBMS. They consider it to be proportionate, in terms of survey requirements and the approach to on-site and off-site mitigation. Moreover, they are confident that the Strategy ensures a high level of certainty that development, when considered in combination, will not lead to a poorer habitat for bats.
- 4.3. However, Natural England would welcome assurances that there will not be a long lag-time between development occurring and mitigation being implemented. It also advises a factual amendment to confirm the Bechstein's bat population at Trowbridge is one of the largest in the UK.

The Council's Response

- 4.4. To address the issue raised by Natural England about minimising the lag between development and mitigation being in place, wording has been incorporated into the TBMS to confirm the timescale for appointing the Project Officer to administer the funds received through planning permissions. This officer will liaise with Natural England to secure an acceptable programme of mitigation measures. will be appointed and that the officer will agree implementation milestones with Natural England. The illustrative plan should also be amended to reflect the size of the Bechstein's population at Trowbridge.

Friends of Southwick Country Park

- 4.5. Friends of Southwick Country Park (FSCP) expressed concern that the increased recreational use of the Park will have a negative effect on its ecological value and that the sites value for Bechstein's bats will be degraded which is contrary to the Habitats Directive. The County Park is not yet designated as a Local Nature Reserve (LNR) because the process is still ongoing. As a result, FSCP and other consultees believe that its ecological importance has been overlooked in the TBMS.
- 4.6. The FSCP suggest that a Suitable Alternative Natural Greenspace (SANG) is identified and created now in order to take the pressure off the County Park. FSCP would like to see a dog park created elsewhere and the rights of way

network improved as well as improved parking facilities, access and signage to the Country Park.

The Council's Response

- 4.7. Although a full account of the Country Park's ecological value is outside the scope of the TBMS, a reference has been made in the final version of the TBMS to the Park's biodiversity in general, including its value for SAC bats and the Council's intention to designate it as an LNR. Developer contributions will be used to ensure that the increased recreational pressure will be absorbed in the Park without causing negative effects to biodiversity in the Country Park. The Strategy has costed the 'worst-case' scenario for bats which gives flexibility for achieving the best overall outcome. The role the Park will play in helping support the objectives of the TBMS will be further investigated and clarified when the Project Officer is in post.

Trowbridge Town Council

- 4.8. Trowbridge Town Council suggested more clarity is required on the definition of buffer zones, core habitat and terms such as - 'a wide swathe' of land. It has also been pointed out that if Zones A and B in Figure 6 are taken together the minimum width of core bat habitat would be 30m. This could mean some allocations are not deliverable. The Town Council also raised the issue of clarity as to why the three zones (red, yellow and grey hatched) do not seem to follow either the settlement boundary or the community area but rather both.
- 4.9. Further clarification of what is required by different types of planning application is needed. There have been a few references regarding the different requirements for different types of planning application. The representation suggests a summary of the different requirements in a table format as consultees refer to different requirements, e.g. for lighting and green space.

The Council's Response

- 4.10. In response to Trowbridge Town Council's concerns, the final version of the TBMS clarifies key terms such as 'core bat habitat'. Figure 6 has been reviewed and clarified to overcome ambiguities and thereby provide greater precision for the user of the document. The sensitivity zones and buffer zones themselves have been designed using data from visitor surveys and bat records. Whilst the evidence is considered to be robust it is difficult to monitor Bechstein's bats and therefore the Council has taken a precautionary approach to ensure that less frequent but equally important migration routes are captured.
- 4.11. Further clarification of what is required by different types of planning application is needed and the representative suggests a summary of these could be provided in a table.
- 4.12. To address this a new sub-section has been added to summarise the submission requirements for planning. This includes a table which identifies the requirements for Outline, Full, Reserved Matters and Householder planning applications.

Ecological Consultants and Local Interest Groups

- 4.13. Ecological consultants such as, Engain and Aspect Ecology as well as local interest groups - CPRE West Wilts and White Horse Alliance have raised concerns that the TBMS is not capable of mitigating indirect or direct adverse effects on bat habitats. They have stated there is insufficient evidence to provide certainty that mitigation set out in the Wiltshire Housing Site Allocations Plan will be effective, thereby calling into question the degree to which the Plan and Strategy is compliant with the Habitats Directive.
- 4.14. The destruction of 'important features' is an issue that has been raised by several consultees, referring to the destruction of hedgerows and the inability of the TBMS to fully mitigate the effects. One consultee has suggested that ancient hedgerows should be properly referred to as 'important hedgerows' in the TBMS. It has been suggested that a map to show the ecological networks of Trowbridge would be beneficial, to help ensure green corridors and biodiversity are maintained or improved.

The Council's Response

- 4.15. Natural England and Wiltshire Council are confident that the WHSAP will be delivered effectively and therefore avoid impacts. Indeed, a number of responses support the view that the WHSAP is both effective and proportionate in its treatment of necessary mitigation. The plan takes a precautionary approach (i.e. assumes all habitat lost is used by SAC bats and directs development to lower risk zones). The mitigation measures, such as including 15m buffers and 100% habitat loss mitigation, have been put into place to ensure that effects are minimised. The Council believes this is sufficient to address issues raised by ecological consultants, local interest groups and members of the public about the achievability of the strategy.
- 4.16. The Council's position regarding hedgerows is that the breaching of certain hedgerows may well be unavoidable. Indeed, such works are not prohibited by legislation. However, mitigation will need to ensure that across the site as a whole, habitat continuity is maintained. In-combination impacts will be mitigated offsite through S106 contributions to the Council mitigation scheme for residual and in-combination effects.

Developers

- 4.17. The development industry was primarily concerned with the perceived level of restriction to development that the TBMS would introduce if implemented. This is a matter that was debated during the examination hearing sessions for the WHSAP. Although the TBMS, as a proposed SPD, could not be formally examined by the Inspector, he nonetheless concluded in his report that the TBMS has been prepared in a robust manner with full regard to legislative provisions and the necessary input of Natural England. In these regards, the Inspector was satisfied that the relationship between the WHSAP and the TBMS is important in ensuring the housing allocations at Trowbridge are implemented with full regard to the protection of bats and core bat habitats.

- 4.18. The Ashton Park Strategic Site Allocation was a recurring issue in regard to its inclusion or exclusion from certain parts of the TBMS sensitivity zones. Consultees raised the point that it should be included in some maps to show its boundary in relation to the zones and other local core bat habitat. However, it is then also pointed out that it should be removed from some tables and an explanation given as to why.

The Council's Responses

- 4.19. Whilst the views of the development industry in terms of restrictions to growth are noted, the legal framework (The Habitats Regulations), national planning policy (NPPF) and local planning policy (the WCS and WHSAP) are significant considerations that have underpinned the preparation of the TBMS.
- 4.20. Having considered all representations, the Council considers the TBMS sets out a robust, reasonable and sufficient level of mitigation necessary to enable further development at Trowbridge to proceed without contravening the Habitats Regulations and this position is supported by Natural England. The TBMS aims to increase availability of access and recreation for the town.
- 4.21. Clarity has been provided in the TBMS confirming that no further mitigation is required in relation to Ashton Park in view of its specific, detailed and approved mitigation strategy plan. In addition, greater emphasis is provided to highlight the policies set out in the WHSAP covering the allocations at Trowbridge and the mitigation measures that will be required.
- 4.22. Figures 4 and 5 have been altered to reflect the fact that the Strategy does not need to provide mitigation for Ashton Park as this scheme has its own bespoke mitigation arrangements.

5. Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document – Proposed changes from 2019 consultation

- 5.1. Table 5.1 below contains a list of proposed changes to the 'Trowbridge Bat Mitigation Strategy Supplementary Planning Document - Draft for consultation, February 2019' which are supported through the consultation feedback, which can be in **Appendix A**.

Table 5.1. Draft Trowbridge Bat Mitigation Strategy – Schedule of changes from the representation responses from the consultation.

<u>Reference within original document (Feb 2019)</u>	<u>Schedule of Changes</u>
Paragraph 1.10	Amendment to the text to provide clarity on the status of the yellow zones - <ul style="list-style-type: none"> • <i>'YELLOW ZONE – <u>permission only likely to be granted in accordance with the development plan for Wiltshire</u>'</i>
Figure 1	Amendment - <ul style="list-style-type: none"> • Flow chart shade toned down to make it easier to read the text.
Paragraph 2.1.3	Amendment to the text to remove the reference to the distance between ringing records in the SAC and woodland. <ul style="list-style-type: none"> • <i>'The meta-population of Bechstein's bats has been shown to be functionally linked to the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) located <u>approximately 6.4km</u> to the north west (see Figure 2).'</i>
Paragraph 2.1.3	Draft text – <ul style="list-style-type: none"> • <i>'Figure 1 also illustrates the location of the allocations proposed in the Wiltshire Housing Site Allocations Plan in the context of the SAC and woodlands.'</i> Amended Text – <ul style="list-style-type: none"> • <i>'Figure 2 also illustrates the location of the allocations proposed in the Wiltshire Housing Site Allocations Plan in the context of the SAC and woodlands.'</i>
Paragraph 24	Amendment to the text to add a sentence to the bottom of paragraph 24 to emphasise that no further mitigation is required for Ashton Park. <ul style="list-style-type: none"> • <i>'As a consequence, no further mitigation is required over and above the bespoke mitigation scheme already proposed for Ashton Park as secured by the section 106 agreement for that development.'</i>
Paragraph 47	Amendment to the text to add new paragraph after paragraph 47 to define 'core bat habitat'. <ul style="list-style-type: none"> • <i>'Throughout this document the term 'core bat habitat' is used to <u>distinguish habitat which has been shown through surveys, or is otherwise assumed, to be preferred by one or more of the SAC bat species and which is therefore being retained, protected and buffered in accordance with this strategy. It also refers to habitat which is proposed to be created as a mitigation or enhancement for SAC species. 'Bat habitat' is used more broadly to refer to any habitat which may be used by any species of bats.'</u></i>

<u>Reference within original document (Feb 2019)</u>	<u>Schedule of Changes</u>
Paragraph 57	<p>Amendment to the text to add references.</p> <ul style="list-style-type: none"> • <u>'Cohen, K. (2017). Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016.</u> • <u>Cohen, K. (2018). Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2017.</u> • <u>Cohen, K. (2019). Castlemead s106 Ecology Monitoring Report 2018 surveys: Green Lane and Biss Woods'</u>
Paragraph 61	<p>Amendment to the text to add a reference.</p> <ul style="list-style-type: none"> • <u>'Radio-tracking studies have recorded Bechstein's bats switching roosts every 2-3 days (Schofield and Morris, 2000) although results of radio-tracking at Green Lane Wood suggest the maternity can remain in the roost for longer (Cohen 2017, Cohen 2018, Cohen pers. comm.).'</u>
Paragraph 67	<p>Amendment to the text to add a reference.</p> <ul style="list-style-type: none"> • <u>'That Bechstein's bats forage beyond the confines of the roost woodland, utilising the wider landscape, has been replicated by a number of recent radio tracking studies (e.g. Palmer et al., 2013 in Worcestershire and Cohen 2017, 2018, 2019 in Trowbridge).'</u>
Paragraph 69	<p>Amendment to the text to add a reference</p> <ul style="list-style-type: none"> • <u>'However, radio-tracking studies in <u>Wiltshire (Cohen 2017, 2018, 2019) Dorset (Schofield and Morris, 2000), the Isle of Wight (Ian Davidson-Watts, pers.comm.), and Worcestershire (James Hitchcock / Eric Palmer, pers. comm.)</u> have reported observations of bats moving directly across open fields or farmland when travelling from, or returning to, roost sites and foraging areas.'</u>
Paragraph 70	<p>Amendment to the text to add a reference.</p> <ul style="list-style-type: none"> • <u>'In addition, a number of studies in the UK have recorded Bechstein's bats crossing roads, including the A422 in Worcestershire (Palmer et al., 2013) and the A350 in Trowbridge (Cohen 2017, 2018, 2019).'</u>
Paragraph 76	<p>Amendment to the text to add a reference.</p> <ul style="list-style-type: none"> • <u>'The majority of these were located within woodland blocks, however, some day roosts were recorded outside the main woodlands, the most notable of which comprised a hedgerow tree located some 500m north of Green Lane Wood (with 100+ bats recorded emerging in 2016) (Cohen, Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016, 2017)'</u>
Paragraph 76	<p>Amendments to the text to update the status of the Bechstein's bat maternity colony to reflect their importance.</p> <ul style="list-style-type: none"> • <u>'On this basis, all of the sub-colonies are considered likely to form one large and semi-linked meta-population across the local area and the local population is conjectured to be between 350 and 700 bats (Aspect Ecology, August 2017). Natural England has confirmed that this is one of the largest known Bechstein's breeding populations in the UK and on this basis is currently considering whether to notify the woodlands as SSSI's.'</u>
Paragraph 96	<p>Amendments to the text add a reference to the 2017 to monitoring surveys.</p>

Reference within original document (Feb 2019)	Schedule of Changes								
	<ul style="list-style-type: none"> <i>'The recent finding near Green Lane Wood of a ringed lesser horseshoe bat ringed during swarming surveys at Gripwood in Bradford-on-Avon (referenced in Cohen, 2017), suggests there may be a functional link between the SAC and woodlands around South Trowbridge for lesser horseshoe bats.'</i> 								
Paragraph 117	<p>Amendment to the text add a reference to the Bat Roosts in Trees methodology under surveys aimed at Bechstein's bats and to demonstrate that all roosts and unoccupied potential roosts are potentially important.</p> <ul style="list-style-type: none"> <i>'Where trees are at risk, tree surveys should follow the Bat Roosts in Trees methodology (BTHK, 2018) Any such trees should be subject to endoscope surveys potentially with multiple inspections over the year given the well-known low encounter rates of bats using tree roosts and climbing surveys, as relevant, by an appropriately licensed bat ecologist. Further emergence and re-entry surveys of affected trees may be required, and early consultation with Wiltshire Council is advised to agree the full scope of tree surveys. Unoccupied potential roost features are as important as occupied features.'</i> 								
Table 2	<p>Amendment to text to –</p> <ul style="list-style-type: none"> change Table 2 to demonstrate that the strategic Allocation are Trowbridge will not contribute to the TBMS as a bespoke mitigation strategy will be secured by S106 and condition. refer to the use of 'an appropriate metric agreed with the Council'. Add a footnote to the clarify that the Ashton Park strategic allocation is excluded. Table 2 Bat Habitat Sensitivity Zones <table border="1" data-bbox="392 1283 1423 1921"> <thead> <tr> <th data-bbox="392 1283 595 1451">Level of Impact/ Risk</th> <th data-bbox="603 1283 1018 1451">Type of Impact/ Risk⁶</th> <th data-bbox="1026 1283 1423 1451">Implications for development</th> </tr> </thead> <tbody> <tr> <td data-bbox="392 1462 595 1921"> RED ZONE HIGH RISK (See Figure 4) </td> <td data-bbox="603 1462 1018 1921"> Impacts will arise as a result of: Recreational pressure on woodlands used by breeding Bechstein's bats Loss of habitat of critical importance to supporting breeding Bechstein's bats Impacts will arise from developments considered alone and/or in-combination with other plans and projects </td> <td data-bbox="1026 1462 1423 1921"> <u>Habitat within the red zone is likely to be critical now and / or in the future to sustain this breeding population of Bechstein's bats.</u> It is unlikely that development in this zone will be able to provide <u>adequate</u> mitigation to enable an assessment under the Habitats Regulations to conclude, beyond reasonable </td> </tr> </tbody> </table>			Level of Impact/ Risk	Type of Impact/ Risk ⁶	Implications for development	RED ZONE HIGH RISK (See Figure 4)	Impacts will arise as a result of: Recreational pressure on woodlands used by breeding Bechstein's bats Loss of habitat of critical importance to supporting breeding Bechstein's bats Impacts will arise from developments considered alone and/or in-combination with other plans and projects	<u>Habitat within the red zone is likely to be critical now and / or in the future to sustain this breeding population of Bechstein's bats.</u> It is unlikely that development in this zone will be able to provide <u>adequate</u> mitigation to enable an assessment under the Habitats Regulations to conclude, beyond reasonable
Level of Impact/ Risk	Type of Impact/ Risk ⁶	Implications for development							
RED ZONE HIGH RISK (See Figure 4)	Impacts will arise as a result of: Recreational pressure on woodlands used by breeding Bechstein's bats Loss of habitat of critical importance to supporting breeding Bechstein's bats Impacts will arise from developments considered alone and/or in-combination with other plans and projects	<u>Habitat within the red zone is likely to be critical now and / or in the future to sustain this breeding population of Bechstein's bats.</u> It is unlikely that development in this zone will be able to provide <u>adequate</u> mitigation to enable an assessment under the Habitats Regulations to conclude, beyond reasonable							

⁶ Note that impacts arising from the Strategic Allocation for Trowbridge have already been addressed through a bespoke mitigation strategy and no further mitigation is required for this allocation.

Reference within original document (Feb 2019)	Schedule of Changes		
			scientific doubt, no adverse effect on the integrity of the SAC.
	<p>YELLOW ZONE</p> <p>MEDIUM RISK</p> <p>(See Figure 4)</p>	<p>Impacts will arise on individual sites and in combination with other development as a result of: Loss and/or degradation of habitat of importance to Bechstein's, greater horseshoe and lesser horseshoe bats for foraging, commuting and roosting including:</p> <ul style="list-style-type: none"> • Buildings • Grassland • Hedgerows • Trees • Scrub • Water bodies • Riparian corridors • Availability/access to roosts 	<p>Development on greenfield sites outside the settlement boundaries will be able to demonstrate no adverse effect on site integrity of the SAC provided that:</p> <p>100% mitigation is provided for habitat loss within the allocation site boundary <u>as demonstrated by use of an appropriate metric agreed with the Council.</u></p> <p>Retained core bat habitat remains connected to the wider habitat network and is adequately buffered in accordance with this strategy.</p> <p>Core bat habitat remains relatively undisturbed by the effects of urbanisation in accordance with this strategy.</p> <p>A financial contribution is made towards funding the LPA scheme in Appendix 1 for mitigating residual in-combination effects from loss / degradation of bat habitat.</p>

Reference within original document (Feb 2019)	Schedule of Changes		
	GREY HATCHED ZONE MEDIUM RISK (See Figure 5)	Impacts will arise in-combination with other development as a result of: Recreational pressure on woodlands used by Bechstein's bats	Residential development will be able to demonstrate no adverse effect on site integrity of the SAC provided that: Funding being collected via CIL towards the LPA scheme in Appendix 2 for mitigating residual in-combination effects from recreational pressure.
Table 3	Amendments to the text to outline the data comprised to assess critical habitat. <ul style="list-style-type: none"> Table 3 Criteria applied to derive bat recreational sensitivity zones 		
	Level of Impact/Risk RED ZONE HIGH RISK (See Figure 4)	Criteria This includes land within 600m of identified woodlands containing core roosts. The Footprint Ecology Report (Footprint Ecology, November 2018) showed that the woodland bat sites draw visitors on foot for a radius of around 600m; beyond this, visit rates reduce to a low and constant rate. Any new residential development within the 600m radius is likely to increase foot visitors to the woodlands and therefore increase recreational pressure within the woodland. Recreational pressure is already being shown to have negative impacts to the woodland site, including the bat populations, so any additional incremental residential pressure would have an adverse impact on the integrity of the Bath and Bradford on Avon Bat SAC. <u>Records within the GIS database and contained in reports submitted to comply with the S106 agreement for Castlemead, show that habitat within the red zones comprises critical habitat within the core foraging and feeding ground ranges associated with Bechstein's maternity roosts providing key resources now and / or in the future, in part compensating for limitations in the core woodland habitat.</u>	

Reference within original document (Feb 2019)	Schedule of Changes	
	<p>YELLOW ZONE MEDIUM RISK (See Figure 4)</p>	<p>This zone is a composite of:</p> <p>A 1.5km buffer around 'Core Roosts⁷.' for the Bechstein's breeding population in the Trowbridge area, including Green Lane Wood, Biss Wood and Picket and Clanger Wood. These buffers are referred to as 'Core Areas' in the Wiltshire Bat SAC Guidance page 7, section 3.2 (Wiltshire Council, September, 2015) 'Core Areas' are of particular importance for foraging and commuting bats associated with the 'Core Roosts'.</p> <p>A 4km buffer around 'Core Roosts' for greater horseshoe bats and a 2km buffer around 'Core Roosts' for lesser horseshoe bats where these overlap with the Trowbridge Community Area.</p> <p>Key commuting corridors which link the above-mentioned Core Areas with the SAC which lies beyond the Trowbridge Community Area. These include: the River Biss and railway line through Trowbridge; the area known as the Hilperton Gap in north Trowbridge; land to the south west of Trowbridge and; land to the north east of Trowbridge. Evidence comes from radio tracking and verified records of Annex 2 species found in this locality.</p> <p>This zone is relevant to development at new greenfield sites and as such excludes existing urban areas as defined by settlement boundaries.</p> <p>Note that the Wiltshire Bat SAC Guidance is subject to review and this zone will need to be reconsidered if 'Core Areas' are amended in the light of new scientific information.</p>
	<p>GREY HATCHED ZONE MEDIUM RISK (See Figure 5)</p>	<p>The Footprint Ecology Report has identified the zone of influence within which new residential development is likely to result in increased recreational use of the woodland bat sites. As a minimum, the Footprint Ecology Report states that (para 6.46) the outer limit of the zone of influence should comprise the settlements of Trowbridge and Westbury. For areas outside the settlement boundary, the zone from which 75% of visitors originate has been mapped in accordance with recommendations in the Footprint Ecology Report (which comprises 3.356km for Clanger and Picket Wood and 2.656km for Green Lane Wood).</p>
<p>Paragraph 141</p>	<p>Amendment in the text to add clarity to what a Master Plan must outline.</p> <ul style="list-style-type: none"> • <i>'The Site Masterplan will demonstrate how the development proposals could be delivered in light of those constraints. <u>In particular it will demonstrate that sufficient land can be set aside for habitat to mitigate</u></i> 	

Reference within original document (Feb 2019)	Schedule of Changes
	<i>for 100% of the land lost to the development footprint. Outline planning permission, if granted, will be subject to compliance with the PP.'</i>
Paragraph 148	<p>Amendment in the text to clarify that the text refers to the allocations only</p> <ul style="list-style-type: none"> • <i>'It is expected that all direct and indirect impacts on bat habitat <u>lying within the allocations</u> will be mitigated within the respective allocated site. It is expected that core bat habitat will be retained and reinforced and enhanced as dark zones to retain connectivity for bats in the landscape. The most important general principle is that wide swathes of land are required to be set aside as core bat habitat in order to retain a permeable and functioning landscape for the target species. Development areas for each allocated site have been estimated as set out in Table 4 below. For each allocated site, it is anticipated that in most circumstances the full residual green space will be required for mitigation. <u>Dark buffer zones may be used for hard and soft landscaping provided that this use does not compromise the functioning and maintenance of the core bat habitat It protects.'</u></i>
Paragraph 152	<p>Amendment in the text to clarify the approach to mitigate the breaching of hedgerows.</p> <ul style="list-style-type: none"> • <i>'Hedgerows act as commuting structures, foraging habitat and provide feeding perches for horseshoe bats and probably for Bechstein's bat. Priority should be given to enhancing existing hedges, particularly ancient hedges, through planting up gaps and implementing improved management regimes for the long-term. Methods for restoration of hedgerows such as coppicing or laying must be specified in detail. <u>The breaching of some hedgerows will be unavoidable, but mitigation will need to ensure that across the site as a whole, habitat continuity is maintained. Mitigation for individual hedgerows should be proportionate to their importance for bats. Residual in-combination impacts will be mitigated offsite through S106 contributions to the Council's bat habitat mitigation scheme.'</u></i>
Paragraph 173	<p>Amendment to text to make reference to baseline lighting levels</p> <ul style="list-style-type: none"> • <i>'It is critical that the bat habitat zone (Zone A) is maintained in 'completely dark' conditions, defined as < 0.2 lux on the horizontal plane and less than 0.4 lux on the vertical plane (measured at 1.5m and 4m) (Bat Conservation Trust and Institution of Lighting Professionals, 2018). There must be no glare impact from the development within this zone. <u>Where baseline levels are above the lux levels stated here, the development design should ensure there is no increase above existing background light levels and ideally, where possible, reduce these towards completely dark conditions.'</u></i> •
Paragraph 196	<p>A new paragraph after paragraph 195 to summaries the requirements for planning.</p> <ul style="list-style-type: none"> • <i>'<u>8.3.5 Summary of Submission Requirements for Planning</u></i>

<p>Reference within original document (Feb 2019)</p>	<p>Schedule of Changes</p>																													
	<p><i>196. Under the Habitats Regulations 2017 (as amended) the planning authority is required to undertake an appropriate assessment before issuing planning authorisations. Developers will therefore need to satisfy TBMS requirements at each stage of the planning process. In the time between granting outline permission and submission of reserved matters it is possible these requirements may change e.g. as a result of new survey or other evidence becoming available. All applications will be judged against the most up to date evidence available.'</i></p>																													
<p>Table 4</p>	<p>A new table to outline what is required of different planning application types.</p> <p>Table 4 Information required of different planning application types.</p> <table border="1" data-bbox="392 797 1423 1973"> <thead> <tr> <th data-bbox="392 797 608 853"></th> <th colspan="4" data-bbox="608 797 1423 853">Planning Application Type</th> </tr> <tr> <th data-bbox="392 853 608 936">Submission requirement</th> <th data-bbox="608 853 807 936"><u>Outline</u></th> <th data-bbox="807 853 1007 936"><u>Full</u></th> <th data-bbox="1007 853 1222 936"><u>Reserved Matters</u></th> <th data-bbox="1222 853 1423 936"><u>Householder</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="392 936 608 1290"><u>Seek pre-application advice</u></td> <td data-bbox="608 936 807 1290"><u>Helpful to establish whether the TBMS constrains the principle of development</u></td> <td data-bbox="807 936 1007 1290"><u>Helpful to establish the extent to which the TBMS will drive layout and design of the development</u></td> <td data-bbox="1007 936 1222 1290"><u>Helpful to establish whether changes have occurred in relation to the TBMS since planning permission was granted</u></td> <td data-bbox="1222 936 1423 1290"><u>Necessary if application lies in the Red Zone</u></td> </tr> <tr> <td data-bbox="392 1290 608 1514"><u>Bat surveys</u></td> <td data-bbox="608 1290 807 1514"><u>Yes</u></td> <td data-bbox="807 1290 1007 1514"><u>Yes</u></td> <td data-bbox="1007 1290 1222 1514"><u>Yes if more than 2 years since Outline / Full application approved</u></td> <td data-bbox="1222 1290 1423 1514"><u>Potentially yes depending on nature of the proposals</u></td> </tr> <tr> <td data-bbox="392 1514 608 1973"><u>Masterplan</u></td> <td data-bbox="608 1514 807 1973"><u>Yes, to cover the entire allocation. Indicative test layouts required to demonstrate housing numbers are compatible with constraints</u></td> <td data-bbox="807 1514 1007 1973"><u>Only if permission is being sought for part of a larger allocation / development site</u></td> <td data-bbox="1007 1514 1222 1973"><u>No</u></td> <td data-bbox="1222 1514 1423 1973"><u>No</u></td> </tr> </tbody> </table>						Planning Application Type				Submission requirement	<u>Outline</u>	<u>Full</u>	<u>Reserved Matters</u>	<u>Householder</u>	<u>Seek pre-application advice</u>	<u>Helpful to establish whether the TBMS constrains the principle of development</u>	<u>Helpful to establish the extent to which the TBMS will drive layout and design of the development</u>	<u>Helpful to establish whether changes have occurred in relation to the TBMS since planning permission was granted</u>	<u>Necessary if application lies in the Red Zone</u>	<u>Bat surveys</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes if more than 2 years since Outline / Full application approved</u>	<u>Potentially yes depending on nature of the proposals</u>	<u>Masterplan</u>	<u>Yes, to cover the entire allocation. Indicative test layouts required to demonstrate housing numbers are compatible with constraints</u>	<u>Only if permission is being sought for part of a larger allocation / development site</u>	<u>No</u>	<u>No</u>
	Planning Application Type																													
Submission requirement	<u>Outline</u>	<u>Full</u>	<u>Reserved Matters</u>	<u>Householder</u>																										
<u>Seek pre-application advice</u>	<u>Helpful to establish whether the TBMS constrains the principle of development</u>	<u>Helpful to establish the extent to which the TBMS will drive layout and design of the development</u>	<u>Helpful to establish whether changes have occurred in relation to the TBMS since planning permission was granted</u>	<u>Necessary if application lies in the Red Zone</u>																										
<u>Bat surveys</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes if more than 2 years since Outline / Full application approved</u>	<u>Potentially yes depending on nature of the proposals</u>																										
<u>Masterplan</u>	<u>Yes, to cover the entire allocation. Indicative test layouts required to demonstrate housing numbers are compatible with constraints</u>	<u>Only if permission is being sought for part of a larger allocation / development site</u>	<u>No</u>	<u>No</u>																										

<u>Reference within original document (Feb 2019)</u>	<u>Schedule of Changes</u>				
	<u>Parameters Plan incorporating TBMS standards for habitat mitigation (section 8.2)</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>No</u>
	<u>Ecological Mitigation Plan</u>	<u>No</u>	<u>Yes</u>	<u>Yes</u>	<u>Potentially yes depending on nature of the proposals</u>
	<u>Baseline lighting surveys</u>	<u>Not usually, may be necessary where housing density suggests criteria may not be met</u>	<u>Yes</u>	<u>Yes if not provided in Outline application</u>	<u>Yes if standards in section 8.2 cannot be met</u>
	<u>Lighting Impact Assessment, including lux contour plots, in line with section 8.3 of TBMS</u>	<u>Not usually, may be necessary where housing density suggests criteria may not be met</u>	<u>Yes</u>	<u>Yes if not provided in Outline application</u>	<u>Yes if core bat habitat affected</u>
	<u>Construction Ecology Management Plan</u>	<u>No</u>	<u>Yes, may be deferred to condition if requirements are straightforward</u>	<u>Yes, may be deferred to condition if requirements are straightforward</u>	<u>Not usually</u>
	<u>Landscape and Ecology Management Plan</u>	<u>no</u>	<u>Yes, may be deferred to condition if requirements are straightforward</u>	<u>Yes, may be deferred to condition if requirements are straightforward</u>	<u>Not usually</u>

<u>Reference within original document (Feb 2019)</u>	<u>Schedule of Changes</u>
Paragraph 199	<p>Change to the text to include references to red and yellow zones.</p> <ul style="list-style-type: none"> • <i>'All habitat enhancement, restoration and creation must be <u>delivered within the red or EITHER within one of the yellow bat sensitivity zones OR within 1.5km of a yellow zone illustrated on the plan in Figure 4.</u></i>
Paragraph 228	<p>A new paragraph added to acknowledge that due to its existing ecological value Southwick Country Park is pursuing LNR status and as such mitigation will be required to absorb additional recreational use from new development.</p> <ul style="list-style-type: none"> • <i>'<u>While it appears Southwick Country Park offers good potential for attracting new visitors who might otherwise visit the woodlands, it should be noted the country park is of considerable biodiversity value in its own right. It contains sufficient biodiversity interest to qualify as a Local Nature Reserve and this statutory designation is being pursued by the Council and the Friends of Southwick Country Park with Natural England. The Country Park also has plenty of habitats suitable for foraging and commuting by all three SAC bat species. It has many older trees suitable for roosting by Bechstein's bats and this species was confirmed in a tree roost at the park in 2016. Southwick Country Park would be regularly used by householders in the three closest HASP allocations. Measures will therefore be required to ensure the additional pressure can be absorbed without presenting additional risks both to SAC bat species and other wildlife. The Council will discuss the best way to deliver these with the Friends of Southwick Country Park.</u></i>

Next Steps

- 5.2. This consultation has been prepared to address the legislative requirements relating to the preparation of supplementary planning documents. The representations received during the consultation process have been considered. Where necessary, officers have recommended changes to improve the clarity and effectiveness of the guidance set out with the Trowbridge Bat Mitigation Strategy – Supplementary Planning Document (SPD).
- 5.3. The final version of the Trowbridge Bat Mitigation Strategy SPD will be considered by Cabinet on 4 February 2020. Subject to Cabinet approval, a recommendation will be made to Full Council on 25 February 2020 for adoption of the SPD.
- 5.4. The final version of the Trowbridge Bat Mitigation Strategy SPD will be published on the Council's website at <http://www.wiltshire.gov.uk/planning-whsap>.

Appendix A - List of Consultation Responses

The table below contains a summary of responses to the consultation from individuals or organisations together with the Council's response and proposed actions.

All individual representations are available to view in full through the Councils online consultation portal <http://consult.wiltshire.gov.uk/portal>

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
1	Resident	Light pollution from development at Meridian Way roundabout badly affects bats from Biss Woods. Development at Little Common, North Bradley will be a serious threat to this important site.	The TBMS considers light pollution and provides appropriate measures to address the matter.	No change required
2	Resident	Land directly behind 11 Westbury Road (Allocation H2.2 in the Wiltshire Housing Site Allocation Plan) lies in the red zone, which makes proposals for housing in that location void.	The red zone, as mapped, does not include any land in the allocation for H2.2 (Land off the A363 at White Horse Business Park).	No change required
3	Resident	Sites H2.4, H2.5, H2.6 currently lie within the yellow zone for habitat sensitivity of SAC bats. Will changes in the settlement boundary take these sites out of the yellow zone	There are currently no changes proposed to the settlement boundary in relation to the allocated sites. The requirements of the Trowbridge Bat Mitigation Strategy will need to be met for the allocations, based on their location in the yellow zone.	No change required

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Southwick Country Park (SCP) is being progressed as a Local Nature Reserve (LNR) but designation is being delayed. Why is this?	This is being pursued by the Council's Legal and Countryside teams.	A new paragraph should be added after paragraph 228 to explain that Southwick Country Park is of biodiversity value and Local Nature Reserve (LNR) designation is being pursued.
		Why, given its ecological importance, was Southwick Country Park (SCP) chosen to mitigate the recreational pressure arising from it?	More recreational pressure is likely to be experienced at the Country Park and developer contributions will be used to ensure that this is absorbed without negative effects on biodiversity. The role that Southwick Country Park will play in delivering the Trowbridge Bat Mitigation Strategy will be further clarified at the delivery stage when the Project Officer is in post.	A new paragraph has should be added after paragraph 228 to explain the ecological importance of the Country Park and how any impact will be mitigated.
		Why can't H2.4 Church Lane be used as a Suitable Alternative Natural Greenspace (SANG)?	This site has been allocated for housing and as part of that a significant proportion is retained as green space. See Wiltshire Housing Site Allocations Plan for further information.	No change required
4	Resident	Statements expressing a range of opinions are made in respect of the effectiveness of the TBMS.	Comments noted.	No change required

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Is Wiltshire Council happy that proposals in the TBMS are ambitious or imaginative enough	Yes, the document has been prepared by a consultancy with specialist expertise in bats and mitigation delivery and with input from Natural England and local bat experts. Further refinements of the strategy will ensure it is fit for purpose. The mitigation is precautionary as required by the Habitats Regulations.	No change required
		The Trowbridge Bat Mitigation Strategy does not recognise the ecological importance of Southwick Country Park, anticipated Local Nature Reserve designation and the Friends of Southwick Country Park group	While a full account of the Country Parks ecological value is outside the scope of the Trowbridge Bat Mitigation Strategy, reference could usefully be made to the park's value for Special Area of Conservation bats.	A new Paragraph should be added after paragraph 228 that refers to Southwick Country Park's biodiversity value, the Friends of Southwick Country Park and the intention to progress a Local Nature Reserve designation.
		In the Document Revisions section the last revision makes reference to a map at Fig 1 which is not there.	There is an error in the text, the reference should be changed.	A change should be made to the Document Revisions Page so that reference is made to Fig 2 and not Fig 1.
		The referencing in Paragraph 2.1.3 to the allocations on the map is unclear	This can be made clearer in the final version of the TBMS.	On page 4, the last sentence in paragraph

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		What are “allocation sites”	This is explained in paragraph 2.1.3.	2.1.3, should be changed to “Figure 2....”.
		Housing allocations for Trowbridge are too ambitious. There is evidence of public health issues in areas of higher housing densities	This is a matter for the Wiltshire Housing Site Allocations Plan and has been considered through the Sustainability Appraisal process. Additional public open space will be provided through the development of the allocated sites. Public health issues are not directly relevant to the ambit of the TBMS and yet the creation of new areas for recreation and bolstering existing will be matters for the Project Officer once appointed.	No change required
		In view of the level of detail required for lighting, it should not be acceptable to submit an outline application for development within the yellow zone that would likely lead to an increase in light generation.	For most outline applications, the potential impacts of lighting can be dealt with through a parameters plan, see paragraph 8.1.141 and Figure 6 in TBMS. In some situations, outline applications would need to be supported by further information and this can be determined through early consultation with the planning department, as recommended in the TBMS.	A new table should be inserted into a new section 8.3.5, summarising the requirements of each type of planning application.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		In paragraph 8.1.146 reference to section 6.1 is wrong.	Reference should be made to sections 8.2 and 8.3, not 6.1	Paragraph 8.1.146 should be changed to refer to Sections 8.2 and 8.3. Reference to Section 6.1 should be deleted.
		Delete reference to provision of outdoor gym facilities, as they are not used	This is one of a number of suggestions which will be explored and may be relevant at some sites more than others.	No change required
		The consultee has put forward ideas for new Suitable Alternative Natural Greenspace provision to reduce potential conflicts between users at Southwick Country Park.	These options can be considered along with others during the implementation stage of the TBMS by the Project Officer in conjunction with the planning team.	No change required
		The expectations of the TBMS in relation to planning applications would be onerous for developers of very small sites such as a single property.	All developers will be expected to comply with the TBMS in a proportionate way, depending on the nature and scale of development in question.	No change required
5	Southern Water	The TBMS will not affect Southern Water as the closest asset is over 30km away	No response required.	No change required
6	Natural England	TBMS is proportionate in terms of survey requirements and the	The Council will continue to engage with Natural England on the implementation of the TBMS.	Amendments to the text should be made to clarify the status of the Bechstein's bat maternity

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		<p>approach to on-site and off-site mitigation.</p> <p>The strategy ensures a high level of certainty that development in aggregate will not become poorer for bats.</p> <p>Natural England wishes to see there is not a long lag between development occurring and mitigation being implemented. Once the Project Officer is in place, Natural England would wish to agree a reporting mechanism, so it can understand how the strategy is being implemented.</p> <p>Data suggests the size of the Bechstein's maternity colony at Trowbridge is one of, if not, the largest known in the UK. It would be good to confirm the status of the Trowbridge population.</p>	The ecological importance of the Bechstein's bat colony at Trowbridge should be recognised and referenced in the strategy.	colony to reflect their importance.
7	Resident	Making Southwick Country Park more attractive for dog walking and café visitors is at odds with the site's importance as a place for nature and tranquillity.	The role that Southwick Country Park will play in delivering the TBMS will be further clarified at the delivery stage when the Project Officer is in post.	No change required
9	Resident	Section 8.2.2 – this paragraph suggests ancient hedgerows can be breached by developments. This	Regulation 6(1)(e) of the Hedgerows Regulations (1997), permits important hedgerows to be	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		would be contrary to the Hedgerows Act 1997.	removed if required for the purpose of carrying out development for which planning permission has been granted or is deemed to have been granted.	
10	Resident	Ancient hedgerows should more properly be referred to as 'important' hedgerows to align with the Hedgerows Act.	The text is not intended to repeat the provisions of the Hedgerows Regulations 1997. It is expected that the planning authority will have considered the implications of development on important hedgerows in line with the provisions of the relevant Regulations.	No change required.
		While the Habitats Regulations Assessment and Natural England's responses require protection of hedgerows. The TBMS seems to allow for hedgerows to be grubbed out.	The breaching of some hedgerows may be unavoidable but where it is, mitigation will need to ensure that across the site as a whole, habitat continuity is maintained. In-combination impacts will be mitigated offsite through Section 106 contributions to the Council to deliver mitigation schemes for residual and in-combination effects.	No change required.
11	Resident	Recent losses of informal recreation space at Trowbridge and historical lack of funding for the Southwick Country Park, will combine with the	The role that Southwick Country Park will play in delivering the TBMS will be further clarified at the delivery stage when the Project	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Plan to endanger the wildlife established there	Officer is in post. It is intended that Community Infrastructure Levy will be used to fund agreed measures.	
12		Initial funding for habitat mitigation measures will come from developers, Wiltshire Council may be reluctant to assume responsibility for long term maintenance costs?	Long term management will be considered as part of the planning application process for allocated sites e.g. this could be undertaken management companies.	No change required.
13	Trowbridge Town Council	<p>What is the justification for designating the whole of the Trowbridge settlement area as a Bat Sensitivity Zone but exclude parts of that from the Bat Recreational Sensitivity Zone but include the areas of Hilperton, North Bradley and Westbury and exclude parts of the Southwick settlement?</p> <p>Would a 3m radii not but sufficient to cover both Bath Sensitivity and Bat Recreational Sensitivity Zones?</p>	<p>The yellow and grey hatched zones are derived from different evidence bases. The recreational zone is based on data from the Visitor Survey 2017 which identified the distance from which 75% of visitors to the woodlands come. The habitat zone is based on bat records for the area, scientific research on the three bat species concerned and habitat data from aerial photographs. However, bat records are patchy as there is no uniform survey for the area, therefore a precautionary approach is taken to identifying this zone to ensure that less frequent but equally important migration routes are captured.</p>	No change required.
		Will the mitigation approach be used just for allocation sites or all sites in	Section 7.1, Tables 2 and 3 and Figures 4 and 5 explain how the	A new table should be inserted into a new

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		<p>the zones, does it apply equally to all scales of development?</p>	<p>zones apply. The zones apply to all scales of minor and major development. Householder applications will largely fall outside the criteria except where significant amount of habitat is affected e.g. where there is an increase in the residential curtilage. Consideration will be given as to whether this can be clarified further.</p>	<p>section, 8.3.5 summarising requirements of each type of planning application.</p>
		<p>What is the definition of a “wide swathe”? If Zones A and B together are 30m wide, some of the WHSAP sites may not be able to achieve these requirements.</p>	<p>Figure 6 shows the buffer zones. Core bat habitat whether new or retained, must be buffered by a width of at least 15m at 1 lux or less from adjacent new development. This may comprise, for example, soft or hard landscaping, wildlife habitat, sustainable urban drainage systems or land providing a visual buffer for heritage assets. To qualify as core bat habitat, newly created habitat must be at least 15m wide. In addition, existing habitat can be bolstered to be at least 15m wide to qualify as core bat habitat.</p> <p>The requirement to mitigate habitat loss by 100% is likely to entail creating bat habitat which is wider</p>	<p>Figure 6 should be amended to make the image clearer, to improve the proportions and to make the text consistent with the rest of the document.</p>

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			<p>than 15m, by for example creating bat habitat in the 15m wide buffer zones.</p> <p>Calculations indicate that there is adequate space to deliver the mitigation for the quantum allocated.</p>	
14	Resident	In paragraph 8.2, if hedgerows can be breached, this will nullify the mitigation proposed by the TBMS.	The breaching of some hedgerows may be unavoidable, but mitigation will need to ensure that across the site as a whole, habitat continuity is maintained.	No change required.
15	Savills	The TBMS was not well publicised.	The consultation has been carried out in line with statutory requirements and the Council's Statement of Community Involvement.	No change required.
		The TBMS does not sufficiently recognise that it will impair recreation and access to the countryside and provision of housing in the most appropriate areas of Trowbridge. The weight given to the strategy is disproportionate to the public's interests.	The strategy is considered to provide the minimum level of mitigation necessary to enable further development at Trowbridge to proceed without contravening the Habitats Regulations and this position is supported by Natural England. The strategy aims to secure new investment in measures to support access to recreation facilities for the town.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		<p>There is no evidence to justify use of radii to define zones rather than bat flight routes. In particular, there is no evidence to support a radii of 600m for the red zone</p>	<p>The yellow habitat zone is based on bat records for the area, scientific research on the three bat species concerned (core sustenance zones) and habitat data from aerial photographs. However, bat records are patchy as there is no uniform survey for the area, therefore precautionary approach is taken to identifying this zone to ensure that less frequent but equally important migration routes are captured.</p> <p>The radius for the red zone is supported by evidence from radio-tracking showing bats are prepared to move at least 600m from the woodlands to find suitable maternity roosts. The report of the visitor survey undertaken by Footprint Ecology provides visit rate curves for those interviewees arriving on foot (Figure 4). This flattens out after 600m to a constant minimal rate. The aim of the strategy is to discourage frequent everyday use of the woods by locating housing beyond this critical minimum distance.</p>	<p>No change required.</p>

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
16	Campaign to Protect Rural England - West Wiltshire Branch	Campaign to Protect Rural England does not have confidence that the TBMS is capable of mitigating impacts on SAC bats. The TBMS contains insufficient evidence that the measures promoted will be effective. This raises doubts over whether the measures will be delivered and whether they can work. Campaign to Protect Rural England considers there are doubts over whether long term maintenance and monitoring will be achieved. What happens if it is shown that bat populations are falling?	Wiltshire Council and Natural England consider that the strategy will be delivered effectively and will avoid impacts. The strategy takes a precautionary approach (i.e. assumes all habitat lost is used by SAC bats) and directs development to lower risk zones). The mitigation measures including 15m buffers, 100% mitigation on site plus additional offsite provision are all achievable measures. Appropriate resources have been allocated including the appointment of a Project Officer to secure delivery and compliance. If bat populations are demonstrated to be falling and no natural cause can be found, it will not be possible to complete Appropriate Assessments for future developments without a plan to restore the population.	No change required.
17	Friends of Southwick Country Park	Para 9.2 Increased recreational pressure at Southwick Country Park would compromise its ecological value. New SANG would be preferable	TBMS will introduce measures to absorb the increase in recreational use at existing recreational sites without impacting wildlife and alternative SANGs will be provided if this approach is judged, through discussions, to not be adequate.	A new Paragraph should be added after paragraph 228 that refers to the Southwick Country Park's biodiversity value, the Friends of Southwick Country Park and the

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
18		Southwick not yet designated a Local Nature Reserve and Friends of Southwick Country Park are concerned that its acknowledged ecological importance is being overlooked in the TBMS which proposes that the site be managed primarily for access.	Three allocations are located close to Southwick Country Park and increased use would be inevitable. TBMS seeks to provide for these future residents through improvements which will include habitat enhancement measures. Proposals for improvements at Southwick Country Park should demonstrate these will not compromise its existing and future value for biodiversity.	intention to progress a Local Nature Reserve designation.
19		Increasing recreational use at Southwick Country Park will degrade the site's value for Bechstein's bats which is contrary to the Habitats Directive	Southwick Country Park is likely to be important for all 3 SAC bat species and therefore any proposals to increase access should demonstrate an overall enhancement for these species. Work's that require planning permission will be subject to Habitat Regulations Assessment.	
20		Create a dog park elsewhere. Improve rights of way network. Improve access, signage and parking to the above.	These alternatives will be considered at the delivery stage when the Project Officer is in post. Wiltshire Council will carry out informal consultations with Friends of Southwick Country Park over this matter	

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
21		Sites H2.4 and H2.5 currently lie within the yellow zone for habitat sensitivity of Special Area of Conservation bats. Will changes in the settlement boundary take these sites out of the yellow zone.	No, they will need to meet the requirements of the TBMS, based on their location in the yellow zone.	No change required.
22	Engain	General note of support for Trowbridge Bat Mitigation Strategy and its role in furthering the conservation of bats.	Support noted.	No change required.
23		Does paragraph 143 only refer to Full and Reserved planning applications? May be useful to have a table summarising the requirements for different types of planning applications?	Yes, a table could be inserted to clarify the requirements for different types of planning applications.	A table clarifying the requirements for each application type should be added into section 8.3.5
24		Paragraph 148 – Not all direct and indirect impacts on bat habitat can be mitigated within the site - e.g. recreational impacts on woodland.	First sentence could be clarified to make it clear that <u>only</u> mitigation for bat habitat needs to be provided within allocations	The first sentence of paragraph 148 should be amended to say " <u><i>it is expected that all direct and indirect impacts on bat habitat within the allocations will be...</i></u> "
		Paragraph 148 - Clarity needed on the meaning of 'core bat habitat'	Review terminologies to ensure there's no confusion. Core bat habitat is habitat shown to have been regularly used by	A definition of 'core bat habitat' should be added to the end of section 4.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			SAC bat species and features providing connectivity in the landscape	
25		With reference to paragraph 150 and Figure 6, does the TBMS call for a 30m buffer from the edge of all core bat habitat?	See response to representation 13.	Figure 6 should be amended to make the image clearer, to improve the proportions and to make the text consistent with the rest of the document.
		It would be helpful if Figure 6 showed Zones B and A as the same width.	Zone A is wider to reflect the fact this is likely in many cases to be wider than 15m	Figure 6 should be amended to make the image clearer, to improve the proportions and to make the text consistent with the rest of the document.
26		Paragraph 152 - It may not be possible to fully mitigate for loss of functionality of breached hedgerows.	The breaching of some hedgerows may be unavoidable but, where it is mitigation will need to ensure that across the site as a whole, habitat continuity is maintained. Mitigation for individual hedgerows should be proportionate to their importance for bats. In-combination impacts will be mitigated offsite through S106 contributions to the Council's	The wording in paragraph 152 should be revised to clarify the approach to mitigating the breaching of hedgerows.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			mitigation scheme for residual and in-combination effects.	
27		Paragraph 173 provides no reference to existing baseline light levels. This is an important consideration which could compromise the ability of development proposals to meet the dark conditions as specified in this paragraph.	Developers will not be expected to reduce current light levels, unless these are within the developers control.	A reference should be made to baseline light levels at paragraph 173.
28		Para 176 – clarity needed on whether these lighting details are only relevant to Full and Reserved matters applications.	New table could be added to summarise the submission requirements for each type of planning application including those related to lighting.	New table should be inserted into a new section, 8.3.5, summarising requirements of each type of planning application.
29	Canal and River Trust	More detail required on survey methods for tree roosts as Bat Conservation Trust (BCT) guidance is not adequate.	Tree roost surveys are a snapshot which rarely detect bats - i.e. the absence of bats does not mean the tree has no potential for bats now, or in the future. In accordance with the precautionary principle it is assumed that all trees have potential for roosting Bechstein's either now, or in the future.	The use of the 'Bat Roosts in Trees Handbook' should be referenced as this is becoming industry best practice.
		The TBMS is overly focussed on breeding roosts with insufficient recognition of other roosts.	Whilst focus on breeding roost is justified, it is agreed that other roosts are important.	Changes should be made that demonstrates that all roosts and unoccupied

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
				potential roosts are potentially important.
		Paragraph 191 – all windows on site boundaries should be tinted down to 49% reflectivity to be most effective.	Figure 6 provides adequate guidance and stipulates the standard to be met.	No change required.
		Para 8.2.2 – is there a recommendation for more effective mitigation for breached hedgerows?	The breaching of some hedgerows may be unavoidable but where it is, mitigation will need to ensure that across the site as a whole, habitat continuity is maintained. Residual impacts will be mitigated offsite through S106 contributions to the Council's mitigation scheme for residual and in-combination effects.	No change required.
30	Woodland Trust	Pleased that Pickett and Clanger Woods are located in the red hatched zone	Noted.	No change required.
		The TBMS seems to be suggesting that the Trust will be actively required to implement a range of measures (detailed in section 9.2.1 "Recognising important bat woodlands as nature reserves")	The measures listed by the Trust will largely be implemented at Green Lane and Biss Woods through the S106 agreement associated with Ashton Park (see para 2.1.2).	No change required.
		Broad welcome for the document, particularly its emphasis on delivering mitigation at a landscape scale.	Support noted.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Specific welcome for measures in para 23, 29, 46, 197, Appendices 1 and 2.		
31	Wiltshire Wildlife Trust	Corrections, presentational and factual comments on the text on pages 4, 5, 9, 41, 213, 221, 225.	These will be reviewed in finalising the document	Corrections / clarifications should be made, as appropriate.
		The TBMS would benefit from a map showing the ecological networks around Trowbridge.	Such a map does not currently exist but is being developed as part of the Council's Green Infrastructure Strategy. Absence of such a map does not compromise the proposals or effectiveness of the TBMS.	No change required.
		Table 1 – include 2600 houses at Ashton Park.	These are already included in the indicative housing requirement of 6810.	No change required.
		Paragraph 23 – include map of coherent and linked landscape for bats.	Such a map does not currently exist but is being developed as part of the Council's Green Infrastructure strategy. Absence of such a map does not compromise the proposals or effectiveness of the TBMS.	No change required.
		Figure 3 shows Biss Barn Wood which has been felled, are there plans to replant it.	The land is in private ownership and was subject to an order from the Forestry Commission to replant it. However, this was	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			revoked on appeal and there are no plans for replanting at this stage...	
		Paragraph 128 – strengthen the wording “highly unlikely to be permitted” for critical parcels of land within the red zone to “will be refused”	It is expected that some types of householder development in the red zones would not cause adverse effects in Appropriate Assessment terms even in critical parcels.	No change required.
		Table 2 - is it intended that 100% mitigation for habitat loss should be based on the updated Defra biodiversity metric?	It is intended to use the beta version of the biodiversity metric, until it is finalised by Natural England when the final version will be used.	Wording will be amended to make reference to the Biodiversity Metric published by Natural England.
		Para 135 - review of bat sensitivity zones - how will this be undertaken, what are the monitoring proposals to feed into this?	<p>Reviews would be undertaken periodically as and when information becomes available through bat surveys / research and to be consistent with the evidence base used for Appropriate Assessment.</p> <p>Scheme of monitoring to be agreed once Project Officer in post (see paragraph 205).</p> <p>The issue of reviews is fully addressed in the wording of paragraphs 135 and 136 (to be revised to 136 and 137).</p>	No change proposed.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Paragraph 198 – it is not clear how the 6 ha of woodland has been calculated.	Professional judgement suggests a 5% increase in the area of existing woodland at Green Lane Wood and Biss Barn Wood would be broadly appropriate. This has been tested using the Defra metric. 5% = 6 ha of woodland which generates an uplift of approximate 1/3 of the Biodiversity Units which would be lost from the 35 ha of land lost to the footprint of the allocations in aggregate.	No change required.
		Wiltshire Wildlife Trust (WWT) has a strategic interest in land adjacent to land it currently owns. It would make sense to consolidate these with land purchased for mitigation.	Noted, the Council recognises WWT as a potential partner for mitigation delivery.	No change required.
		Is there a distinction between monitoring proposed at paragraph 206 and that proposed for Ashton Park	Yes, separate funding has been identified for each. Monitoring facilitated through the Project Officer for the TBMS will be funded through Community Infrastructure Levy. Ashton Park is to be funded through a S106 agreement linked to planning permission.	No change required.
		Appendix 1, Page 63 - Costed habitat mitigation calculates cost per house	Habitat mitigation measures are only relevant to greenfield	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		based on allocation numbers of 1050 dwellings. However, paragraph 213 says there could be 2107 dwellings.	development - i.e. 1050 on the allocation sites. This is a minimum as there may be additional greenfield development coming through Neighbourhood Plans. It is expected that other housing will be delivered within settlement boundaries and is not therefore anticipated to impact on SAC bat habitat, therefore no S106 monies would be due.	
		A blanket zone of restraint (red hatched zone) is unnecessary. This should be changed to a consultation zone where applications are assessed on their merits.	There is good evidence from the Castlemead development and the visitor surveys that a zone of restraint needs to be imposed.	No change required.
32	Taylor Wimpey Aspect Ecology, Taylor Wimpey	The risk of recreational pressure should be assessed on the basis of travel distance for residents, not linear distance. Wiltshire Council accepted this latter approach for Ashton Park.	Footprint Ecology is the market leader for visitor studies in relation to protected areas which are vulnerable to recreational pressure. The Council has adopted their advice on what comprises the most appropriate measure to justify the red zone. The Appropriate Assessment (AA) for Ashton Park succeeded on the basis of significant changes to the scheme design and a wide-ranging package of mitigation measures. The in-combination AA	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			<p>relied on what is now the TBMS to address residual and in-combination effects.</p> <p>A cornerstone of the Shadow Habitat Regulations Assessment undertaken by David Tyldesley Associates (DTA) for Ashton Park was that mitigation should not be contrived and should be robust for the lifetime of the development.</p>	
		<p>Most people who use the woods arrive by car therefore the red hatched zones will be ineffective. Recommendations are provided for an alternative approach to the TBMS based on a conversation with a professional ecologist.</p>	<p>Data from the Footprint Ecology report shows the majority of visitors to Green Lane Wood arrive on foot but all visitors to Pickett and Clanger Woods arrive by car.</p> <p>Recommendations noted. However, experience of Council Ecologists is that these do not offer the certainty required to enable Appropriate Assessments to conclude, no adverse effects beyond reasonable scientific doubt.</p>	No change required.
33	Resident	<p>Welcomes the strategy as it will provide greater confidence in determining planning applications which could impact the SAC</p>	No response required.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
34	Resident	Corrections, presentational and factual comments on the text in Section 1, Section 2	The many comments regarding references are welcomed. These will be reviewed in finalising the document.	Changes should be made to the text in Sections 1 and 2.
		Paragraph 57 – cannot find Bechstein’s Bat report on Council website.	The 2017 report by Aspect Ecology is contained within the Environmental Statement for the Ashton Park planning application unlike the earlier version which was a separate document.	No change required.
		Paragraph 61 – suggest adding references to most recent survey reports for Castlemead undertaken in 2017 and 2018	Reference to these would be useful. Monitoring reports completed in relation to Castlemead are now on the planning portal.	References to recent monitoring activity undertaken in respect of the Castlemead development should be added to TBMS.
		Paragraph 116 – the method proposed for tree inspections should be specified to include endoscopic surveys and multiple inspections over the year	Tree roost surveys are a snapshot which rarely detect bats i.e. the absence of bats does not mean the tree has no potential for bats now or in the future. In accordance with the precautionary principle, it is assumed that all trees have potential for roosting Bechstein’s either now or in the future.	Reference should be made to the ‘Bat Roosts in Trees Handbook’ methodology to provide greater clarity in respect of surveys aimed at Bechstein’s bats.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Figure 6 – various queries raised.	See response to representation 13.	Figure 6 should be amended to make the image clearer, to improve the proportions and to make the text consistent with the rest of the document.
		Paragraph 199 – why can't enhancement be provided in the red hatched zones	Enhancement can be provided in the red zones.	Paragraph 199 should be amended to include reference to yellow and red hatched zones.
		Housing now at a higher density than originally conceived. This will lead to detrimental effects on bats.	Whilst this is the case, increasing the density of housing on certain sites should not affect the ability to deliver the mitigation measures set out in TBMS.	No change required.
35	Resident	The mortality of bats attempting to cross Frome road should be taken into account.	The speed limit along the section of Frome Road that will be affected by new development is 30mph. Mortality rates involving traffic travelling at 30mph are expected to be low (see Environmental Statement and Habitat Regulations Assessment for Ashton Park, which is available on the Council's planning portal).	No change required.
		Site specific queries regarding the value of ecological features for bats	The TBMS is intended to provide mitigation for development on land	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		on land behind Blind Lane (Southwick).	coming forward in the WHSAP, Neighbourhood Plans and rural exception sites. If land at Blind Lane comes forward as an allocation it will need to comply with the TBMS.	
		If as a result of the TBMS, Southwick Country Park is turned into a 'doggy theme park', this would potentially harm the park's wildlife, which includes Bechstein's bats. The focus for increased visitor pressure should be Biss Meadows	More recreational pressure will be experienced at the Country Park and developer contributions will be used to ensure that this is absorbed without negative effects on biodiversity. In accordance with the precautionary principle, the TBMS has costed a package of mitigation measures on a worst-case scenario. The role that Southwick Country Park will play in delivering the TBMS will be further clarified at the delivery stage when the Project Officer is in post.	A paragraph after 228 has been added to acknowledge that due to its existing ecological value, mitigation will be required to absorb additional recreational use from new development. The Council will discuss the best way to deliver this with Friends of Southwick Country Park.
		The provisions asset out within the TBMS are uncertain, untested and therefore ineffective.	The TBMS is a precautionary approach based on available bat and habitat evidence, professional interpretation, consultation with Natural England and input from local bat experts. It balances the planning need for housing against restricting growth in sensitive zones and securing S106 and CIL	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			<p>monies to deliver new habitats and SANG measures. Experience from Castlemead shows additional governance to usual planning enforcement is required to secure the necessary woodland, scrub and grassland habitats which are otherwise not difficult to create.</p> <p>The test for AA is certainty as to the absence of adverse effects beyond reasonable scientific doubt, not beyond any doubt whatsoever.</p>	
36	White Horse Alliance	The red hatched zones are not adequate and development is already occurring in them.	The red hatched zones are supported by the evidence provided from bat surveys and visitor surveys.	Changes should be made to Table 2 and Figures 4 and 5 to demonstrate that the Strategic Allocation at Trowbridge will not contribute to the TBMS as a bespoke mitigation strategy will be secured by S106 and condition.
	Independent review prepared in support of the White Horse Alliance representation	Uncertainty exists over the effectiveness of the mitigation measures agreed as part of the Ashton Park scheme. Adding further habitat mitigation (as proposed by the TBMS) would not provide a level of	The new habitat types to be created are low risk - i.e. are readily created and reliance is not placed on bat houses over which evidence in terms of effectiveness is uncertain. The main aim of the	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		scientific certainty that the integrity of the Bath and Bradford on Avon Bats SAC will not be compromised by future development.	TBMS is to safeguard and bolster foraging and commuting habitat. The TBMS supports the 6 greenfield sites allocated at Trowbridge within the WHSAP. If other greenfield sites are proposed through Neighbourhood Plans and/or the review of the Wiltshire Core Strategy they would need to be demonstrated to be acceptable through a separate Habitats Regulations Assessment.	
		Uncertainty over mitigation for addressing effects of recreational pressure.	The Council will work with local community, landowners and NGOs to identify suitable sites or measures for existing sites. This will start when a Project Officer is appointed.	No change required.
		Can't rely on compliance to deliver the mitigation.	Compliance worked at Castlemead once the problem came to Wiltshire Council's attention. One of the roles of the Project Officer will be to ensure compliance. .	No change required.
		If developers and promoters had been engaged directly before the strategy was published, concerns could have been raised informally.	The consultation process has enabled any matters to be raised and responded to.	No change required

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
37	Persimmon Homes Wessex	Add text to page 10 explaining why the requirements of the TBMS will not be applied to the Ashton Park site. The Ashton Park application boundary should be included on relevant plans. Remove Ashton park from relevant zones.	Paragraph 24 should be expanded to explain that Ashton Park has its own bespoke mitigation scheme, and its status reflected in Figures 4 and 5.	A sentence should be added to bottom of paragraph 24 to emphasise that no further mitigation is required for Ashton Park. Figures 4 and 5 should be amended to include the site.
38		Recommend including explanatory footnote to Tables 2 and 3 to exclude Ashton Park. Question the assertion that recreational pressure is having a direct impact on the bat population.	Agree it would be useful to clarify that the strategic allocation is excluded. Evidence from the site visits / surveys leads the Council to conclude that recreational pressure has the potential to lead to both direct and indirect impacts on Bechstein's bats.	A footnote should be added to Table 2 to explain that impacts arising from the Ashton Park Strategic Allocation for Trowbridge have already been addressed and require no further mitigation.
39		Exclude Ashton Park from Figures 4 and 5 and update footnotes.	See response to rep 38	See response to representation 38.
40		Paragraph 148 – concerns raised that if the full residual area of green space is required for mitigation, there will not be adequate room for formal and informal open space.	The Council considers it is possible to achieve necessary requirements by maximising multi benefits of areas of green space.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
41		Paragraph 150 – Are 15m buffer zones in addition to the estimated residual green space identified in Table 4?	Yes, changes can be made to Figure 6 in the TBMS to clarify the requirements	No change required.
42		The TBMS should clarify that S106 obligations required to deliver the mitigation strategy will not apply to Ashton Park. Viability assessment needed to determine whether S106 contributions are viable	The Council believes this is already clear from the text in at paragraph 208. We consider S106 contributions would not threaten viability.	No change required.
43		Paragraph 208 should clarify that S106 obligations required to deliver the mitigation strategy will not apply to Ashton Park. Persimmon would welcome the opportunity to work with Wiltshire Council over the next draft of the TBMS.	See above. Persimmon's points are clearly made and further consultation probably not required given that the TBMS is not intended to cover the planning application at Ashton Park	No change required.
44		Delays in publishing the TBMS have stymied delivery of housing in Trowbridge. Wiltshire Council should not adopt the TBMS as a Supplementary Planning Document until the Wiltshire	The process of preparing the TBMS and the WHSAP has been complex. It is indeed the Council's intention to adopt the TBMS SPD at the same time as the WHSAP.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		<p>Housing Sites Allocations Plan examination process is concluded.</p> <p>The Sustainability Appraisal did not test all reasonable alternatives in the Trowbridge Community Area Remainder. This could have yielded locations which would have presented lower risk to bats.</p> <p>Wiltshire Council must holistically review the spatial strategy for Trowbridge through the Wiltshire Local Plan Review process.</p>	<p>The whole of the Trowbridge Community Area Remainder is within the bat habitat sensitivity zone.</p> <p>It is agreed that the review of the Wiltshire Core Strategy will once again undertake an holistic site assessment process at Trowbridge.</p>	
45	Redrow Homes (840359)	H2.1 and H2.2. lie close to the red zone. 'Willowy Copse' and 'Railway Woodland' are known to support large and internationally significant breeding meta populations of Bechstein's bats. Why weren't allocations further away from these important habitats considered during the preparation of the WHSAP?	The allocation of sites is not the role of the TBMS.	No change required.
46		The impact of the TBMS on housing delivery is uncertain. Survey work is seasonally constrained, and it is not clear from Table 4 whether sufficient greenspace will be available for mitigation <u>and</u> the proposed 30m buffers. Ambiguities in the Supplementary Planning Document	Developers and their ecologists should have been aware of this issue from the adoption of the Core Strategy, the publication of the Bat Special Area of Conservation Guidance, the Ashton Park allocation and	Figure 6 should be amended to make the image clearer, to improve the proportions and to make the text consistent with the rest of the document.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		could take time to resolve through pre-application discussions.	responses to other planning applications.	
		Arbitrarily applying a zone of minimum 30m is onerous and could significantly constrain capacity. It is essential that Wiltshire Council implements an approach that is flexible that responds to the site and survey results.	The Council fully intends to be as flexible as possible. Initial calculations suggest the quantum of mitigation measures is eminently deliverable.	No change required.
47		Conflict of interest by TBMS author who as well as being a Technical Direct with Johns Associates, is also Secretary of the Wiltshire bat Group. It is essential that the Council's policies are based on information that is factually and scientifically sound and impartial and it appears this is not the case.	The data comes from the Biological Records Centre and a wide range of sources listed in Section 3.2.7 and the direction comes from the Wiltshire Council brief, Council Ecologists, Natural England and local bat experts. The consultant referred to is a member of CIEEM and complies with its Code of Professional Conduct. The TBMS is therefore based on a robust scientific approach. The report is therefore impartial and it is considered that there is no conflict of interest.	No change needed.
48	Savills	Welcome the TBMS.	These comments have been reviewed and changes have been made.	See proposed changes to be made in response to representation 34 above.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Broadly reiterates comments made by other consultees with a view of improving accuracy and clarity.		
49	Wiltshire Bat Group	Query over why such low levels of access to Biss Wood. Knee-high kick fencing may be sufficient to prevent people straying into the woods	The survey was undertaken in line with a standard protocol and visitor levels reflect the usage at that time. A warden due to be employed when development of Ashton Park begins will review measures need to ensure public pressure does not affect breeding bats.	No change required.
50		Surveys undertaken to support the TBMS should be made public.	The TBMS is supported by data available from the Biological Records Centre, data to inform planning application for Ashton Park, as well as publicly available research and the experience of local bat ecologists.	No change required.
51	HGT Developments Ltd	An ecologist will need to work closely with a lighting specialist to meet the lighting requirements of the SPD.	This is likely to be necessary and already occurs for relevant planning applications.	No change required.
52		Concern about whether it is possible to receive a timely response to pre-applications.	The TBMS seeks to standardise the approach to applications in the area which currently demand a bespoke response.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
53		Through consultation there needs to be an opportunity to agree level of baseline lighting survey appropriate to individual circumstances.	Agree, this is covered in the TBMS.	No change required.
		Automatic assumption that allocation developments should apply bat survey effort commensurate with the industry standard for high quality / high risk areas, but this could be refined [down] for some sites through consultation	The yellow and red hatched zones are considered to be high quality / high risk areas.	No change required.
		Surveying for Bechstein's bats would impose significant constraints on developers	As explained in the TBMS, surveys for Bechstein's at allocation sites are unlikely to be effective. The document sets out how Bechstein's bats should be considered. However, it is recognised that clarity should be given about the meaning of broadband surveying for horseshoe bats.	Clarity should be provided over what is meant by broadband surveying for horseshoe bats.
		When would development be accepted in the red zone? Where is the survey evidence to support the red zone?	Surveys undertaken of bats trapped at Green Lane Wood for Castlemead form the basis of assumptions used to fix the red zone at 600m	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
54		30m buffer is arbitrary and overly onerous	See the response to rep 13	See the response to representation 13.
		On what basis is 'key bat habitat' features defined?	'Core bat habitat' should be defined at the bottom of section 4	See the response to representation 24.
		On what basis has the quantum of green space mitigation been allocated.	Greenspace is not allocated in the TBMS but table 4 demonstrates that it should be possible to meet the TBMS habitat requirements after an allowance is made for the footprint of development.	No change required.
		Can Sustainable Drainage Schemes be included in the green space requirements?	Sustainable Drainage Schemes can be designed to provide bat habitat, see section 8.2.4	No change required.
		Could special dispensation be given to developers who have already committed resources to allocation sites.	No, developments must be able to demonstrate they are compliant with the Habitats Regulations which is the purpose of the TBMS.	No change required.
		Can offsite land in the developer's control be used to offset/compensate for potential effects?	Yes potentially, subject to location and ability of the site to contribute to the aims of the TBMS. Early discussions with the Council would be needed.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		The combined tariff per dwelling for yellow and grey zones is overly onerous.	The tariff for yellow zones is payable through S106 while the tariff for grey zone comes out of CIL, the additional money payable by developers is not considered to be onerous	No change required.
		Specific bat mitigation parameters plan required and an ecological mitigation plan required. Overly onerous.	A parameters plan incorporating bat mitigation is required. It is not unusual to require a parameters plan at outline and a detail mitigation scheme at full application stage	No change required.
		Lighting to be considered from the outset at pre-application stage.	While lighting can be dealt with through the parameters plan for outline applications, full details will be required for full applications. This is already a routine requirement for applications in Bradford-on-Avon, Bath, & Trowbridge	No change required.
		Site specific queries in relation to Elizabeth Way.	These points can be appropriately addressed through pre-application enquiry process.	No change required.
55		Paragraph 100 - clarification needed on the number of static detectors required as there appears to be	The number of statics required will depend on site conditions and potential impacts of the scheme. The purpose is to ensure detection	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		<p>conflict with the Bat Conservation Trust (BCT) guidelines.</p> <p>Clarify what is meant by 'potential flyways' as having static detectors for each flyway appears excessive</p>	of SAC bat flightlines which are used regularly or seasonally. This may mean more statics are required that the BCT guidelines suggest. As always, where doubt exists then pre-application advice should be sought from the Council.	
56	Ecology Solutions	Paragraph 105 – unclear whether baseline lighting surveys would be required for outline applications	Planning submission requirements now clarifies in a new table at the end of section 8.	See the response to representation 23.
57		Paragraph 109 states that baseline light measurements should always be taken in absence of moonlight. This is considered unreasonable as bats may fly in moonlit conditions	The TBMS guidelines adopt the Bat Conservation Trust / Institute of Lighting Professionals guidance. Absence of moonlight is used as a standard as this represents worst case scenario (i.e. the darkest possible conditions). It is acknowledged that bats will fly in moonlit conditions, however their behaviour will change to avoid more brightly lit areas.	No change required.
58		Paragraph 129 – noise is unlikely to be a problem to commuting / foraging bats, only to roosting bats. Guidelines distances needed.	Agree that bats are relatively tolerant of noise depending on its characteristics. Little research to base fixed guidance on therefore a precautionary but reasonable approach is required	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
59		Paragraph 130 – developers are expected to retain and enhance foraging and commuting routes on site. Therefore, no adverse effects can occur and there is no need for mitigation for in-combination effects	There is degree of uncertainty associated with mitigation/enhancement and, in accordance with the precautionary principle and the Habitats Regulations e, in-combination effects are anticipated and are therefore addressed through the TBMS.	No change required.
60		Paragraph 131 – biodiversity offsetting metrics are generally criticised as being simplistic and overvalue habitats of low ecological interest, as such better to use professional judgement	Professional judgement can be variable. Reaching agreement lengthens the determination process. The Environmental Bill is advising the use of metrics.	No change required.
61		Residential areas outside the main settlements in the yellow zone should have a buffer around them to recognise their higher intrinsic light levels	Higher light levels in these areas will be variable, more appropriate to deal with this matter on a case by case basis.	No change required.
62		Query over inconsistencies between Table 3 and Figure 4.	As Table 3 explains, there is a 1.5km buffer for Bechstein's and a 4km buffer for greater horseshoe. The buffers are not entirely consistent with the Bats SAC guidance as it was prepared in 2015. Since then more data has	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			become available, which has been used in preparing the TBMS.	
		Paragraph 141 refers to 'key bat habitat' but no definition is provided.	Key bat habitat, important bat habitat now termed 'core bat habitat'.	See response to representation 24.
63		Paragraph 143 should clarify which type of planning application it is referring to.	It refers to full and reserved matters applications.	See the response to representation 23.
64		Paragraph 146 – typo last line to read section 8.2 below	Agree.	Typographical error to be corrected.
65		Paragraph 147 should clarify which type of planning application it is referring to	Agree.	See the response to representation 23.
66		Paragraph 148 refers to 'important features' and 'core bat habitat' but no definition is provided	Agree.	See the response to representation 24.
67		The need to buffer new habitat by 15m may dissuade developers from providing bat habitat in the first place. New habitat should not be required to have a buffer.	There is no option but to provide 100% mitigation for lost habitat on site and this must be buffered in accordance with the TBMS.	No change required.
		Paragraph 152 suggests that hop-overs are not an acceptable means of mitigation, however it has been	While it is not impossible that such measures could be effective, there is no evidence that they are and there is some evidence to suggest	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		accepted on other species as mitigation for the same species.	they aren't. Each situation should be judged on its merits, rather than hop-overs being used without question.	
68		Paragraph 160 – what level of noise that would be unacceptable for recreational use of bat mitigation habitat.	Bats are relatively tolerant of noise depending on its characteristics. At this stage, there is little research to base fixed guidance upon therefore a precautionary, but reasonable approach, should be exercised on a case by case basis.	No change required.
69		Paragraph 170 (as set out for para 130 above (representation 60)) where enhancement is achieved, there is no residual impact, therefore no in-combination effect and therefore S106 contributions should not be payable.	There is a degree of uncertainty associated with mitigation / enhancement. Therefore, in accordance with the precautionary principle, in-combination effects are anticipated and addressed through the TBMS.	No change required.
70		The TBMS is more stringent than the requirements of the Wiltshire Housing Sites Allocations Plan (WHSAP) Habitat Regulations Assessment in relation to buffer distances (it required 10-16m corridors below 1 lux)	The final version of the WHSAP has been amended to be consistent with the TBMS.	No change required.
71		Paragraph 196 - comments akin to those for representations 60 and 70 above.	As above for representations 60 and 70.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
72		In applying the precautionary principle, Wiltshire Council should not be aiming for zero risk (EC advice 2000).	Wiltshire Council is not aiming for zero risk but compliance with the Habitats Regulations and applying the test of beyond reasonable scientific doubt.	No change required.
73		Paragraph 238 – no allowance for developments that chose to include a SANG to avoid paying the levy. Exemptions should be allowed.	New SANGS need to be large enough and interesting enough to attract people who would otherwise visit the woodlands. Most allocations could not achieve this within the allocation boundary.	No change required.
74	Coulston Estates	Concerns raised about the cumulative effect of the TBMS requirements and wider planning measures on the viability of sites. There needs to be clarity over what is required for the different types of planning applications.	We consider S106 contributions would not threaten viability. See response to representations 23 and 66.	No change required.
		Will phased applications relating to less than the full allocation be acceptable (assuming comprehensive masterplan provided)	Yes, provided they comply with the masterplan.	No change required.
		Clarity needed over the 30m buffer zone and how 'core habitat' is going to be defined	Agree, a point raised in several other responses and a matter to be addressed.	See the response to representations 24 and 25.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Is further new survey required for Elm Grove?	The currency of data will be a matter for the applicant to address. This will be a matter for the planning application process to consider. Should further data be required this would involve additional survey work.	No change required.
		Paragraph 132 - will Community Infrastructure Levy (CIL) be increased to cover the mitigation required by applications in the grey hatched recreation zone.	No, CIL rates will not be increased.	No change required.
75		Clarification needed over when in the planning process each of the requirements in paragraphs 141 – 143 is needed	See the response to representations 23 and 66.	See the response to representations 23 and 66.
76		Paragraph 150 – clarify whether it is only mitigation for bat <u>habitat</u> loss that needs to be mitigated within allocations	See the response to representations 24.	See the response to representations 24.
77		Para 148 – Definition needed for 'core bat habitat'	Agree. A change should be made to the text to clarify the definition.	See the response to representation 67.
		Para 150 concerns about the width of the buffer being 30m, also a lack of clarity in Figure 6	See the response to representation 25.	See the response to representation 25.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
78		Concerned that the buffers in the TBMS go beyond that specified in the WHSAP Habitats Regulations Assessment.	See the response to representation 71.	See the response to representation 71.
		Paragraph 152 – it may be too onerous to comply with, it may not be possible to mitigate for breached hedgerows	See the response to representation 26.	See the response to representation 26.
79		Paragraph 173 make no reference to baseline light levels.	See the response to representation 27	See the response to representation 27.
80		Raises some of the same points as raised in relation to H2.1.	See the response to representation 74	See the response to representation 74.
81	Newland Homes	As representation 75.	See the response to representation 75	No change required
82		Is further new survey required for Upper Studley?	This would be matter for the planning application process to determine.	No change required
		As representation 76 but with site specific queries for Upper Studley.	See the response to representation 23.	See the response to representation 23
83		As representation 77.	See the response to representation 24.	See the response to representation 24

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
84		Table 2 and Figure 4 – it is considered that there will be areas within the yellow zone that do not provide suitable habitat for SAC bats and if this is confirmed, reduced contributions from development should be sought.	Surveys cannot confirm the presence or absence of Bechstein's bats. The TBMS takes a precautionary approach based upon the best available scientific information. Notwithstanding that point, each application will be considered on its merits, including the results of independent surveys.	No change required.
85		As representation 78	See the response to representation 25.	See the response to representation 25.
86		As representation 79	See the response to representation 26.	See the response to representation 26.
87		As representation 80	See the response to representation 27.	See the response to representation 27.
88				No change required.
89	CTM Wildlife	Figure 4 – it appears the yellow zone only covers part of Biss Brook. It should cover the whole of the Brook as this comprises core bat habitat.	It covers that part of the Brook which may be affected by development. The Brook is undoubtedly a commuting route (and therefore 'core bat habitat'). While it currently doesn't fall under the TBMS, planning applications affecting the Brook may need to meet similar criteria in line with development plan policies.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
90	Castlewood Properties Ventures Ltd (supported by a technical note from consultants (NPA acting for Castlewood Properties Ventures Ltd))	<p>The TBMS goes too far in terms of proposed scope. It does not meet the definition of Supplementary Planning Document.</p> <p>Bat mitigation should be site specific, informed by master planning and the evidence submitted to support a planning application.</p>	<p>The Council believes it meets the tests for SPD.</p> <p>The Council considers the TBMS provides the minimum level of mitigation necessary to demonstrate planned developments will have no impacts alone and in-combination.</p>	No change required.
		<p>The TBMS is overly prescriptive. It assumes all green space within allocations will provide bat mitigation (see page 2, bullet point 5).</p> <p>The evidence base that supports the TBMS is insufficiently detailed, and it is unclear on what basis it has been determined that proposed housing site allocation H2.2 is an important area for bats.</p>	<p>The TBMS needs to be sufficiently prescriptive to enable the Habitats Regulations Assessment for the Wiltshire Housing Sites Allocations Plan (WHSAP) to be concluded favourably.</p> <p>Provided any formal sports pitches are not lit it is a fair assumption that all green space can provide bat mitigation, albeit sports pitches would be of lower quality than rough grassland, scrub or woodland.</p> <p>Assumptions have been made based on bat records, survey evidence and aerial photographs. Bat records are patchy therefore a precautionary approach has been taken to ensure that less frequent but important migration routes are captured. This precautionary</p>	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			approach is necessary given the inherent difficulties with surveying Bechstein's bats and the need to provide connectivity despite lack of data for the wider landscape.	
		TBMS needs to explain how conflicts between bat and highway lighting requirements will resolved.	The required buffer of 15m to core bat habitat will ensure no conflict with highways requirements.	No change required
		<p>Is the estimated residual green space identified in Table 4 for H2.2 required exclusively for bat mitigation or is this for addressing other constraints as well? This is confusing.</p> <p>Unlike the North Somerset and Mendip bat SAC guidance, TBMS does not include a clear method for calculating required areas for bat mitigation. Without this how can future windfall sites be assessed, how can site viability be tested?</p>	<p>The residual greenspace is that which is left after allowing for housing at 30dph, therefore it includes allowance for all other constraints.</p> <p>The Council expects that developments will be able to use the Defra Biodiversity metric to assess viability etc.</p> <p>Future windfall sites are not expected to come forward for green field sites (other than as NP allocations or rural exception sites).</p>	No change required
		Castlewood Property Ventures and Linden Homes wish to be involved in further stages of the TBMS process.	The Council will continue to work positively with landowners and developers to address specific mitigation proposals.	No change required

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
91	Barratt Homes Bristol	Arnolds Hill Farm is outside the red and yellow zones and therefore this site should be acceptable for development	The TBMS does not extend into the Bradford on Avon Community Area. Further greenfield development with the potential to impact the Special Area of Conservation would need to be subject to appropriate assessment and meet high standards of bat mitigation. This matter will be addressed through the Wiltshire Core Strategy Review process.	No change required.
92	Barratt Homes	Paragraph 141 - H2.3 Elizabeth Way is in multiple ownerships and will be brought forward through separate planning applications. Provided appropriate mitigation is provided and evidenced we do not see the need for a master plan for the whole site.	The master plan will be required to ensure mitigation is adequate in terms of quantum, connectivity and design.	No change required.

Appendix B – Press advert and insertion into the Town and Parish Newsletter

Wiltshire Council Local Development Framework Notice of consultation on Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document

Town and Country Planning (Local Planning) (England) Regulations 2012 (Part 5 Regulations 11 to 16)

Planning and Compulsory Purchase Act 2004

Wiltshire Council is consulting on a Draft Trowbridge Bat Mitigation Strategy (Prepared in support of the Draft Wiltshire Housing Sites Allocations Plan) Supplementary Planning Document (SPD). When adopted it provides a detailed approach to considering impacts of development in the Trowbridge area on the Bath and Bradford on Avon Bats SAC. This will help inform strategic planning for the area's future housing needs.

Availability of documents

The Trowbridge Bat Mitigation Strategy SPD and information on how to make comments will be published on **21 February 2019**. The documents will be available on the Wiltshire Council website at: <http://www.wiltshire.gov.uk/planning-policy>.

Hard copies of these documents will also be made available during normal office hours at: Trowbridge, Bradford on Avon and Westbury libraries; and the main Council offices in Trowbridge (County Hall).

How to comment

• Comments are invited on these documents **from 21 February until 5pm 21 March 2019**.

Comments can be made:

- Online via the Council's consultation portal: <http://consult.wiltshire.gov.uk/portal>
- By email using the form available at <http://www.wiltshire.gov.uk/planning-policy> and returned to spatialplanningpolicy@wiltshire.gov.uk
- By post in writing to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN

If responding by post, comment forms are available online and from the listed libraries above and the Trowbridge Council office (County Hall).

Next steps

All comments received during the consultation period will be taken into account. Final versions of the Trowbridge Bat Mitigation Strategy SPD will be submitted for approval by Cabinet, with the SPD being considered for recommendation to Full Council for adoption. Any queries should be made to Spatial Planning, Economic Development and Planning, Wiltshire Council on (01225) 713223 or spatialplanningpolicy@wiltshire.gov.uk.

, Corporate Director – Growth, Investment and Place
Wiltshire Council

Appendix C - Letter sent by email or post

Spatial Planning Policy
Economic Development and Planning
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

19 February 2019

Our reference: «Person_ID»

Dear «Given_Name» «Family_Name»,

Notice of consultation on Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document

Wiltshire Council is consulting on a Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document (SPD), which has been prepared to support the Draft Wiltshire Housing Site Allocations Plan and the Wiltshire Core Strategy.

It is a strategy for considering the impacts of development in the Trowbridge area on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and sets out an approach for mitigation to avoid significant adverse impacts.

Consultation documents

The Draft Trowbridge Bat Mitigation Strategy SPD and information on how to make comments will be published on **21 February 2019** via the Wiltshire Council website at: <http://www.wiltshire.gov.uk/planning-policy>

Hard copies of these documents will also be made available during normal opening hours at: Trowbridge, Bradford on Avon and Westbury libraries; and the main Council office in Trowbridge (County Hall).

How to comment

Comments are invited on the Draft Trowbridge Bat Mitigation Strategy SPD **from Thursday 21 February until 5pm Thursday 21 March 2019**.

Comments can be made:

- Online via the Council's consultation portal: <http://consult.wiltshire.gov.uk/portal>
- By email using the form available at <http://www.wiltshire.gov.uk/planning-policy> and returned to spatialplanningpolicy@wiltshire.gov.uk
- By post in writing to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN

If responding by post, please use the comment forms that are available online and from the listed libraries above and the Trowbridge Council office (County Hall).

Next steps and further information

All comments received during the consultation period will be taken into consideration before the SPD is finalised and presented to the Council's Cabinet and subsequently Full Council for adoption.

Should you require further information on the consultation, please email:

spatialplanningpolicy@wiltshire.gov.uk or telephone 01225 713223.


Yours faithfully/sincerely



Corporate Director
Growth, Investment and Place
Wiltshire Council

Appendix D - Wiltshire Council Website

Page 616



Local Development Scheme 2019

Home | Pay ▾ | Report ▾ | Apply ▾ | Services ▾ | News | **Salisbury** | Monitoring and Evidence | Accessibility | Contact

Local Development Scheme

Consultation on the Masterplan for The Maltings and Central Car Park, Salisbury

✓ **Consultation on Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document**

Wiltshire Council is consulting on a Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document (SPD), which has been prepared to support the Draft Wiltshire Housing Site Allocations Plan and the Wiltshire Core Strategy.

It is a strategy for considering the impacts of development in the Trowbridge area on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and sets out an approach for mitigation to avoid significant adverse impacts.

Consultation documents

The Draft Trowbridge Bat Mitigation Strategy SPD can be viewed and downloaded via the supporting documents tab in the [consultation portal](#), further information on how to comment can be found below.

Hard copies of these documents will also be available during normal opening hours at: Trowbridge, Bradford on Avon and Westbury libraries; and the main Council office in Trowbridge (County Hall).

How to comment

Comments are invited on the Draft Trowbridge Bat Mitigation Strategy SPD from Thursday 21 February until 5pm Thursday 21 March 2019.

Comments can be made:

Community Infrastructure Levy

Brownfield register


Statement of Community Involvement

Gypsy and Travellers

Contact Us

Privacy notice

Links



Contact us →

Contact Planning Policy



JOHNS
ASSOCIATES

Trowbridge Bat Mitigation Strategy SPD



Prepared in support of the
Wiltshire Housing Sites
Allocations Plan

January 2020

Wiltshire Council

Information about Wiltshire Council services can be made available in other formats (such as large print or audio) and languages on request. Please contact the council on 0300 456 0100, by textphone on (01225) 712500 or by email on customerservices@wiltshire.gov.uk.

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

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

وِلشائر کونسل (Wiltshire Council) کی سروسز کے بارے میں معلومات دوسری طرزوں میں فراہم کی جاسکتی ہیں (جیسے کہ بڑی چھپائی یا آڈیو ہے) اور درخواست کرنے پر دوسری زبانوں میں فراہم کی جاسکتی ہیں۔ براہ کرم کونسل سے 0300 456 0100 پر رابطہ کریں، ٹیکسٹ فون سے (01225) 712500 پر رابطہ کریں یا customerservices@wiltshire.gov.uk پر ای میل بھیجیں۔

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

DOCUMENT CONTROL

Document prepared for:

Wiltshire Council

Main contributors:



Jenny Bennett BSc MSc MCIEEM PIEMA

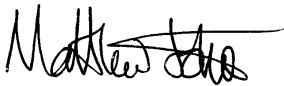
Technical Director



Ben Mitchell BSc (Hons) MCIEEM

Principal Ecologist

Reviewed by:



Matt Johns BSc MSc CEnv MCIEEM FGS MIFM

Director

Issued By

Ben Mitchell BSc(Hons) MCIEEM



Principal Ecologist

Johns Associates Limited, The Old Brewery, Newtown, Bradford-on-Avon, BA15 1NF

T: 01225 723652 | E: info@johnsassociates.co.uk | W: www.johnsassociates.co.uk

DOCUMENT REVISIONS

Version	Details	Date
V2	Revised to take account of comments from Wiltshire Council	13th September 2018
V3	Revised to take account of final set of comments from Wiltshire Council	4th December 2018
V4	Revised to include updated costings and feedback from Wiltshire Council	14th December 2018
V5	Revised to include final comments and addition of Map (Fig 2)	19 th February 2019
V6	Revised to include final comments for Council following the review of consultation responses. Figures 2, 4, 5, and 6 are subject to minor outstanding amendments for clarity following the conclusion of the examination into the Wiltshire Housing Site Allocations Plan.	27 th January 2020
V7	Final Version	12 th February 2020

Third party disclaimer

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by Johns Associates at the instruction of, and for use by, our client named on the front of the report. It does not in any way constitute advice to any third party who is able to access it by any means. Johns Associates excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.

TABLE OF CONTENTS

1	SUMMARY	1
2	INTRODUCTION	4
2.1	The Trowbridge woods and the SAC	4
2.2	Potential impacts to the SAC from development	6
3	WHY IS THERE A NEED FOR A TROWBRIDGE BAT STRATEGY?	7
3.1	Legislative Background.....	7
3.2	Policy background	8
3.2.1	National Planning Policy.....	8
3.2.2	Wiltshire Core Strategy	8
3.2.3	Wiltshire Housing Site Allocations Plan.....	10
3.2.4	Windfall and Neighbourhood Plan Sites	11
3.2.5	Wiltshire Council Bat SAC Guidance.....	11
3.2.6	Forthcoming Local Plan Review	12
3.2.7	The Evidence Base.....	12
4	WHAT THIS DOCUMENT SEEKS TO DO	13
5	BAT ECOLOGY	14
5.1	Bat Ecology – General	14
5.1.1	Impacts of lighting on bats.....	14
5.2	Bechstein’s Bat	15
5.2.1	(Cohen, Castlemead s.106 Ecology Monitoring Report 2018 surveys: Green Lane and Biss Woods , 2019)Ecology.....	15
5.2.2	Local context	18
5.3	Greater Horseshoe Bat.....	21
5.3.1	Ecology 21	
5.3.2	Local context	22
5.4	Lesser Horseshoe Bat	23
5.4.1	Ecology 23	
5.4.2	Local context.....	23
6	BAT SURVEY REQUIREMENTS FOR DEVELOPMENT	25
6.1	General survey requirements	25
6.2	Lighting survey	25
6.3	Surveys aimed at horseshoe bats	26
6.4	Surveys aimed at Bechstein’s bat.....	27
7	BAT SENSITIVITY ZONES	28
7.1	What do bat sensitivity zones mean?	28

- 7.2 How bat sensitivity zones have been derived.....32
- 7.3 Review of bat sensitivity zones32
- 8 ON SITE MITIGATION REQUIREMENTS 35**
- 8.1 Recommended Approach and Information Required for Planning Applications35
- 8.2 Standards for Habitat Mitigation Within the Site36
 - 8.2.1 General principles 36
 - 8.2.2 Hedgerows 41
 - 8.2.3 Woodlands 41
 - 8.2.4 Aquatic habitat..... 42
 - 8.2.5 Grasslands 42
- 8.3 Lighting42
 - 8.3.1 Illuminance Zones 43
 - 8.3.2 Prediction of post-development lighting conditions..... 43
 - 8.3.3 Lighting design solutions..... 44
 - 8.3.4 Monitoring of lighting 45
 - 8.3.5 Summary of Submission Requirements for Planning 45
- 9 OFF-SITE AND STRATEGIC MITIGATION 47**
- 9.1 Habitat Mitigation Measures – The Batscape.....47
 - 9.1.1 Delivery mechanism and implementation 47
 - 9.1.2 Developer contributions for strategic habitat mitigation 48
- 9.2 Recreational Pressure Mitigation.....48
 - 9.2.1 Recognising important bat woodlands as nature reserves 49
 - 9.2.2 Infrastructure enhancements to other greenspace sites 51
 - 9.2.3 Signage and interpretation at other greenspace sites 52
 - 9.2.4 Creation of additional green infrastructure (SANG)..... 53
 - 9.2.5 Developer contributions for strategic recreational pressure mitigation 53
- 10 BIBLIOGRAPHY 54**

1 SUMMARY

This Trowbridge Bat Mitigation Strategy (TBMS) is aimed at developers, consultants and planners involved in assessing development proposals in the landscapes in and surrounding Trowbridge.

The overall aim is to provide a clear and detailed approach to considering impacts of development in the Trowbridge area on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). This will help inform strategic planning for the area's future housing needs.

The landscape surrounding Trowbridge is known to be of high importance for bats, supporting at least 14 of the 18 UK bat species. This includes all four of the rarer UK species listed on Annex II of the Habitats Directive (European Council, 1992): greater horseshoe, lesser horseshoe, Bechstein's and barbastelle bats.

In particular, woodlands to the east and south east of Trowbridge are known to support a large and internationally-significant breeding meta-population of Bechstein's bat that is linked to the Bath and Bradford on Avon Bats SAC, including significant maternity colonies in Biss Wood, Green Lane Wood and Clanger and Picket Woods.

Significant potential effects to the SAC therefore include impacts to the foraging areas and commuting routes in the surrounding landscape used by the bats as well as roosts and can include:

- **Habitat degradation** – alteration / demolition / removal of a potential roost feature including changes to environmental conditions (temperature, humidity, internal light levels etc); loss, damage or change of management of potential foraging habitat; or removal / fragmentation / modification of habitats in a potential commuting corridor;
- **Lighting** – increased artificial lighting affecting potential roosting, foraging, commuting features as well as insect availability;
- **Noise and vibration** – construction / demolition activities close to potential roost features;
- **Recreational disturbance** – increasing the risk of recreational visits, both organised and informal. This can result in impacts such as: trampling of vegetation, leading to changes in species composition, loss of vegetation and erosion; disturbance from the presence of people and their activities; 'general' urban effects: dumping of waste, damage, vandalism, fires; and spread of plants including alien species.
- **Pollution** – dust and fumes close to potential roost features; and
- **Mortality** – e.g. predation by domestic cats at roost entrances, collision risk from road traffic and wind turbines.

The Wiltshire Core Strategy (Core Policy 29) anticipates a significant level of growth at Trowbridge over the period up to 2026, including 2,600 homes to the south-east of the town for a mixed-use allocation at Ashton Park. Moreover, the Wiltshire Housing Site Allocation Plan (WHSAP) proposes to allocate additional land for housing in order to support the strategy for the town and thereby help address the indicative housing requirements set out in Core Policy 29 of the Wiltshire Core Strategy. This document considers the requirements of new housing to be delivered under the WHSAP and in accordance with Core Policies 2 and 29 up to 2026.

It is essential that pre-application advice is sought at a very early stage through a formal pre-application request in order to understand how the Council Ecologists are approaching this matter and to reduce the risk of applications being unsuccessful or delayed. The necessary mitigation measures for bats will work when integrated as a fundamental component of the scheme design; but conversely, are unlikely to be successful when tacked on to a scheme retrospectively.

The areas to which this strategy applies are shown in Figure 4 and Figure 5. The key areas have been zoned according to the level and nature of bat sensitivity within each area.

This document has been created to address development in the Trowbridge area and in particular the WHSAP, the extents to which this strategy applies are therefore restricted to a combination of the Community Area and suitable buffer areas surrounding the strategic woodlands. Any development proposals outside of these zones, and therefore the scope of this document, will still be subject to detailed assessment in relation to the potential impacts on bats and will require separate mitigation measures independent of those described within this document. These mitigation requirements are beyond the scope of this document.

The requirements relating to each zone are:

RED ZONE

- new development unlikely to be granted permission

YELLOW ZONE - permission only likely to be granted in accordance with the development plan for Wiltshire

- Development proposals within this zone **must provide appropriate survey of bats** – see Section 6.
- Development proposals within this zone must **mitigate for all impacts on target bat species on site** through retaining and enhancing wide swathes of unlit bat habitat with associated buffer zones. Housing is expected to be provided at lower density to achieve this. Development areas and the area required for bat mitigation for each allocated site within the WHSAP have been estimated and are set out in Table 4. For each allocated site, it is anticipated that in most circumstances the full residual green space will be required for mitigation. See Section 8 for on-site mitigation requirements.
- Development proposals within this zone should expect to make a **payment for strategic habitat mitigation** – see Section 9.1

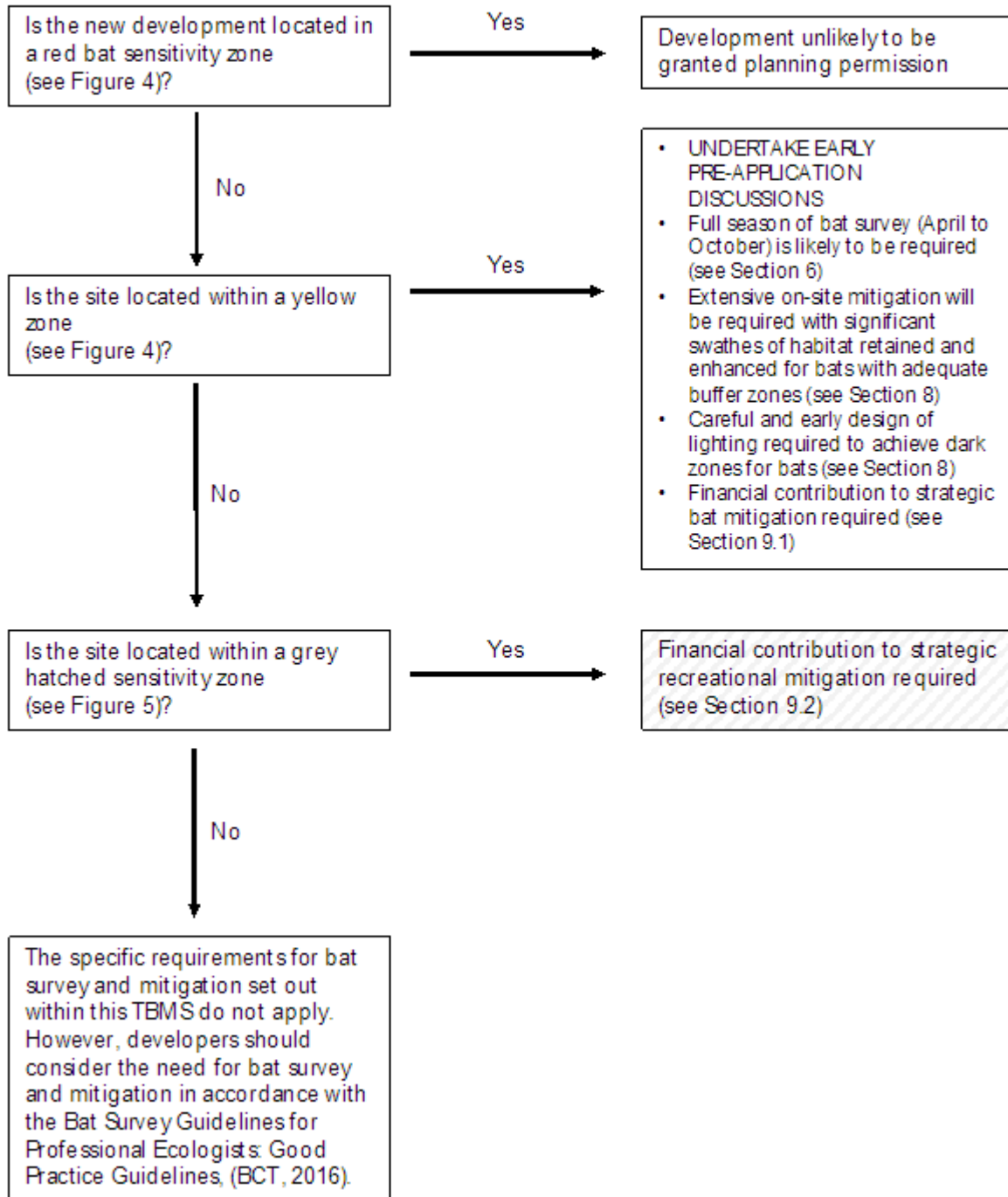
GREY (HATCHED) ZONE

- Development proposals within this zone should expect to make a **payment for recreational mitigation** – see Figure 5 and Section 9.2 As a minimum, the Footprint Ecology Report on recreational pressures in relation to the important woodlands that support the bats, states that (para 6.46) the outer limit of the zone of influence should comprise the settlements of Trowbridge and Westbury.

A flow chart summarising decision making and what is likely to be expected is presented in Figure 1 overleaf.

Figure 1 Decision Flowchart

FLOW CHART FOR NEW DEVELOPMENT IN THE TROWBRIDGE AREA



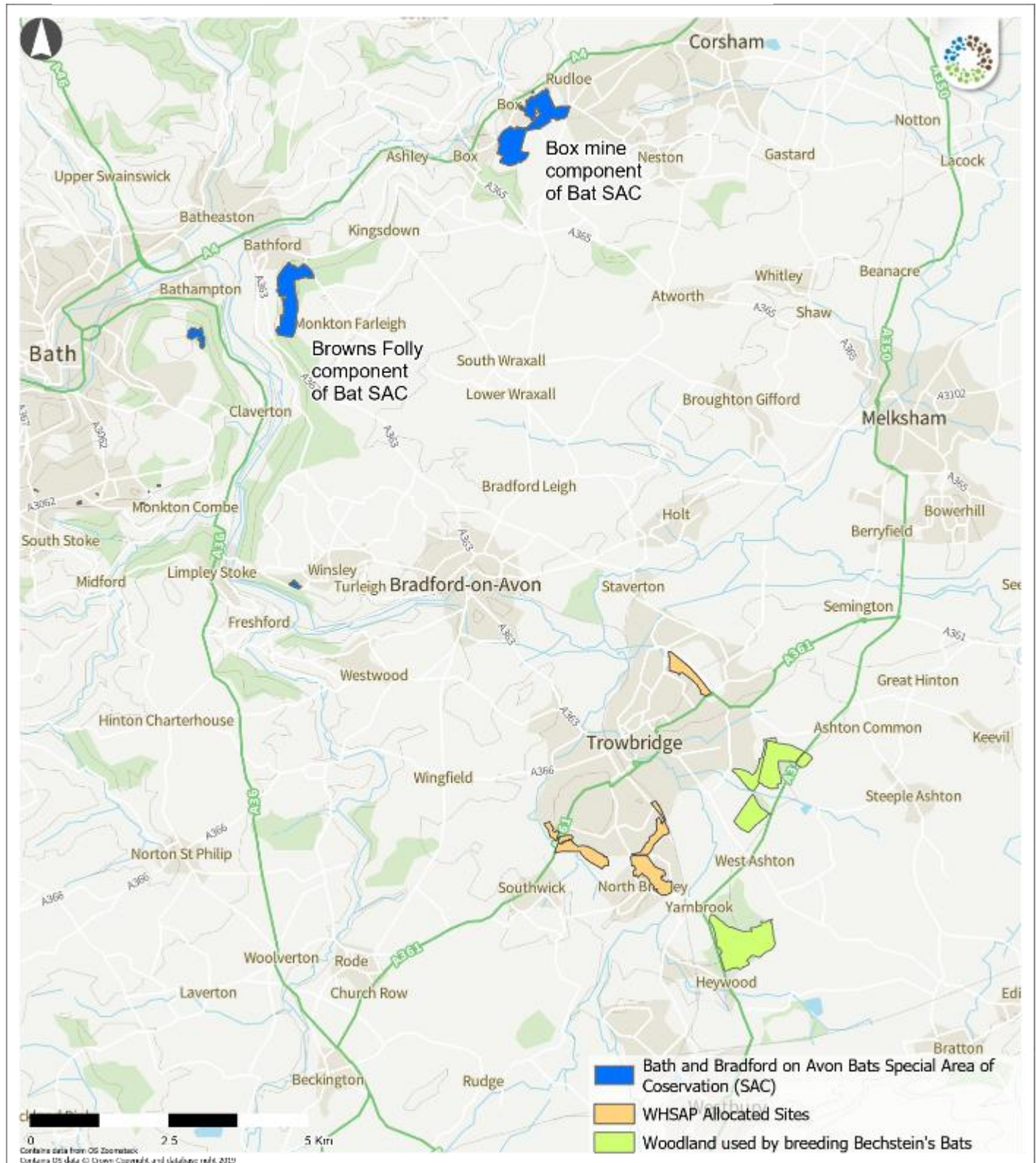
N.B. Financial contributions will be bound by the provisions of the CIL Regulations 2010 (as amended).

2 INTRODUCTION

2.1 The Trowbridge woods and the SAC

1. The landscape surrounding Trowbridge is known to be of high importance for bats, supporting at least 14 of the 18 UK bat species. This includes rarer UK species listed on Annex II of the Habitats Directive (European Council, 1992): greater horseshoe, lesser horseshoe, and Bechstein's bats.
2. In particular, woodlands to the east and south east of Trowbridge are known to support a large and internationally-significant breeding meta-population of Bechstein's bat, including significant maternity colonies in Biss Wood, Green Lane Wood and the woods extending to Clanger and Picket Woods (see Figure 3).
3. The meta-population of Bechstein's bats has been shown to be functionally linked to the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) located to the north west (see Figure 2). The SAC is designated for supporting internationally important populations of hibernating greater horseshoe, lesser horseshoe and Bechstein's bat. The internationally important designation of Bath and Bradford on Avon Bats SAC is comprised of a network of significant underground sites in both the Wiltshire and BANES administrative areas, including four nationally important Sites of Special Scientific Interest (SSSIs), namely Box Mine, Winsley Mines, Combe Down and Bathampton Down Mines, and Brown's Folly. These component sites comprise extensive networks of caves, mines and man-made tunnels which are used by bats for hibernation, breeding, mating and as a staging post prior to dispersal. Box Mine SSSI is also known to support a breeding colony of greater horseshoe bat. Figure 2 also illustrates the location of the allocations proposed in the Wiltshire Housing Site Allocations Plan (WHSAP) in the context of the SAC and woodlands.
4. The landscape surrounding Trowbridge is also known to be important for greater and lesser horseshoe bats, with roosts of conservation significance recorded in the area. It is highly likely that bat populations associated with these local roosts are also associated with the Bath and Bradford on Avon Bats SAC.

Figure 2 Location of Sites



2.2 Potential impacts to the SAC from development

5. The network of significant roosts for the species of bat associated with the SAC includes sites that are not covered by any statutory designation, including the breeding colonies of Bechstein's bats associated with the Trowbridge woods. The landscape surrounding all significant roost sites is critical to maintain the populations. Foraging areas used by bats vary between species and throughout the year, and include a wide range of habitats which support their invertebrate prey. Suitable semi-natural habitats such as woodlands, mature hedgerows, grazed pasture, rough grassland, watercourses and wetlands closest to bat roosts are most likely to be important to the bat populations, particularly for juveniles, however some species are highly mobile and may forage several kilometres from their roosts on a regular basis.
6. In order to migrate between the network of summer, winter and transitory roosts, autumn swarming sites and the commute to and from their numerous foraging areas, bats use established 'commuting corridors'. Although bats are capable of crossing (and frequently do cross) large open areas, good quality connective habitats are preferred. These are generally well vegetated, sheltered linear features that provide direct routes between foraging areas and roosts. They generally provide some protection from predators; and the sheltered conditions also ensure that the bats use less energy in flight rather than flying into the wind e.g. hedgerows, scrub along railway embankments.
7. Significant potential effects to the SAC therefore include impacts to the foraging areas and commuting routes in the surrounding landscape used by the bats as well as roosts and can include:
 - **Habitat degradation** - alteration / demolition / removal of a potential roost feature including changes to environmental conditions (temperature, humidity, internal light levels etc); loss, damage or change of management of potential foraging habitat; or removal / fragmentation / modification of habitats in a potential commuting corridor;
 - **Lighting** – increased artificial lighting affecting potential roosting, foraging and commuting features;
 - **Noise and vibration** – construction / demolition activities close to potential roost features;
 - **Recreational disturbance** – increasing the risk of recreational visits, both organised and informal. This can result in impacts such as: trampling of vegetation, leading to changes in species composition, loss of vegetation and erosion; disturbance from the presence of people and their activities; 'general' urban effects: dumping of waste, damage, vandalism, fires; and spread of plants including alien species.
 - **Pollution** – dust and fumes close to potential roost features; and
 - **Mortality** – e.g. predation by domestic cats at roost entrances, collision risk from road traffic and wind turbines.

3 WHY IS THERE A NEED FOR A TROWBRIDGE BAT STRATEGY?

8. The context for the WHSAP is essentially established by the adopted Wiltshire Core Strategy (WCS). Its primary purpose is therefore to help maintain a rolling five-year supply of housing across Wiltshire's three Housing Market Areas in accordance with the WCS.
9. The WCS (Core Policy 29) anticipates a significant level of growth at Trowbridge over the period up to 2026, including 2,600 homes to the south-east of the town for a mixed-use allocation at Ashton Park. Moreover, the WHSAP allocates additional land for housing in order to support the strategy for the town and thereby help address the indicative housing requirements set out in Core Policy 29 of the WCS.
10. Based on evidence gathered to date, one of the most significant challenges to delivering growth at Trowbridge is the presence of protected bat species and their habitat around the town. Habitats Regulations Assessment work undertaken to date in respect of the planned strategy for growth and recent planning applications, has identified potential risks to the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). These risks relate to direct loss of habitat used by bats for foraging and commuting; recreation pressure in woodlands and other spaces used by the bats for breeding and foraging; and in-combination effects of applications in the Trowbridge and wider area (e.g. cumulative effects of lighting). While recreation impacts relate mainly to proposed housing, direct impacts on habitats and cumulative effects also relate to other uses such as commercial and employment. As such, future development proposals at Trowbridge, be they planned or speculative, have the potential to adversely affect populations of Bechstein's, greater horseshoe and lesser horseshoe bat and therefore the designated features protected by the SAC designation that support these species.
11. This document seeks to address adverse impacts through avoidance and mitigation measures that ensure:
 - the capacity and permeability of the landscape to support foraging and commuting Bechstein's, greater horseshoe and lesser horseshoe is maintained (through a network of habitat enhancement, restoration and creation, including the opportunity to create new roosts). This mitigation will support the viability of the bat populations; and ensure that they are sufficiently robust to respond dynamically to landscape change.
 - adequate mitigation is provided for the increased recreational pressures to the core woodland sites that will result from additional residential development. This will be aimed at diverting people away from the woodland sites to alternative countryside sites and will comprise: development exclusion zones around the woodlands; improved management of the woodland sites themselves; and improvements to the recreational opportunities (away from the woods) available to the residents of Trowbridge. As a minimum, the Footprint Ecology Report on recreational pressures states that (para 6.46) the outer limit of the zone of influence for recreational pressure should comprise the settlements of Trowbridge and Westbury (see Figure 5).
12. This Strategy has therefore been written to set out at a strategic level the mitigation that will be required in association with development to be confident that significant adverse effects to the SAC are avoided.

3.1 Legislative Background

13. The Bath and Bradford on Avon Bats SAC (the SAC) is a European Site designated under the Habitats Directive 92/43/EEC (European Council, 1992), which is transposed into UK law under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) (UK Government, 2017). The [Citation](#) that supports the SAC designation represents a formal description of the reasons why the site has been designated for its conservation importance. SACs are afforded stringent legal protection under Regulation 63 of the Habitats Regulations. The legal protection conferred to SACs is complex, however, in summary, permission cannot be granted for development which will adversely affect the integrity of a SAC unless the conditions of three prohibitive tests (the 'derogation tests') are met. When deciding whether the integrity of a SAC would be adversely affected by development, the legislation requires the application of the precautionary principle, i.e. where there is 'reasonable scientific doubt' as to whether an adverse effect on the integrity of the site would occur, development should not be permitted (unless the three derogation tests are met).

14. Regulation 63 of the Habitats Regulations requires the decision-taker (or 'Competent Authority') to undertake a strict step-wise assessment process for any plans or projects to ascertain potential impacts on European Sites and whether the 'integrity' of the European Site will be adversely affected. This assessment process is known as 'Habitats Regulations Assessment' (HRA). It is important to note that HRA must be applied to 'plans' as well as 'projects'. This means that strategic local plan documents (including the Wiltshire Core Strategy and the WHSAP) must be subject to HRA as well as individual developments which are subject to planning applications. In practice, HRA at the strategic 'plan' level enables more meaningful consideration of potential 'in-combination' impacts; and means that strategic mitigation can be applied effectively to deal with such cumulative effects.
15. A series of [Conservation Objectives for the SAC](#) have been published for the Bath and Bradford on Avon Bats SAC, which provide a statutory framework for decision making in respect of development proposals and therefore help inform 'HRAs undertaken at the plan and project (planning application) level. In addition, they are to be used to inform the design and delivery of mitigation measures deemed necessary to conserve or restore the SAC and/or to prevent the deterioration or significant disturbance of its qualifying features as required by the provisions of Article 6(1) and 6(2) of the Habitats Directive. The Site Improvement Plan prepared for the SAC by Natural England identifies an action for planning authorities to produce and promote guidance to inform strategic planning and enable developers to take full account of the SAC in their schemes. The Trowbridge Bat Mitigation Strategy helps to fulfil this priority requirement.

3.2 Policy background

3.2.1 National Planning Policy

16. National planning policy is set out within the National Planning Policy Framework (NPPF) (UK Government, 2019). The NPPF is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment.
17. Paragraph 174 of the NPPF requires planning policy to plan for biodiversity at a landscape-scale across local authority boundaries. Planning policy should identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation. Paragraph 170 requires planning policy and decisions to minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
18. Paragraphs 171, 174, 176 and 177 underline the overriding importance of European sites and removes the presumption in favour of sustainable development (paragraph 11) where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.

3.2.2 Wiltshire Core Strategy

19. The development plan for Wiltshire provides the starting point for the consideration of development proposals within the county. It comprises a suite of documents including the adopted WCS (Wiltshire Council, 2015). The WCS presents a strategy for how Trowbridge will grow over the period 2006 to 2026 and anticipates significant levels of housing to be built as set out above.

Table 3.1 Delivery of Housing 2006 to 2026 (Trowbridge Community Area) based on completions, developable commitments

	Indicative housing requirement 2006-2026	Less Completions 2006 - 17	Less Developable commitments	Indicative remaining requirement	calculations Sum B+C+D	
Trowbridge Town	6,810	-3,019	-1,561	2,230	2,230	
Remainder	165	-256	-32	0 ⁽¹⁾	-123	
Community Area (CA) total	6,975	-3,275	-1,593	2,107 ⁽²⁾	2,107	Shortfall against CS predicted housing supply
[1] The actual delivery from completions and existing commitments for the CA remainder will be in excess of the indicative requirement by 123 dwellings						
[2] This figure takes into account the 123 dwellings to be delivered in excess of the indicative requirement for the CA remainder.						

20. The policies of the development plan need to be read as a whole. For Trowbridge, the context for development is essentially established by Core Policies 1 (Settlement Strategy), 2 (Delivery Strategy), 28 (Trowbridge Central Areas of Opportunity) and Core Policy 29 (Spatial Strategy: Trowbridge Community Areas) of the WCS. These provide the direction for how the town will change through the Plan period up to 2026.
21. The WCS include a strategic allocation for 2600 homes, the Ashton Park Urban Extension to the south-east of Trowbridge. Whilst the focus for planned housing delivery is upon Ashton Park, there remains a requirement for further housing as part of Core Policy 29 to be delivered over the period to 2026. Core Policy 29 states that it would be the role of the forthcoming Development Plan Document (the WHSAP) to identify and allocate further land for additional housing at the town. The extent of the indicative residual requirement is significant (approximately 2,107 houses) as set out within the Council's housing land supply information - see Table 1 above¹.
22. Core Policy 50 within the WCS provides protection for features of biodiversity and geological value. As a result of Core Policy 50, development potentially affecting the Bath and Bradford on Avon SAC must provide avoidance and mitigation measures to ensure no adverse impact on integrity of the site. Core Policy 50 also requires development to be undertaken in accordance with the Wiltshire Council Bat SAC Guidance (Wiltshire Council, September, 2015).
23. Provision of a coherent and linked landscape for bats is also in accordance with Core Policy 52, which requires development to make provision for the retention and enhancement of the local green infrastructure network. This includes the requirement to identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire.
24. A HRA of the WCS was undertaken during its preparation (WSP, February, 2012) (WSP, March 2013) (Wiltshire Council, April 2014). The HRA concluded, with agreement from Natural England, that in principle the general quantum of

¹ Source: Topic Paper 3 Housing Land Supply Addendum (July 2018)

development at Ashton Park could be delivered without having an adverse effect upon the integrity of the local Bechstein's bat populations, subject to sensitive design and incorporation of mitigation measures identified in the Development Template included in the WCS. Subsequently, the Council resolved to grant outline planning permission for this site on 25 April 2018 subject to the prior completion of a Section 106 legal agreement. The application was subject to comprehensive ecological survey and assessment dating back to 2013 (Pegasus Group, August, 2017). The HRA undertaken for this site (Wiltshire Council, February, 2018) concluded that the range of mitigation to be provided for lesser horseshoe and Bechstein's bat and the mechanisms proposed to secure it were sufficient to remove any doubt that the Council may otherwise have had as to the absence of adverse effects on the integrity of the Bath and Bradford on Avon Bats SAC. As such, Wiltshire Council concluded that the project (as proposed in planning application 15/04736/OUT) would not have an adverse effect on the integrity of the Bath and Bradford on Avon Bats SAC, either alone or in combination with other plans and projects. As a consequence, no further mitigation is required over and above the bespoke mitigation scheme already proposed for Ashton Park as secured by the section 106 agreement for that development.

25. However, the HRA of the WCS (Wiltshire Council, April 2014) could not reasonably assess the effects of the remaining houses to be provided at Trowbridge as part of Core Policy 29 as those effects will be dependent upon the location, scale and nature of the development sites, which was unspecified within the WCS. Core Policy 29 therefore stipulates that provision of additional dwellings requires further assessment of effects on protected bat species and their habitats to ensure they are properly safeguarded. The HRA therefore concluded that the effects of the additional housing to be provided within the Trowbridge Community Area should be further assessed under the HRA accompanying the relevant subsequent planning document which allocates such land (the WHSAP – see below).

3.2.3 Wiltshire Housing Site Allocations Plan

26. The WHSAP which is due to be adopted in February 2020 is being prepared to support the delivery of housing within Wiltshire by helping to address the residual indicative WCS housing requirements. At Trowbridge, the WHSAP identifies specific development sites in order to provide greater certainty that the indicative housing requirement in Core Policy 29 can be achieved by 2026.
27. The WHSAP proposes to allocate six sites that will deliver approximately 1050 new homes on greenfield land over the plan period to 2026. These proposals have been rigorously tested through Sustainability Appraisal (SA) and HRA.
28. The HRA for the Pre-Submission Draft Wiltshire Housing Site Allocations Plan (Wiltshire Council, June, 2017) concluded that:
- ‘Recent evidence has shown that housing expansion on the eastern edge of Trowbridge is generating increased visitor pressure at ancient woodlands which support an important colony of Bechstein's bats associated with the SAC. Further allocations at the town could exacerbate this, particularly when considered in combination with planned growth such as the Ashton Park Urban Extension. The options closest to the woodlands, and therefore most likely to contribute to the number of visits, have been removed from the plan and the Council is currently preparing a Trowbridge Recreation Management Mitigation Strategy to address any residual effects in relation to this issue. It is therefore concluded that the plan would not have an adverse effect upon the SAC through increased recreational pressure, subject to the implementation of that mitigation strategy.’
29. In addition, the subsequent Addendums to the HRA (Wiltshire Council, May, 2018), (Wiltshire Council, September 2018) as well as the Final HRA (February 2020) conclude that allocations at Trowbridge are within areas likely to be used by bat populations associated with the Bath and Bradford on Avon Bats SAC. The allocations are likely to contain habitat features used by these species and development could lead to their deterioration through physical loss as well as lack of or inappropriate habitat management and higher ambient light levels. These effects potentially become more significant when the effects of the plan are considered as a whole due to the potential for significant loss and deterioration at a landscape scale.

30. This document, the TBMS (Trowbridge Bat Mitigation Strategy formerly referred to as the Trowbridge Recreation Management Mitigation Strategy), sets out the mitigation measures required by the HRA and designed to ensure no adverse impact on the important bat populations associated with the Trowbridge landscape due to the WHSAP (and therefore no adverse impact on the integrity of the Bath and Bradford on Avon Bats SAC).

3.2.4 Windfall and Neighbourhood Plan Sites

31. The Wiltshire Housing Land Supply Statement demonstrates that there have been a series of historic windfall housing sites approved for Trowbridge within the urban area. To-date, relevant planning applications have been determined in accordance with the Wiltshire Council Bat SAC Guidance (Wiltshire Council, September, 2015) (see below) to ensure each development provides appropriate mitigation for bat populations associated with the SAC.

32. However, in terms of the mitigation required for bat populations associated with the Trowbridge landscape, the historic picture with respect to windfall developments and the potential identification of new greenfield sites through neighbourhood plans or application of rural exception policies at its surrounding villages has three main implications:

- Windfall development is expected to continue for the Trowbridge area for the foreseeable future;
- Windfall sites have the potential to add to the cumulative pressures on the local bat populations. Greenfield development sites may contribute to both habitat and recreational pressures while pressures from brownfield housing sites are most likely to be restricted to recreational pressures alone;
- Therefore, new sites must be catered for in the mitigation to be specified within this document.

33. This strategy will therefore provide guidance for sites coming forward as rural exceptions sites under core policy 44 and through neighbourhood planning. The location and number of such dwellings is difficult to predict and therefore a precautionary approach must be taken towards their mitigation. While the numbers coming forward can be expected to be relatively limited, all such sites will be subject to assessments to ensure compliance with the TBMS and the Habitats Regulations.

34. Development of commercial, employment and other non-residential schemes will also be subject to bespoke assessments. The principles established in this strategy for mitigating habitat loss will apply equally to such schemes but, depending on the nature of the scheme, their effects on recreational pressure are expected to be less significant.

3.2.5 Wiltshire Council Bat SAC Guidance

35. The Wiltshire Bat SAC guidance (Wiltshire Council, September, 2015) has been prepared jointly by Natural England (NE), Wiltshire Council and local experts and researchers. It is aimed at applicants, agents, consultants and planners involved in producing and assessing development proposals in the landscapes surrounding Wiltshire's most sensitive bat roosting sites which are protected by European wildlife legislation. The Wiltshire Bat SAC guidance sets out a requirement for adequate survey information, mitigation and compensation for bats in order to demonstrate that development proposals will not impact on the designated bat populations. The guidance applies to all types of development that are subject to planning control.

36. The Wiltshire Bat SAC guidance explains how development activities can affect Wiltshire's bat SACs and what must be done to avoid or mitigate any impacts. It aims to flag up the types and locations of development that present risks to the SACs so that the needs of bats can be taken into consideration as early as possible in order to avoid unnecessary delays to development projects.

37. This document must be read and interpreted alongside the Wiltshire Council Bat SAC Guidance. It has been written to complement the Guidance; **and does not supersede the policy requirements contained therein.**

3.2.6 Forthcoming Local Plan Review

38. Wiltshire Council has commenced the process of reviewing the WCS which identifies land for development for the period to 2026 (Wiltshire Council, November, 2017). The future document will be named the Wiltshire Local Plan and will identify additional land for development to meet housing requirements for the period 2016 to 2036.
39. The Wiltshire Local Plan Review is in its early stages and no decisions have yet been made on the future locations for growth and development. However, Trowbridge may need to accommodate additional new homes in rolling forward the plan period to 2036. It will be critical that assessment of impacts on important bat populations and provision for essential mitigation measures is factored in to any future allocation of housing for Trowbridge. It is intended that the scope and direction of travel for the TBMS will evolve to set out the mitigation required for Trowbridge bat populations in association with proposals in the Wiltshire Local Plan.

3.2.7 The Evidence Base

40. The evidence base on which this document has been founded includes the sources listed below:
 - Bat data compiled from existing ecological consultant's survey reports, which have been submitted in support of a variety of planning applications for individual developments;
 - Extensive bat surveys undertaken in support of the Ashton Park planning application 15/04736/OUT, including radio-tracking of ten Bechstein's bats associated with Green Lane and Biss Woods in 2013 (Pegasus Group, August, 2017). Volume Two of the Environmental Statement includes an analysis of Bechstein's bat data for the local area compiled from a variety of sources, including historic surveys within Green Lane and Biss Wood undertaken by Wiltshire Bat Group and historic data from the Westbury Bypass planning application in 2005/06 (Aspect Ecology, August 2017);
 - Shadow Habitats Regulations Assessments undertaken by DTA Ecology on behalf of Wiltshire Council relating to the Ashton Park planning application 15/04736/OUT (DTA Ecology, Oct 2016) (DTA Ecology, July, 2017);
 - Habitats Regulations Assessments undertaken by Wiltshire Council of the WCS and HSAP; and of the Ashton Park planning application 15/04736/OUT (WSP, February, 2012) (WSP, March 2013) (Wiltshire Council, April 2014) (Wiltshire Council, June, 2017) (Wiltshire Council, February, 2018) (Wiltshire Council, May, 2018);
 - Data obtained from the Wiltshire and Swindon Biological Records Centre (WSBRC);
 - Evidence and views obtained from a small consultative group of local expert batworkers;
 - Castlemead S106 Ecology Monitoring reports undertaken at Green Lane and Biss Woods in 2014, 2015, 2016 (Cohen), 2017 (Cohen), (Cohen, Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016, 2017) (Cohen, Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2017, 2018) (Cohen, Castlemead s.106 Ecology Monitoring Report 2018 surveys: Green Lane and Biss Woods , 2019).
 - Further contextual information on the key bat species in Wiltshire and the Trowbridge area taken from the Wiltshire Mammal Atlas (Harris, March 2017); and
 - A Footprint Ecology Report (Footprint Ecology, November 2018) was commissioned by Wiltshire Council to consider recreation pressures on the nature conservation interest of woodland near to Trowbridge. The report includes the findings from a visitor survey of the East Trowbridge woods and other Trowbridge greenspaces, including information on levels of current use of different sites, why people choose different sites and what management might work to influence and change people's access patterns. The report also presents the results from semi-structured interviews with selected stakeholders to supplement the information from the face-face survey, to understand current issues with management of the woods and opportunities. Finally, the report contains a literature review which identifies issues relating to recreation use/urban effects on woodlands, focusing on bats and also reviews particular approaches to mitigation (exclusion zones and alternative greenspace).

4 WHAT THIS DOCUMENT SEEKS TO DO

41. The TBMS is aimed at developers, consultants and local authority planners involved in assessing development proposals in the landscapes in and surrounding Trowbridge.
42. The overall aim is to provide a clear and detailed approach to considering impacts of development in the Trowbridge area on the Bath and Bradford on Avon Bats SAC. This will help inform strategic planning for the area's future housing needs.
43. The strategy will comprise a component of the development management process, to be considered in line with relevant policies listed above. It should be read alongside the Wiltshire Bats SAC Guidance (Wiltshire Council, September, 2015), or later revision of the same, and seen as a detailed local supplement to this document.
44. This version of the TBMS has been prepared to support the WHSAP and development in accordance with Core Policies 2 and 29. It is also intended that the scope and direction of travel for this document will evolve alongside the emerging Local Plan Review.
45. The status of the strategy as a Supplementary Planning Document (SPD) will help influence and provide guidance on the acceptability of development, including proposed mitigation. The National Planning Policy Framework (glossary) defines SPD as: *“Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan”*. Accordingly, this strategy is intended to provide further detail and guidance with respect to Core Policies 29 (Spatial Strategy: Trowbridge Community Areas) and 50 (Biodiversity and Geodiversity) within the Wiltshire Core Strategy.
46. This strategy sets out:
 - spatial areas (or Bat Sensitivity Zones) where development could have an effect on the SAC and trigger the requirements of the Habitat Regulations. It is those areas to which this strategy relates.
 - survey requirements for bats and lighting that will be expected for development proposals located within the Bat Sensitivity Zones.
 - basic mitigation standards and principles that will be expected for development proposals located within the Bat Sensitivity Zones.
 - requirements for landscape-scale, strategic mitigation to support development proposals, covering both the impacts on core bat habitat; and recreational pressures on key bat sites. Key measures are identified, together with any funding required to implement the strategic mitigation.
 - the mechanism for implementation of strategic mitigation – namely developer contributions via section 106 legal agreement or through Community Infrastructure Levy (CIL) payments.
47. This strategy is based on best practice and learning from similar areas such as North Somerset and Mendip Bats Special Areas of Conservation (SAC) guidance (North Somerset Council, January 2018) and the best scientific information available at the time of writing the strategy. It has been developed with input from Natural England and will be kept under review with updates issued in light of new evidence coming forward.
48. Throughout this document the term 'core bat habitat' is used to distinguish habitat which has been shown through surveys, or is otherwise assumed, to be used by one or more of the SAC bat species and which is therefore required to be retained, protected and buffered in accordance with this strategy. It also refers to habitat which is proposed to be created as a mitigation or enhancement for SAC species. 'Bat habitat' is used more broadly to refer to any habitat which may be used by any species of bats, the importance of which will require separate specific assessment but is not a key consideration within this strategy.

5 BAT ECOLOGY

5.1 Bat Ecology – General

49. Bats have a complex life-cycle in which they rely on a network of different sites for roosting throughout the year. Hibernation and maternity roosts are the most critical, but a series of other “transitory” roosts are also used as bats move around from one area to another, using different food sources from a variety of habitats as the seasons unfold. “Swarming” sites where bats congregate for socialising and mating in the autumn (and to a lesser degree also in spring) are also vitally important for maintaining populations. The roost network used by the SAC species throughout the year can include a wide range of features including:
- Mines, shafts and adits
 - Caves
 - Culverts and tunnels
 - Buildings – particularly loft voids and cellars
 - Trees – rot holes, flaking bark, woodpecker holes
50. Foraging areas used by bats vary between species and throughout the year and include a wide range of habitats which support their invertebrate prey. Suitable semi-natural habitats such as woodlands, mature hedgerows, grazed pasture, rough grassland, watercourses and wetlands closest to bat roosts are most likely to be important to the bat populations, particularly for juveniles, however some species are highly mobile and may forage several kilometres from their roosts on a regular basis.
51. In order to migrate between the network of summer, winter and transitory roosts, and commute to and from their numerous foraging areas, bats use established ‘commuting corridors’. Although bats are capable of crossing (and frequently do cross) large open areas, good quality connective habitats are preferred. These are generally well vegetated, sheltered linear features that provide direct routes between foraging areas and roosts. They generally provide some protection from predators; and the sheltered conditions also ensure that the bats use less energy in flight rather than flying into the wind. Such connective linear habitat includes:
- Hedgerows, stone walls and tree lines
 - Woodland edges and scrub belts
 - Riparian corridors e.g. rivers, stream, brooks, canals etc
 - Embankments and cuttings e.g. railways, roads, visibility bunds etc.
- 5.1.1 Impacts of lighting on bats
52. Artificial lighting is known to have severe impacts on bats, acting through a range of different mechanisms (Stone E. , 2013). Light falling on a bat roost exit point, regardless of species, will at least delay bats from emerging, which shortens the amount of time available to them for foraging. As the main peak of nocturnal insect abundance occurs at and soon after dusk, a delay in emergence means this vital time for feeding is missed. At worst, the bats may feel compelled to abandon the roost. Bats are faithful to their roosts over many years and disturbance of this sort can have a significant effect on the future of the colony.
53. In addition to causing disturbance to bats at the roost, artificial lighting can also affect the feeding behaviour of bats and their use of commuting routes. There are two aspects to this: one is the attraction that short-wave length light (UV and blue light) has to a range of insects; the other is the presence of lit conditions.
54. Many night-flying species of insect are attracted to lamps that emit short wavelength component (Bruce-White, 2011). Studies have shown that, although noctules, serotines, pipistrelle and Leisler’s bats, take advantage of the concentration of insects around white street lights as a source of prey, this behaviour is not true for all bat species. The slower flying, broad-winged species, such as long-eared bats, barbastelle, greater and lesser horseshoe bats and the *Myotis* species

(which include Brandt's, whiskered, Daubenton's, Natterer's and Bechstein's bats) generally avoid external lights (Bat Conservation Trust, 2009).

55. This means that light that spills onto bat commuting routes or foraging areas can cause avoidance behaviour by some light-sensitive species (including greater horseshoe, lesser horseshoe and Bechstein's) and isolate or fragment habitat in the landscape (Stone E. , 2013). This will mean that bats may be forced to abandon foraging areas or commuting routes for sub-optimal habitat (which may ultimately result in abandonment of roosts if that alternative habitat is insufficient to sustain the colony). Lighting can be particularly harmful if it illuminates important foraging habitats such as river corridors, woodland edges and hedgerows used by bats. Studies have shown that continuous lighting along roads creates barriers which some bat species cannot cross (Fure, 2012).
56. It is also known that insects are attracted to lit areas from further afield. This could result in adjacent habitats supporting reduced numbers of insects, causing a further impact on the ability of light-avoiding bats to feed.
57. The introduction of new lighting is therefore a significant issue for greater horseshoe, lesser horseshoe and Bechstein's bats.

5.2 Bechstein's Bat

58. The information on Bechstein's bat ecology and local distribution has been obtained from several main sources:
 - Aspect Ecology (August 2017) (within Pegasus Group, Ashton Park, Trowbridge Environmental Statement Volumes 1 & 2). Report in respect of Bechstein's Bats (including results of the 2013 radio-tracking study).
 - Harris, G and Purgle, L (March 2017). Wiltshire Mammal Atlas Second Edition.
 - Cohen, K. (2017). Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016.
 - Cohen, K. (2018). Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2017.
 - (Cohen, Castlemead s.106 Ecology Monitoring Report 2018 surveys: Green Lane and Biss Woods , 2019)

5.2.1 (Cohen, Castlemead s.106 Ecology Monitoring Report 2018 surveys: Green Lane and Biss Woods , 2019)Ecology

59. A medium-sized bat, with a grey-brown dorsal surface and pale belly, the Bechstein's bat is usually easily distinguished from other species by the very long ears which extend beyond the nose when pushed forwards over the muzzle. The Bechstein's bat inhabits wooded landscapes across Europe, from southern England to central Europe and the Balkans, east to the Black Sea, Iran and the Caucasus, typically utilising broad-leaved woodlands, often with watercourses.
60. The Bechstein's bat is considered generally rare throughout its Great Britain range, sparsely distributed, and considered one of Great Britain's rarest mammals in part due to genuine scarcity but also a result of difficulties in achieving reliable surveys. In Great Britain, the species is restricted to southern England, with strongholds in southern counties, including Sussex, Hampshire and Dorset. British populations appear to favour mature deciduous woodlands with a high proportion of oak and ash species (Greenaway and Hill, 2004; Hill and Greenaway, 2008; Schofield and Mitchell-Jones, 2010), which offer a variety of natural roosting opportunities as well as providing important foraging habitat for this species; typically, larger woods are strongly favoured. However European populations also adopt beech woods and conifer woodlands where adequate under-storey is present.
61. The Bechstein's bat is difficult to differentiate from the other Myotis species through acoustic surveys and so trapping surveys with acoustic lures (such as the Sussex Autobat, Hill & Greenaway, 2005) are considered the most reliable survey method. This led to the national Bechstein's Bat Project, coordinated by Bat Conservation Trust, building upon the pilot studies of Dr David Hill and Frank Greenaway (Miller, 2011). In 2015 a joint postgraduate research project was launched by Exeter University and Vincent Wildlife Trust as a result of concerns over inbreeding of isolated populations (Wright, 2018). Whilst genetic diversity was found to be generally high across the species range, a differentiation was also found to exist between the northern and southern part of the Bechstein's range in the UK. The study reports that the absence of obvious

physical barriers such as mountain ranges between both populations suggests that anthropogenic barriers may explain the differentiation. These two projects under pin current knowledge about Bechstein's ecology in Britain.

5.2.1.1 Summer roosts

62. The Bechstein's bat typically spends the summer and breeds in roosts within woodlands, using cavities such as woodpecker holes and bat boxes. In addition, bats are rarely recorded roosting in buildings. Bechstein's bats have also been recorded roosting within hedgerow trees. Palmer et al. found such hedgerow trees to be well used even by maternity groups close to Grafton Wood where there are thought to be ample suitable potential roost cavities (Palmer, 2013). More recent studies associated with the Trowbridge woodlands and Bere Forest in Hampshire have also found maternity colonies associated with mature trees outside of woodlands (Keith Cohen *pers com*; Tristan Norton *pers com*).
63. Maternity colonies range from 10-50 females, rarely to 100 bats, exhibiting fission-fusion societies, i.e. they subdivide and recombine frequently, changing roosting sites every few days. The frequent splitting and regrouping means that at any one time the breeding colony is split between more than one roost and an occupied roost may not contain all the members of the colony. This strategy allows Bechstein's bats to be flexible according to roost availability and suitability, colonising a number of smaller roosts, where necessary. Radio-tracking studies have recorded Bechstein's bats switching roosts every 2-3 days (Schofield and Morris, 2000) although results of radio-tracking at Green Lane Wood suggest the maternity can remain in the roost for longer (Cohen 2017, Cohen 2018, Cohen *pers. comm.*). A single maternity colony can use up to 50 different roosts within a maternity season (Koenig, 1999). Male Bechstein's bats typically roost individually or travel to different maternity roosts every year (Greenaway and Hill, 2004).
64. At a landscape scale, the location of roost sites appears to be broadly dictated by distance to individual foraging sites (see below). Bechstein's bats show strong fidelity to individual foraging areas, returning to the same sites on consecutive nights and even years regardless of roosting location (Kerth G., 2001) and as such, roosting sites are often located close to foraging habitat, minimising travel distance and therefore reducing the energetic cost of commuting between roosts and foraging areas (*ibid.*)

5.2.1.2 Summer home range and foraging behaviour

65. Bechstein's bats have been recorded foraging mainly in deciduous woodland with a closed canopy (Schofield and Morris, 2000; Fitzsimons et al., 2002; BCT, 2011). Preferred woodland foraging habitats used by Bechstein's include those with a predominance of oak and ash in the woodland canopy, a dense understory with a predominance of native species including hazel and hawthorn and large areas of contiguous woodland (either in one block or several smaller connected areas), of at least 25ha (Bat Conservation Trust, 2013). This estimate of 25ha as a minimum viable range has been taken from this model which assumed a minimum viable population of 25 breeding females each requiring 1ha of foraging territory.
66. A number of studies have also recorded foraging sites to be located within woodland in close proximity (up to 1 km) of water (Schofield and Morris, 2000; Fitzsimons et al., 2002, BCT, 2011). Bats have also been shown to use overgrown hedgerows and tree lines for foraging (Schofield and Mitchell-Jones, 2010). Recent radio-tracking studies at the Forest of Bere in Hampshire found that bats were also regularly foraging over grazed pasture and within conifer plantations (Tristan Norton, *pers com*). That Bechstein's bats forage beyond the confines of the roost woodland, utilising the wider landscape, has been replicated by a number of recent radio tracking studies (e.g. Palmer et al., 2013 in Worcestershire and Cohen 2017, 2018, 2019 in Trowbridge).
67. In order to exploit all of the foraging resources available, Bechstein's bats forage throughout the vertical strata of the woodland or mature tree line, from close to the ground to high up in the canopy, catching insect prey both during flight (aerial hawking) and through gleaning invertebrates from the surface of vegetation (Schofield and Morris, 2000; Altringham, 2003; Dietz et al., 2007; Schofield and Mitchell-Jones, 2010). The diet of Bechstein's bats changes throughout the season according to prey availability, whilst faecal analysis has recorded evidence of moths, beetles, crane flies, grasshoppers, dung flies, lacewings and non-flying arthropods such as spiders (Wolz, 1993, referenced in Kerth et al.,

2001a; Altringham, 2003; Dietz et al., 2007). The presence of dung flies in the diet of Bechstein's bat also lends weight to the use of grazed pasture (potentially in a parkland setting) by foraging Bechstein's bat (Tristan Nortan, *pers com*).

68. Individual Bechstein's bats typically forage within their own distinct core foraging territories, largely but not always separate from those of neighbouring bats (Kerth et al., 2001a; Greenaway and Hill, 2004). As a result, some Bechstein's bats will travel greater distances from the same roost, through areas of suitable foraging habitat, in order to reach their own individual core foraging site. Studies have thus recorded bats travelling on average between 0.5km and 1.5km from roosts to foraging sites, although distances of up to 4km have been recorded in some instances (Steinhauser, 2002; Boye and Dietz, 2005) and by bats radio tracked as part of the monitoring study undertaken for the Castlemead development at Trowbridge (Cohen, Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016, 2017)
69. Research on foraging Bechstein's bats in the UK has recorded a range of different core foraging ranges, from 0.08ha in a 156ha deciduous woodland in Sussex up to 103.27ha in Worcestershire (Fitzsimons et al., 2002; Palmer et al., 2013). Studies in extensive deciduous woodlands in Europe, which may represent optimum habitat conditions, have recorded smaller territory sizes of approximately 20 ha (Kerth et al., 2001a).

5.2.1.3 Flightlines

70. Studies in Sussex (Greenaway and Hill, 2004; Hill and Greenaway, 2006) reported that female Bechstein's bats generally stay under the canopy of woodland and dense hedgerows when commuting and foraging, which is consistent with the behaviour of other bat species (Entwistle et al., 1996; Brandt et al., 2007). However, radio-tracking studies in Wiltshire (Cohen 2017, 2018, 2019) Dorset (Schofield and Morris, 2000), the Isle of Wight (Ian Davidson-Watts, *pers.comm.*), and Worcestershire (James Hitchcock / Eric Palmer, *pers. comm.*) have reported observations of bats moving directly across open fields or farmland when travelling from, or returning to, roost sites and foraging areas.
71. In addition, a number of studies in the UK have recorded Bechstein's bats crossing roads, including the A422 in Worcestershire (Palmer et al., 2013) and the A350 in Trowbridge (Cohen 2017, 2018, 2019). Radio-tracking studies undertaken in woodlands in the vicinity of Trowbridge, including Green Lane Wood and Biss Wood, have recorded bats crossing the A350 (Laurence, 2003; Laurence, 2007, Aspect Ecology, August 2017, Annex 4). Although Bechstein's bats have been recorded crossing roads, there is evidence that for larger roads, such as motorways there may be a barrier effect (Kerth and Melber, 2009). In the vicinity of such roads, it is likely the retention of cluttered habitat is particularly important, to maintain habitat linkages.

5.2.1.4 Hibernation roosts

72. During winter in the UK, a small number of Bechstein's bats have been recorded hibernating in caves and mines. However, hibernating Bechstein's bats are rarely observed within the SAC mines, and it is unclear if these mines are a main hibernation site for them, although some individuals are likely to be hidden from view in narrow and inaccessible crevices. It is thought that Bechstein's bat is likely to utilise both underground sites (mines, caves, etc.) and woodland hibernation sites, such as deep holes or cavities within deciduous trees, and thus may remain in the breeding woodlands all year round.

5.2.1.5 Autumn swarming

73. In autumn, Bechstein's bats travel to swarming sites (which may be located some distance from their habitual summer foraging areas). There is evidence to suggest that swarming behaviour is a mating event (Kerth et al., 2002), where bats will chase one another, particularly at cave or mine entrances which are known hibernation sites for the species. The reason for swarming behaviour in bats is not fully understood. However, theories include social learning (i.e. swarming behaviour teaches juveniles to become familiar with suitable winter roost sites); and increasing genetic diversity (i.e. congregation of bats at autumn swarming increases the number of potential mates, which provides opportunities for genetic mixing between populations). Bechstein's bats tagged at swarming have been recorded returning to their maternity sites at the end of the night, rather than being temporarily resident near / at the underground sites (Dekeukeleire, 2016).

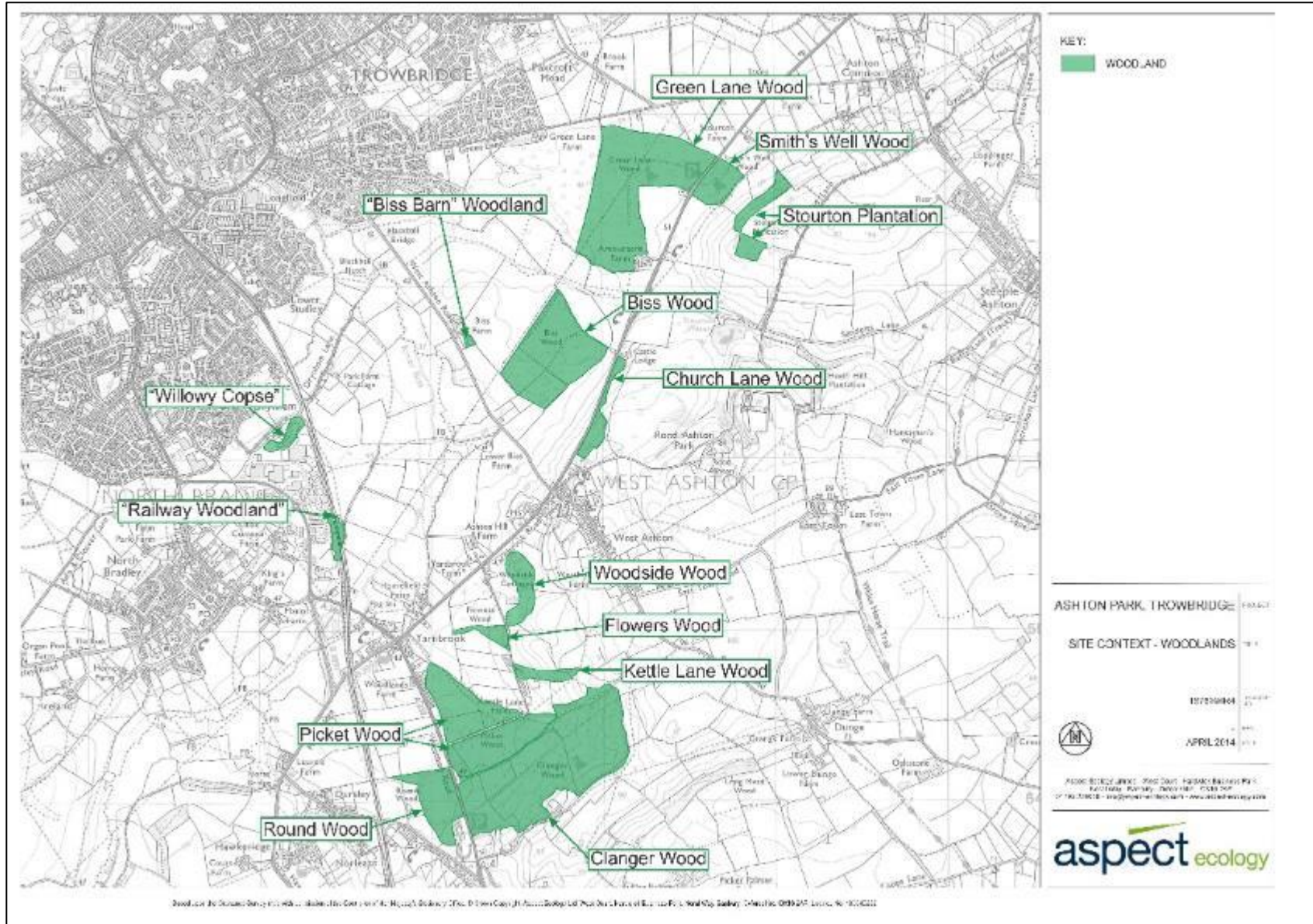
5.2.2 Local context

74. Records of Bechstein's bat within Wiltshire include a number of hibernating bats within a series of caves and mines in the West of Wiltshire located approximately 8 - 12km from Trowbridge (JNCC, 2011). These caves also support large numbers of hibernating greater horseshoe and lesser horseshoe bats and as such have been designated as the Bath and Bradford on Avon Bats SAC. Hibernating Bechstein's have also been recorded in Chilmark Quarries SAC.
75. Box Mine SSSI (a component site of the Bath and Bradford on Avon Bats SAC) is also an important site for swarming Bechstein's which is likely to be frequented by bats whose core ranges are a considerable distance from the site. Bechstein's bats are regularly recorded during autumn swarming trapping surveys at a range of stone mines within the Bath & Bradford on Avon Bat SAC (40 records amounting to a total of 184 individual Bechstein's bats trapped and ringed during this time). Whilst the swarming function is not a qualifying feature of the SAC, it is nonetheless a vital element of the ecology of Bechstein's bat.
76. Ringing records obtained from Dr Danielle Linton have confirmed links between bats swarming at Box Mine and three additional sites in Wiltshire (the maternity colonies at Green Lane and Biss Woods, Trowbridge; and a roost at Drews Pond Wood Local Nature Reserve (LNR), Devizes). These ringing records confirm a functional link between the Bechstein's bat roosts in Green Lane and Biss Wood and the Bath and Bradford on Avon Bats SAC; and it is therefore inferred that Bechstein's bats annually migrate between the SAC and other hibernation and breeding sites that constitute the wider SAC network. Other swarming sites such as Gripwood, that are not part of the SAC, are also recorded as being visited by ringed Bechstein's bats from Green Lane and Biss Woods (Linton / Cohen *pers. comm.*); individual populations of swarming bats of other species have been found to have high fidelity to individual swarming sites and as such each site has value to a distinct bat population (Dekeukeleire, 2016).
77. Wiltshire has seen extensive study in recent years on Bechstein's bats, focused in particular upon the breeding populations at Trowbridge, particularly the long-term studies at Green Lane Wood and Biss Wood, following their discovery here in 1999. A summary of the known habitat use and behaviour of the Bechstein's bat population in the Trowbridge area is provided below, mostly taken from the Aspect Ecology Environmental Statement (amended in 2017) (Pegasus Group, August, 2017):
- A number of tree roosts (most commonly woodpecker holes and rot holes) and bat box roosts have been recorded during radio tracking studies. The majority of these were located within woodland blocks, however, some day roosts were recorded outside the main woodlands, the most notable of which comprised a hedgerow tree located some 500m north of Green Lane Wood (with 100+ bats recorded emerging in 2016) (Cohen, Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2017, 2018) (Cohen, Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016, 2017) (Cohen, Castlemead s.106 Ecology Monitoring Report 2018 surveys: Green Lane and Biss Woods , 2019).
 - Based on the observed regular use of roosts, together with the recorded ranging distances of individual bats and the flight behaviour of radio tracked bats, it is considered likely that the Bechstein's bats in the local area belong to several 'sub-colonies' associated with particular woodlands, namely Green Lane Wood-Stourton Plantation; Biss Wood; Church Lane; Woodside Wood; Clanger Wood; Round Wood; and Picket Wood (see Figure 3 below);
 - The sub-colonies appeared to form relatively distinct female maternity groups. However, low levels of sub-colony mixing were recorded, with individuals recorded to move between various woodlands during the 2013 radio-tracking study and from previous survey work undertaken by other parties (as reported in Aspect Ecology (August 2017) e.g. Laurence, 2003; Laurence, 2004; Billington, 2006; Laurence, 2007). On this basis, all of the sub-colonies are considered likely to form one large and semi-linked meta-population across the local area and the local population is conjectured to be between 350 and 700 bats (Aspect Ecology, August 2017). Natural England has confirmed that this is one of the largest known Bechstein's breeding populations in the country and on this basis is currently considering whether to notify the woodlands as SSSI. It is possible that further sub-colonies which form part of the larger meta-population may be discovered with further research work. For example, radio tracking by the Wiltshire Bat Group during the period 2003 to 2006 also found Bechstein's tree roosts at Kennel Wood, wooded copses associated with Rood Ashton Manor and near East Town;

- The recorded summer home ranges for radio tracked bats in the Trowbridge landscape in 2013 are particularly large in comparison to those reported in other radio-tracking studies in Worcestershire, Sussex and Dorset (recorded as an average of 150 ha, although ranging from 35 to 445 ha for individual bats) (Fitzsimons et al., 2002; Palmer et al., 2013). Further, the size of core foraging and feeding ground range was also recorded to be markedly higher, averaging 6.18ha and 55.52ha, respectively. Bats will only utilise as much habitat as is necessary to meet their foraging needs; and the larger summer ranges recorded for this population are likely to be due to the fragmented and sub-optimal nature of the wooded landscape, forcing bats to expand their summer home and foraging ranges in order to meet their foraging needs;
- The majority of foraging was recorded within and immediately adjacent to woodlands in the local area. However, the radio tracked bats were also recorded to make use of non-woodland habitats for foraging in the form of the River Biss corridor and occasionally hedgerows, varying in structure and composition, ranging from relatively dense outgrown hedgerows to box-cut hedges; two bats also foraged over cattle in farm sheds. Two bats radio tracked in 2016 travelled as far north as the Kennet and Avon Canal and spent time foraging along the canal (Cohen, Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016, 2017)
- The results of the radio-tracking study undertaken in 2013 indicate overlap in core foraging areas, between several bats. There is research evidence to suggest that there is a direct link between relatedness and the level of overlap of core foraging areas, indicating maternal inheritance of core foraging areas (Kerth et al., 2001a). On this basis, the considerable overlap in core foraging areas recorded, could indicate relatedness between the bats concerned. However, overlapping home ranges could also be an indication of the limitations of local foraging habitats;
- In 2013, relatively high-level foraging use of 'Willow Copse' (a young deciduous plantation woodland, likely to have originated from the 1980s) was made by one radio tracked bat. Similar use of a young plantation sycamore copse to the north west of East Town was recorded by a female Bechstein's bat radio tracked in September 2003 by Wiltshire Bat Group. The level of use made of such young plantation woodland raises the possibility that Bechstein's bats can gain significant sustenance from such small young new woodlands, a finding which could have important benefits for the maintenance and enhancement of this species at this site and across its range;
- Radio tracked Bechstein's bats in 2013 were recorded as using a range of (predominantly linear) habitat features for commuting, including the River Biss corridor, hedgerows, tree lines, woodland edges and the railway line. All linear features comprised dark unlit corridors. The linear features are likely to be important to provide connectivity between areas of optimal woodland habitat, such that the Bechstein's bats are likely to utilise these linear features out of necessity to maintain sufficient summer home ranges and to access the optimal roosting and foraging habitat available;
- All ten radio tracked Bechstein's bats in 2013 were recorded to cross roads, including the A350. The majority of individuals in this study were recorded to commute along linear features, in the form of hedgerows and tree lines, leading up to the A350. As well as crossing the unlit A350, Bechstein's bats were recorded to cross Bratton Road in West Ashton, lit by orange, low pressure sodium lights. In 2016 and 2017, bats were regularly recorded crossing Ashton Road adjacent to the junction with Green Lane, and in 2016 two bats also crossed the A361 east of Trowbridge (Cohen, Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016, 2017)
- Radio tracking studies have shown foraging and night-roost use of parkland and hedgerow trees, mainly mature oaks, within fields near to the core woods (<1km) (Cohen, Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2017, 2018) (Cohen, Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016, 2017) Similar observations have been recorded by other recent radio tracking studies e.g. at Grafton Wood (Palmer, 2013)

Figure 3 Woodland habitat utilised by the local Bechstein's 'meta-population', reproduced from (Aspect Ecology, August 2017) Reproduced with permission from Persimmon Homes Wessex.

Page 642



5.3 Greater Horseshoe Bat

5.3.1 Ecology

78. The following information on greater horseshoe bat ecology and local distribution has been obtained from two main sources:
- Harris, G and Purgle, L (March 2017). Wiltshire Mammal Atlas Second Edition; and
 - North Somerset Council (January 2018). North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document
79. The horseshoe bats can be distinguished from other British bats by the 'noseleaf', which is thought to act as an 'acoustic lens', focusing echolocation pulses that are emitted from the nose. The greater horseshoe bat is the largest European horseshoe species. When roosting, they hang free with the wings enfolding their body, resembling small pears. They are long-lived animals and individuals have been known to live for up to 30 years. Greater horseshoe bats were originally cave dwellers, but most maternity colonies today are in buildings, choosing sites with large entrance holes which the bats can fly through with access to open roof spaces warmed by the sun. Greater horseshoe bats require a number of night roosts in the landscape near to the maternity roost (usually up to 4 km, but exceptionally up to 14 km) for resting between foraging bouts.
80. In winter, the greater horseshoe bat uses a series of caves, disused mines, cellars and tunnels as hibernation sites. These sites can be some distance from the breeding roost (> 50 km). Hibernation is interrupted between once a day and once every 6-10 days (depending on the temperature and time of year) to feed near the cave entrance or change roost site. Transitional roosts used during the spring and autumn are important staging posts for the population moving between breeding and hibernation roosts.
81. Greater horseshoe bats require a diverse habitat mosaic, including:
- **grazed pastures** are critical foraging habitat for greater horseshoes. Cattle are preferred to smaller grazers, since they create the ideal structural conditions for perch-hunting bats in hedgerows and woodland edge. Large dung beetles, *Geotrupes* spp., can provide a major dietary component of greater horseshoe bats. Most favour cattle dung, but some also use sheep dung; and *Aphodius* dung beetles live in cow, sheep and horse dung. Short grazed habitat, such as produced by sheep, also benefits *Melontha* and *Tupilid* species which require short grass to oviposit. Within 1 kilometre of the roost the presence of permanent grazed pasture is critical for juvenile greater horseshoe bats. A high density of grazing animals should be present giving high presence of dung.
 - **mature semi-natural woodlands** including riparian woodland. Rides and footpaths are used by greater horseshoe bats when flying in woodland feeding areas. Grassy rides and glades in woodland increase the range of food and provide opportunity for perch hunting. Woodland supports high levels of moth abundances. Macro (and micro) moths are densest where there is grass or litter, less so where there are ferns, moss, bare ground or herbs. They are richer where there is native tree diversity and trees with larger basal areas. Species such as oak, willow and birch have large numbers of moths, whereas beech has small numbers even when compared to non-native species such as sycamore. Uniform stands of trees are poorer in invertebrates than more diversely structured woodland.
 - **other grasslands**, including meadows kept for hay and silage; and flower-rich grasslands on road verges, grassy embankments and brownfield sites. Longer swards benefit the larvae of noctuid moths, for example, the main moth species eaten by greater horseshoe bats associated with the maternity roost at Woodchester Mansion, Gloucestershire are all species associated with grassland habitats, including large yellow underwing, small yellow underwing, heart and dart and dark arches (Ransome, 1997);
 - **scrub**, for example, Billington (Billington G. , 2000) recorded frequent foraging use of scrub habitat, particularly Buddleia scrub within disused quarries, during radio tracking carried out for the Mells Valley SAC in June. However, large areas of continuous scrub are likely to be avoided by greater horseshoe bats.

- **well-developed hedgerows or lines of trees.** Larger hedgerows are required for commuting as well as foraging. Substantial broad hedgerows with frequent emergent trees can provide suitable structure for foraging conditions for greater horseshoe bats if woodland is scarce; and
 - **watercourses.** Tipulid larval development is favoured by damp conditions. Therefore, any aquatic environments and/or marshes can provide a secondary prey source. Aquatic environments could also favour the production of caddis flies in certain months, such as May and late August / September when other food supplies may be erratic. There is significant caddis fly consumption at roosts close to extensive river or lake habitats (Ransome, 1997). Extensive use of the Bristol Avon by greater horseshoes was recorded during radio tracking in the Bradford on Avon area (Fiona Mathews, pers. com.); and in Devon the River Dart, a large river system, mostly banked by broadleaved woodland was also found to be a key habitat (Billington G. , 2003).
82. These habitats are not used consistently throughout the year but change with the seasons. Woodlands and pasture adjoining wood are used in spring and early summer. As summer progresses, feeding switches to areas further away and tends to be fields used for grazing cattle and other types of stock. Meadows that have been cut and where animals are grazing are also used. A balance of woodland and pasture of about 50% and 50% provides optimum resources for greater horseshoe bats.
83. Dietary analysis of greater horseshoe bat droppings shows that this species is conservative in its food sources and there are three main prey items: cockchafer *Melolontha melolontha*; dung beetles *Aphodius* sp. (Coleoptera: Scarabaeidae); and moths (Lepidoptera). Of these moths form the largest part of the diet but the other two are important at certain times of year. Three secondary prey sources are also exploited: crane flies (Diptera: Tipulidae), ichneumonids (Hymenoptera: Ichneumonidae) of the *Ophion luteus* complex, and caddis flies (Trichoptera)
84. The preferred key prey in April for all bats that have survived the previous winter is the large dung beetle *Geotrupes*. In May, the preferred key prey is the cockchafer *Melolontha melolontha*. In June and early July, pregnant females feed on moths, their key prey at that time, and continue to do so after giving birth, until late August. Moth supplies usually fall steadily in August and September, due to phenological population declines, or rapidly at a particular dawn or dusk due to temporary low temperatures. If either happens, adult bats switch to secondary, single prey items, or combine moths with them. In very cold spells ichneumonids, of the *Ophion luteus* complex are consumed. They are common prey in October and through the winter as they can fly at low ambient temperatures.
85. Juvenile bats do not feed at all until they are about 29 or 30 days old, when they normally feed on *Aphodius rufipes*, which is their key prey. This dung beetle species is a fairly small (90mg), easily-caught and usually abundant prey, which reaches peak numbers at the time that the young normally start to feed in early August.
86. Favoured prey is caught on the wing or by gleaning prey from the surface of vegetation; flight is typically slow and often low above the ground. Greater horseshoe bats also frequently use a 'sit and wait' tactic whilst hanging from twigs and small branches within the vegetation, 'watching' from a regular perch and flying out to take passing insects.

5.3.2 Local context

87. The following information has been taken from Mammals in Wiltshire, Second Edition (Harris, March 2017) with supplementary local contextual information added where appropriate.
88. Only two maternity roosts are currently confirmed in Wiltshire at the time of writing (September, 2018): one in Box Mine SSSI and the other at a residential property in Westbury Leigh. Note that Iford Manor SSSI lies adjacent to the county boundary, just outside Wiltshire – this is one of the largest maternity colonies in Great Britain.
89. During 1996-2016 over 4100 records of greater horseshoe bats had been submitted, of which over 3500 records relate to hibernation counts at Bath and Bradford-On-Avon Bats SAC and a lesser number at Chilmark Quarries SAC. Ongoing hibernation counts at sites within, and associated with, the Bath and Bradford-on-Avon SAC, coordinated by Dr Fiona Mathews and Wiltshire Bat Group, have confirmed that these sites continue to support significant numbers of greater horseshoe bats, and furthermore, ringing studies are now providing an insight into how individuals move regularly

between sites during the winter. An approximate total of 19 separate hibernation sites (the large Box Mine complex has been treated as a single site) are represented in the records. Low numbers have been captured at some of these hibernation sites during autumn swarming surveys indicating that they are also used as mating and/or transitional roosts. Box Mine SSSI is also subject to more detailed monitoring, formerly by Ian Davidson-Watts, latterly by Roger Martindale, whose more extensive surveys of the complex yield higher counts at this location. Sites monitored in the Bath and Bradford on Avon SAC offer a 10-year peak mean of 414 greater horseshoe bats, with Box Mine SSSI supporting the majority of these. Peaks between winters and sites vary according to weather conditions and disturbance, with Box Mine alone ranging from 6 to 629 bats recorded during the period 2005/06 to 2015/16. More detailed analyses are required so these figures are provisional.

5.4 Lesser Horseshoe Bat

5.4.1 Ecology

90. The lesser horseshoe bat is the smallest European horseshoe species and when roosting they hang free with the wings enfolding their body, resembling small plums. Lesser horseshoe bats mainly roost in buildings that allow uninterrupted flight access during the summer months, often with stone walls and slate roofs. Maternity roosts are typically associated with buildings that offer a range of microclimates (e.g. attics, cellars and chimneys), thus allowing bats to shift location depending on the external temperature. Lesser horseshoe bats hibernate during the winter in underground caves, mines and cellars, which are humid and range between 4-12 degrees Centigrade. Hibernation roosts are typically within 5km of the maternity roost (maximum known distance 32km away).
91. Lesser horseshoe bats are specialised for foraging in cluttered environments, particularly woodlands, wooded riparian corridors, and mature treelines and hedgerows, feeding within or below the canopy, mainly taking small flying insects including diptera (flies including midges, gnats and dung flies), tipulids (crane flies) and lepidoptera (moths). Landscapes which are of most importance for lesser horseshoe contain a high proportion of woodland, parkland and grazed pasture, linked with linear features, such as overgrown hedgerows.
92. Woodland, particularly broad-leaved woodland, comprises the most important foraging habitat for lesser horseshoe bat. However, radio tracking research (Cresswell Associates, 2004) shows lesser horseshoe will forage over pasture, but cattle must be actively grazing the field. Once cattle are removed from a field foraging by lesser horseshoe bats ceases immediately. However, pasture in such use offers a valuable and predictable food source at a time of year when bats are energetically stressed (pre- to post-weaning), because they are feeding their young. Scatophagidae (dung flies) can be one of the major prey categories in the diet of lesser horseshoe bats; and the larvae of the yellow dung-fly *Scatophaga stercoraria* develop in cattle dung. The presence of pasture is also indispensable to the larval stage of development for certain species (Tipulids), which form a significant proportion of the prey hunted by lesser horseshoe bats.
93. Lesser horseshoe bats fly an average of 2km per night from roosts during the summer. Band widths for foraging lesser horseshoe bats during the summer are derived from radio tracking studies. Knight (Knight, 2006) found that the maximum distance travelled in one night in a lowland area in North Somerset was 4.1km for an adult female and 4.5km for a nulliparous female. The mean maximum range was 2.2km. Bontadina et al (Bontadina, 2002) found a similar maximum foraging range; and recommended that conservation management should be concentrated within 2.5km of the roost with special consideration within 600 metres of the roost where the colony foraged half the time.
94. Lesser horseshoes exhibit multi-modal behaviour and fly for just over 50% of the night, resting after each foraging bout in night roosts, which appear fundamental to the conservation of lesser horseshoe bats, particularly during pregnancy and lactation (Knight, 2006).

5.4.2 Local context

95. The following information has been taken from Mammals in Wiltshire, Second Edition (Harris and Linham, 2017) with supplementary local contextual information added where appropriate.

96. During 1996-2016 a total of 925 records of lesser horseshoe bats had been submitted, of which 186 relate to hibernation counts at sites within the Bath and Bradford-On-Avon Bats SAC and 23 at Chilmark Quarries SAC. Ongoing hibernation counts continue at sites within, and associated with, the Bath and Bradford-on-Avon SAC, coordinated by Dr Fiona Mathews and Wiltshire Bat Group. Of the records from the Bath and Bradford-on-Avon Bats SAC, Box Mine SSSI supports significant numbers of hibernating lesser horseshoe, with hundreds of bats regularly recorded. Several other disused limestone quarry hibernation sites feature in the records in the vicinity of the Bath and Bradford on Avon Bats SAC.
97. Forty-eight of the recorded roosts within Wiltshire comprised maternity roosts of which several were in the area around Bradford on Avon, Corsham and Trowbridge (thereby close to known hibernation sites). The recent finding near Green Lane Wood of a ringed lesser horseshoe bat ringed during swarming surveys at Gripwood in Bradford-on-Avon (referenced in Cohen, 2017), suggests there may be a functional link between the SAC and woodlands around South Trowbridge for lesser horseshoe bats.

6 BAT SURVEY REQUIREMENTS FOR DEVELOPMENT

98. The Wiltshire Council Bat SAC Guidelines (2015) set out general requirements for bat surveys in association with development and these should also be referred to. A series of additional survey requirements that must be adhered to within the area covered by this Strategy have been set out below.

6.1 General survey requirements

99. Early support and engagement with ecological consultees (including Wiltshire Council and Natural England) is critical to ensure that survey and mitigation scope are adequate. Use of the Council's pre-application service is recommended.
100. Within all Bat Sensitivity Zones (see Section 7 below), a licensed bat ecologist should be commissioned to carry out a preliminary visit and desk study to assess the risk and the need and scope of further survey work. **NB note that development of new sites in the Red Bat Sensitivity Zone is unlikely to be acceptable due to high impacts on the bat SAC populations – see Section 7 below.**
101. All bat survey work should be undertaken in accordance with the BCT Bat Surveys: Good Practice Guidelines. (Bat Conservation Trust, 2016).
102. Bat surveys are seasonally constrained. A substantial suite of surveys may take up to 12 months to complete and should therefore be programmed into the project delivery plan at an early stage to avoid delays.
103. Mating sites are often overlooked. A single bat in a roost is often considered to be of low conservation value, but actually could be essential to the favourable conservation status of the population if it is a male. Surveys in April and October can be critical to establishing whether the roost is a mating site and it may be necessary to trap bats to establish gender.

6.2 Lighting survey

104. Some of the technical information in this section has been reproduced with the kind permission of Bath and North East Somerset Council from their Waterways Design Guidance Protecting Bats in Waterside Development (Bath and North East Somerset Council, 2018).
105. In addition to the guidance set out in this section, it is expected that the approach to lighting for new development, including lighting survey, is undertaken in accordance with the guidance in (Bat Conservation Trust and Institution of Lighting Professionals, 2018) and (Gazaryan, S., and Meyer-Cords, T. (Eds) (2018).
106. The introduction of new lighting can result in adverse impacts to populations of Bechstein's, greater horseshoe and lesser horseshoe bat. It is therefore critical to maintain functional dark foraging habitats and commuting corridors for these species. In order to achieve this alongside new development, it will be essential that the bats and lighting issue is acknowledged and integrated into the design process from the outset, and in an iterative way. It should not be left to later design stages or be retrofitted into development proposals. In order to demonstrate that the development has been designed to accommodate light-sensitive bats, it will be necessary to provide the baseline lighting survey and modelling information set out below.
107. Early consultation with Wiltshire Council is required to establish the need for surveys of existing light levels on the proposed development site, however, it is anticipated that baseline lighting surveys will be required for all allocated sites within the WHSAP. An understanding of baseline illuminance levels will allow accurate comparisons to be undertaken during post development monitoring and compliance checks.
108. Where baseline lighting surveys are confirmed to be required in consultation with the Council, they must be undertaken by a suitably experienced and competent lighting professional (member of the Chartered Institution of Building Services Engineers (CIBSE), Society of Light and Lighting (SLL), Institution of Lighting Professionals (ILP) or similar). The lighting

professional should determine the appropriate number and location for sample readings to be taken, taking into account the habitats of value to bats on site and the potential need for the samples to be repeated post-development as closely as possible.

109. Baseline measurements should be taken systematically across the site or features in question. That is, they will need to be repeated at intervals to sample across the site or feature, either in a grid or linear transect as appropriate. At each sample location, a reading should be taken at ground level on the horizontal plane (to give illuminance hitting the ground). Vertical readings should also be taken at each sample location at 1.5m (to replicate the height at which horseshoe bats will typically fly); and at 4m (to replicate the height at which Bechstein's bats will typically fly). The orientation for vertical readings should be perpendicular to the surface/edge of the habitat feature in question (such as a wall or hedgerow) in order to produce a 'worst case' reading. Further measurements at other orientations may prove beneficial in capturing influence of all luminaires in proximity to the feature or principal directions of flight used by bats. This should be discussed in pre-application discussions with Wiltshire Council.
110. An appropriately high-quality light meter must be used which is V-Lambda and Cosine Corrected and the type of light meter used for the survey must be specified in a baseline survey report (e.g. Minolta T10). Measurements should always be taken in the absence of moonlight, either on nights of a new moon or heavy cloud to avoid artificially raising the baseline. Baseline surveys must be undertaken with all existing luminaires switched on and undimmed, and where possible, with all internal lighting switched on and with blinds or screens over windows removed. Where possible, measurements should be taken during the spring and summer when vegetation is mostly in leaf, in order to accurately represent the baseline during the principal active season for bats and again to avoid artificially raising the baseline.
111. A horizontal illuminance contour plan (isolux plot) should be prepared by the lighting professional, plotted at ground level. Vertical illuminance contour plots for 1.5m above ground level and at 4m above ground level, or similar graphic representations of illuminance levels showing light spill on vertical planes, will also need to be submitted with the planning application. Each contour plan should be accompanied by a table showing their minimum and maximum lux values.

6.3 Surveys aimed at horseshoe bats

112. Following the initial site visit and desk study by a licensed bat ecologist (see 6.1 above), early consultation with Wiltshire Council is recommended to confirm the need for, and scope of, surveys aimed at horseshoe bats. Horseshoe bat surveys are likely to be required for any development of greenfield sites within the yellow bat sensitivity zones, including all proposed allocations within the Housing Sites Allocation Plan. Where required, horseshoe surveys should be undertaken in accordance with the specifications listed below.
113. All surveys aimed at horseshoe bats must be designed and undertaken by a qualified ecological consultant (employed by the developer) with experience of greater and lesser horseshoe survey and mitigation. A suitably experienced and licensed bat ecologist must produce and sign off the final bat report to be submitted with the planning application.
114. It is expected that all potential roost structures for horseshoe bats will be subject to visual inspections and dusk emergence/ dawn re-entry surveys in accordance with the BCT Bat Surveys: Good Practice Guidelines. (Bat Conservation Trust, 2016).
115. As a minimum, extensive static detector surveys will be required for any development in the yellow or red Bat Sensitivity zones identified in Section 7 below. Intensive survey effort in combination with appropriately positioned, high sensitivity microphones and devices that record in full spectrum format will be necessary to ensure that greater and lesser horseshoe bat will be detected (if present) (both species are more difficult to detect compared to most other British bat species due to the directionality and rapid attenuation of their echolocation calls). The primary objective of these surveys will be to detect commuting routes and foraging areas rather than roosts. Enough static detectors need to be deployed to monitor all potential flyways (particularly linear habitat features) but also to sample all habitats within the development site, including open grasslands, woodland edge, woodland canopy, woodland shrub layer etc. The period of deployment at

each location will be at least 50 days from April to October and will include at least one working week in each of the months of April, May, June, July, August, September and October (50 nights out of 214 ≈25%). Full details of equipment used as well as photographic evidence with a supporting diagram showing detection radii for horseshoe bats should be submitted to demonstrate that the site has been adequately surveyed.

116. As a minimum, manual transect surveys in any of the Bat Sensitivity Zones will require: manual transect surveys to be carried out on ten separate evenings. At least one survey will be undertaken in each month from April to October, as the bat's movements vary through the year. Transects will cover all habitats likely to be affected by the proposed development, including a proportion away from commuting features in field.

6.4 Surveys aimed at Bechstein's bat

117. Bechstein's bats are associated most frequently with tree roosts. The local population has been shown to use trees outside the main woodland blocks for day and night roosting, as well as foraging, including a hedgerow tree that supports the largest recorded emergence count for any of the known maternity roosts. A number of tree roosts used by Bechstein's bats in the UK have also been found in small trees e.g. with a DBH (diameter at breast height) as low as 13cm (Andrews Ecology Ltd, 2017) and DBH of 8.5cm at Green Lane Wood (Keith Cohen *pers comm*).
118. As such, all planning applications for development affecting trees within the bat sensitivity zones, either through direct loss or via indirect impacts such as lighting or fragmentation, must be supported by comprehensive bat tree surveys aimed at establishing the presence and conservation significance of tree roosts. In the first instance, this must comprise a thorough ground-based assessment, undertaken by a suitably experienced bat ecologist, to categorise any trees with potential to support roosting bats. Where trees are at risk, tree surveys should follow the Bat Roosts in Trees methodology (Bat Tree Habitat Key, 2018). Any such trees should be subject to endoscope surveys potentially with multiple inspections over the year given the well-known low encounter rates of bats using tree roosts and climbing surveys, as relevant, by an appropriately licensed bat ecologist. Further emergence and re-entry surveys of affected trees may be required, and early consultation with Wiltshire Council is advised to agree the full scope of tree surveys. **Unoccupied potential roost features are as important as occupied features. Wherever possible, trees in the early mature phase or older should be retained within the dark habitat network for bats regardless of whether they contain potential roost features as it is important to retain continuity of the future roosting resource, as well as foraging resource.**
119. The Bechstein's bat is difficult to differentiate from the other *Myotis* species through acoustic surveys. In addition, the bat echolocates very quietly, frequently from high in the canopy, and can often be missed during acoustic surveys. This means that standard acoustic survey techniques are **not** adequate to detect the likely presence or absence of this species from a development site.
120. Survey techniques for Bechstein's bat typically involve trapping surveys (using mist nets and harp traps) with acoustic lures. Further advanced survey techniques such as radio tracking may also be deployed to assess which habitat features in the landscape are used for foraging and commuting. However, due to the low density of this species and lack of experience of many bat ecologists in capturing it, unsuccessful surveys cannot on their own be interpreted as meaning this species is absent. In addition, advanced survey techniques such as trapping and radio tracking can be time-consuming and expensive; may require a project licence from Natural England; and also need to be deployed with care to avoid the excessive disturbance to local bat populations that could arise from trapping for multiple projects.
121. Trapping and radio tracking of Bechstein's bats associated with the Trowbridge woods have been undertaken and coordinated at a strategic level for a number of years. These surveys have yielded a wealth of information about important roost sites, foraging areas and commuting routes used by the local population. It is intended that these surveys will continue in future years and be supplemented by funding through this strategy in order to build on this baseline. Given the limitations of relying on individual site surveys, this strategic approach is likely to be more cost-effective to developing a baseline of Bechstein's presence and behaviour across the Trowbridge area.

122. The bat sensitivity zones described in Section 7 below have been developed based on existing survey information and current scientific knowledge about the species to denote those areas where habitat is of importance or is highly likely to be of importance for Bechstein's bat. It should be assumed that Bechstein's bat will be present in all red and yellow sensitivity zones and making use of all potential habitat features. Taking this into account, as well as the strategic surveys discussed above, it may not be necessary for specific surveys for Bechstein's bat to be undertaken in support of individual planning applications for development.
123. However, it is recommended that early consultation is undertaken with Wiltshire Council ecologists to confirm whether advanced survey techniques for Bechstein's bat are required to support a planning application. In situations where Wiltshire Council deem that Bechstein's surveys are nevertheless required, the survey methodology must be agreed with Wiltshire Council in advance (e.g. suitably competent staff, trapping dates, trap numbers, trap types and locations, sample size to be tagged, number of nights to track each tagged bat).
124. In these situations, the following minimum standards will apply:
- All surveys aimed at Bechstein's bats must be designed and undertaken by a suitably experienced and licensed bat ecologist with experience of Bechstein's survey and mitigation. This person will be registered on the Natural England Level 3/4 class licence; and must produce and sign off the final bat report to be submitted with the planning application.
 - Trapping surveys must be undertaken with a Sussex Autobat acoustic lure, as this model has been shown to attract Bechstein's bats through use of synthesised Bechstein's social calls (Hill, 2005). Use of other types of acoustic lure must be justified, including provision of evidence that the call sequence is effective in attracting Bechstein's bats.
 - Surveys for Bechstein's bats are likely to be required throughout the active season (April to October), although winter hibernation surveys may be necessary in some circumstances. It should be noted that swarming sites for Bechstein's can be missed if surveys are not undertaken in August to October. It is particularly difficult to assess the importance of these sites or dismiss the presence of Bechstein's therefore a precautionary approach is important.
 - All Bechstein's bats caught will be ringed and the data shared, to support the ongoing strategic population studies.

7 BAT SENSITIVITY ZONES

7.1 What do bat sensitivity zones mean?

125. The maps provided as Figure 4 and Figure 5 show mapped Bat Sensitivity Zones for Trowbridge and the surrounding area, including land to the north of Westbury on account of the evidence gathered in respect of visitor movements from Westbury to Clanger and Picket Wood.
126. These sensitivity zones are accessible in high definition via the Wiltshire Council website to allow accurate identification of the boundaries of each zone with respect to individual sites.
127. The zones identify where development of new greenfield sites would cause a high or medium risk of negative impact on the bat populations associated with the Bath and Bradford on Avon Bats SAC (Bechstein's bat, lesser and greater horseshoe bats). The Bat Sensitivity Zones are divided into 3 levels, which accommodate two factors: the likely importance of the habitat for the bat SAC populations; and the potential for impacts due to increased recreational pressure on key woodland sites.
128. For each different Bat Sensitivity Zone, Table 2 below sets out the type of impact that could occur due to development and a description of the implications for development proposals within each zone. A summary of the main factors associated with each Sensitivity Zone is provided below. The evidence that has been used to derive the boundaries of each Bat Sensitivity Zone has been set out in Section 5.

129. The Red Zone is located within 600m of woodlands or trees known to support maternity roosts for Bechstein's bat. New development of greenfield or residential brownfield sites within this zone is likely to result in high and unacceptable risks to bat populations, as a result of increased recreational pressure on key woodland sites and/or as a result of habitat loss. As such, development of new sites within this zone is highly unlikely to be permitted, and there should be no net increase in new residential curtilage or light levels within the zone.
130. The yellow medium risk zone represents the areas where habitat has been shown to be of importance, or is highly likely to be of importance, for Bechstein's, greater horseshoe and / or lesser horseshoe bat. Development of new greenfield sites is not precluded within these zones and sites have been identified within the WHSAP. However, such development is likely to require significant and appropriate habitat mitigation measures to be provided on site significantly reducing the developable area, and therefore the density of development as described in Section 8 below. Other considerations such as light levels, noise etc. will also need careful design to demonstrate that they will have limited impact.
131. Within the yellow medium risk zone, it will be critical to ensure that adequate bat surveys have been undertaken to inform development in accordance with Section 6 of this Strategy. It will be expected that habitat features of importance for greater horseshoe, lesser horseshoe and Bechstein's bat, including roosts, foraging areas and commuting routes, are retained and enhanced *in-situ* ensuring full functionality: specific guidance on how this should be achieved is set out in section 8 below.
132. Development within the yellow medium risk zone will be expected to firstly, fully mitigate on site for the loss of habitat to ensure no net loss using an established metric based on best practice and secondly, make a financial contribution to mitigate against the in-combination effects of development on greenfield sites, through strategic habitat creation and enhancement (see section 0 and Appendix 1).
133. The dark hatched medium recreational risk zone represents the areas where new residential development is expected to result in increased recreational pressure on key woodland bat sites. **New residential development proposals within this zone will be expected to contribute towards the delivery of mitigation to address strategic recreational pressure (see Appendix 2). Such mitigation will be paid for through Community Infrastructure Levy (CIL).**

Table 7.1 Bat Sensitivity Zones

Level of Impact/ Risk	Type of Impact/ Risk ²	Implications for development
<p>RED ZONE</p> <p>HIGH RISK</p> <p>(Figure 4)</p>	<p>Impacts will arise as a result of:</p> <ul style="list-style-type: none"> • Recreational pressure on woodlands used by breeding Bechstein’s bats • Loss of habitat of critical importance to supporting breeding Bechstein’s bats • Impacts will arise from developments considered alone and/or in-combination with other plans and projects 	<p>Habitat within the red zone is likely to be critical now and / or in the future to sustain this breeding population of Bechstein's bats. It is unlikely that development in this zone will be able to provide adequate mitigation to enable an assessment under the Habitats Regulations to conclude, beyond reasonable scientific doubt, no adverse effect on the integrity of the SAC.</p>
<p>YELLOW ZONE</p> <p>MEDIUM RISK</p> <p>(See Figure 4)</p>	<p>Impacts will arise on individual sites and in-combination with other development as a result of:</p> <p>Loss and/or degradation of habitat of importance to Bechstein’s, greater horseshoe and lesser horseshoe bats for foraging, commuting and roosting including:</p> <ul style="list-style-type: none"> • Buildings • Grassland • Hedgerows • Trees • Scrub • Water bodies • Riparian corridors • Availability/access to roosts 	<p>Development on greenfield sites outside the settlement boundaries² will be able to demonstrate no adverse effect on site integrity of the SAC provided that:</p> <ul style="list-style-type: none"> • 100% mitigation is provided for all greenfield habitat loss within the allocation site boundary as demonstrated by use of The Biodiversity Metric 2.0 or any subsequent revisions thereof. • Retained core bat habitat remains connected to the wider habitat network and is adequately buffered in accordance with this strategy • Core bat habitat remains relatively undisturbed by the effects of urbanisation in accordance with this strategy • A financial contribution is made towards funding the LPA scheme in Appendix 1 for mitigating residual in-combination effects from loss / degradation of bat habitat.
<p>GREY HATCHED ZONE</p> <p>MEDIUM RISK</p> <p>(See Figure 5)</p>	<p>Impacts will arise in-combination with other development as a result of:</p> <ul style="list-style-type: none"> • Recreational pressure on woodlands used by Bechstein’s bats 	<p>Residential development will be able to demonstrate no adverse effect on site integrity of the SAC provided that:</p> <ul style="list-style-type: none"> • Funding being collected via CIL towards the LPA scheme in Appendix 2 for mitigating residual in-combination effects from recreational pressure.

² Note that impacts arising from the Strategic Allocation for Ashton Park have already been addressed through a bespoke mitigation strategy and no further mitigation is required for this allocation.

Table 7.2 Criteria applied to derive bat sensitivity zones

Level of Impact/Risk	Criteria
<p>RED ZONE</p> <p>HIGH RISK</p> <p>(See Figure 4)</p>	<p>This includes land within 600m of identified woodlands containing 'Core Roosts'.</p> <p>The Footprint Ecology Report (Footprint Ecology, November 2018) showed that the woodland bat sites draw visitors on foot from a radius of around 600m; beyond this, visit rates reduce to a low and constant rate. Any new residential development within the 600m radius is likely to increase foot visitors to the woodlands and therefore increase recreational pressure within the woodland. Recreational pressure is already being shown to have negative impacts to the woodland site, including the bat populations, so any additional incremental residential pressure would have an adverse impact on the integrity of the Bath and Bradford on Avon Bat SAC. Records within the GIS database and contained in reports submitted to comply with the S106 agreement for Castlemead, show that habitat within the red zones comprises critical habitat within the core foraging and feeding ground ranges associated with Bechstein's maternity roosts providing key resources now and / or in the future, in part compensating for limitations in the core woodland habitat.</p>
<p>YELLOW ZONE</p> <p>MEDIUM RISK</p> <p>(See Figure 4)</p>	<p>This zone is a composite of:</p> <ul style="list-style-type: none"> • A 1.5km buffer around 'Core Roosts³' for the Bechstein's breeding population in the Trowbridge area, including Green Lane Wood, Biss Wood and Picket and Clanger Wood. These buffers are referred to as 'Core Areas' in the Wiltshire Bat SAC Guidance page 7, section 3.2 (Wiltshire Council, September, 2015) 'Core Areas' are of particular importance for foraging and commuting bats associated with the 'Core Roosts'. • A 4km buffer around 'Core Roosts' for greater horseshoe bats and a 2km buffer around 'Core Roosts' for lesser horseshoe bats where these overlap with the Trowbridge Community Area. • Key commuting corridors which link the above-mentioned Core Areas with the SAC which lies beyond the Trowbridge Community Area. These include: the River Biss and railway line through Trowbridge; the area known as the Hilperton Gap in north Trowbridge; land to the south west of Trowbridge and; land to the north east of Trowbridge. Evidence comes from radio tracking and verified records of Annex 2 species found in this locality. <p>This zone is relevant to development at new greenfield sites and as such excludes existing urban areas as defined by settlement boundaries.</p> <p>Note that the Wiltshire Bat SAC Guidance is subject to review and this zone will need to be reconsidered if 'Core Areas' are amended in the light of new scientific information.</p>
<p>GREY HATCHED ZONE</p> <p>MEDIUM RISK</p> <p>(See Figure 5)</p>	<p>The Footprint Ecology Report has identified the zone of influence within which new residential development is likely to result in increased recreational use of the woodland bat sites. As a minimum, the Footprint Ecology Report states that (para 6.46) the outer limit of the zone of influence should comprise the settlements of Trowbridge and Westbury. For areas outside the settlement boundary, the zone from which 75% of visitors originate has been mapped in accordance with recommendations in the Footprint Ecology Report (which comprises 3.356km for Clanger and Picket Wood and 2.656km for Green Lane Wood).</p>

³ The Wiltshire Council Bat SAC Guidance includes the following criteria for 'Core Roosts' relevant to this document: breeding or wintering roosts containing 50+ adult greater horseshoe bats; breeding roosts containing 100+ or wintering roosts containing 50+ adult lesser horseshoe bats; any traditional breeding roosts for Bechstein's bats.

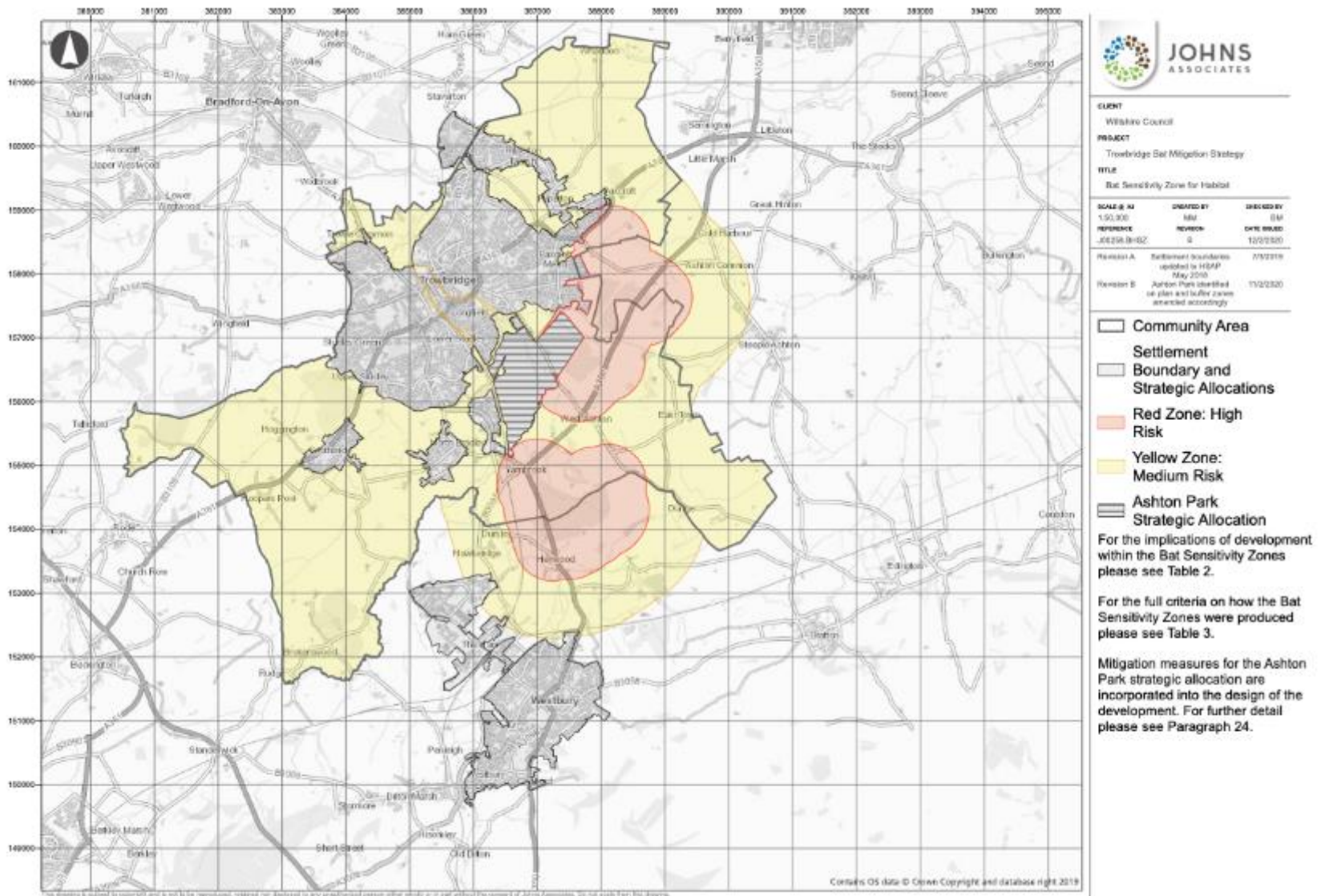
7.2 How bat sensitivity zones have been derived

134. The baseline sources from which the Bat Sensitivity Zones have been derived are listed in Section 3.2.7 of this document. The various bat data have been compiled on a GIS database. Table 3 sets out the criteria that have then been applied to determine the boundaries of each zone in accordance with the GIS database.

7.3 Review of bat sensitivity zones

135. The Bat Sensitivity maps that have been created during this process must be considered dynamic documents as the relative importance of landscape features will alter as the area is subject to further development and habitat change. The intention is that this document and the corresponding mapping outputs will be periodically reviewed to ensure that it remains relevant to the present landscape.
136. The importance of landscape features and habitats for bats, particularly relating to those species associated with the Bath and Bradford on Avon SAC, has been assessed for the purposes of this document based on the current scientific research and understanding of the ecology of these species. As further research is published that alters our understanding, this assessment should be revised to accommodate any new information. For example, the 'Core Areas' sourced from the Wiltshire Council Bat SAC guidance (Wiltshire Council, September, 2015) are based on generic research for the SAC species. The actual location of key foraging elements may in some cases be beyond the currently mapped 'Core Area' range; and asymmetry in habitat dispersal may strongly influence bat activity. It is therefore essential to maintain a feedback loop in the process to allow additional areas to be added to the 'Core Areas' where necessary.
137. It should be noted that the Wiltshire Council Bat SAC Guidance is regularly reviewed and updated to take account of latest scientific information or changes to legislation. Any changes to this overarching guidance may therefore result in further changes to the Bat Sensitivity Zones for Trowbridge and the surrounding areas. For example, evidence is emerging that the local population of Bechstein's bat requires a larger summer range than other studied populations and Core Areas may therefore need to be extended around other woodlands that have been shown to support breeding sub-colonies (e.g. Woodside Wood).

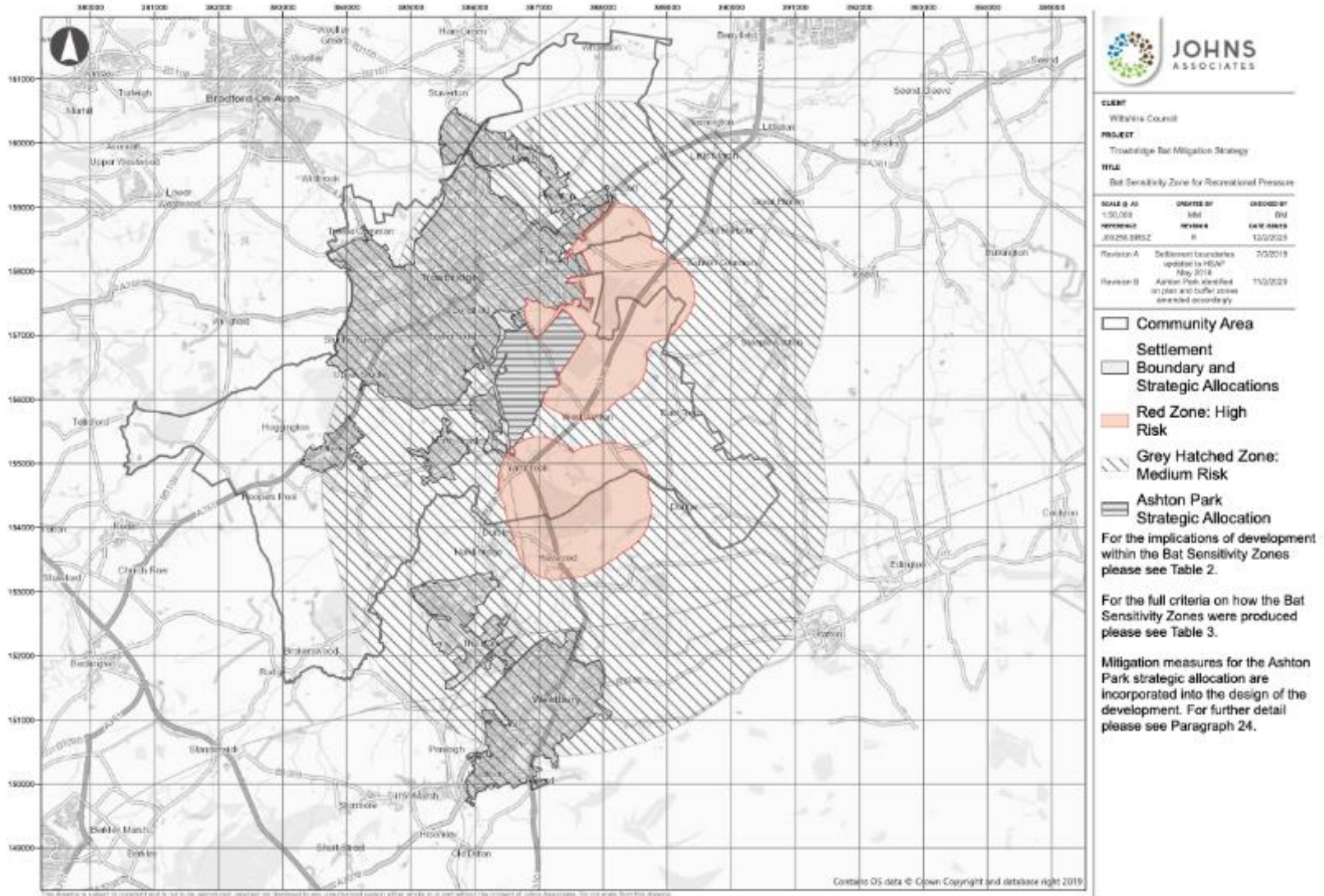
Figure 4 Trowbridge Bat Mitigation Strategy – Bat Sensitivity Zones for Habitat



Page 655

N.B. This document has been created to address development in the Trowbridge area and in particular the Housing Sites Allocations Plan, the extents to which this strategy applies are therefore restricted to a combination of the Community Area and suitable buffer areas surrounding the strategic woodlands. Any development proposals outside of these zones, and therefore the scope of this document, will still be subject to detailed assessment in relation to the potential impacts on bats and will require separate mitigation measures independent of those described within this document. These mitigation requirements are beyond the scope of this document.

Figure 5 Trowbridge bat Mitigation Strategy – Bat Sensitivity Zones for Recreational Pressure



Page 656

N.B. This document has been created to address development in the Trowbridge area and in particular the Housing Sites Allocations Plan, the extents to which this strategy applies are therefore restricted to a combination of the Community Area and suitable buffer areas surrounding the strategic woodlands. Any development proposals outside of these zones, and therefore the scope of this document, will still be subject to detailed assessment in relation to the potential impacts on bats and will require separate mitigation measures independent of those described within this document. These mitigation requirements are beyond the scope of this document.

8 ON SITE MITIGATION REQUIREMENTS

138. **This section sets out generic standards for all developments located within the Yellow Bat Sensitivity Zones** (and also the Red Zones on the rare occasion that it is deemed acceptable in principle, for example for householder applications where bat habitat is not affected). This section has been based on the guidance contained within the Wiltshire Council Bat SAC Guidance (Wiltshire Council, September, 2015), but includes additional specific requirements for the Trowbridge area.

8.1 Recommended Approach and Information Required for Planning Applications

139. The requirements for ecological mitigation must be used to guide development design from the outset. The necessary mitigation measures for bats will work when integrated as a fundamental component of the scheme design; but conversely, are unlikely to be successful when tacked on to a scheme retrospectively. Developers are encouraged to seek pre-application advice through a formal pre-application request in order to understand how the Council Ecologists are approaching this matter and to reduce the risk of applications being unsuccessful.
140. Mitigation proposals must be developed in close consultation with other professionals such as highways / lighting engineers, landscape architects and urban designers to ensure that they are realistic, achievable and deliverable, and can be maintained in the long-term without creating conflicts with the needs or aspirations of highways uses and local residents.
141. Ecological mitigation design must be based on good standards of bat survey (in accordance with Section 6) and must address all habitat features of value for Bechstein's, greater horseshoe and lesser horseshoe bat (including roosts, foraging areas and commuting routes). The design must focus on retaining, protecting and buffering these habitat features so their key functionality can be retained in accordance with guidance set out in Section 8 of this document.
142. Development of site allocations and large neighbourhood plan sites are expected to be subject to a prior rigorous whole site masterplanning process, either via a Development Brief, or via an outline planning application that covers the entire allocation. The masterplanning process must incorporate core bat habitat features as a fundamental component of the site design. A Parameters Plan (PP) must be prepared identifying areas of the site where specific sensitive design measures or restrictions will be required and areas which are to remain undeveloped or form part of the landscaping. The Site Masterplan will demonstrate how the development proposals could be delivered in light of those constraints. In particular it will demonstrate that sufficient land can be set aside for habitat to mitigate for 100% of the land lost to the development footprint. Outline planning permission, if granted, will be subject to compliance with the PP.
143. For full and reserved matters planning applications, an Ecological Mitigation Plan (EMP) must be submitted as a formal planning application drawing. This may incorporate other landscape details as appropriate. The EMP must be a scaled plan that clearly shows the following information:
- Location and dimensions of replacement roosts plus separate architectural drawings to show detailed design and materials for bat houses. Plans must demonstrate how replacement roosts are tied into the surrounding landscape in terms of providing suitable vegetation to shelter emerging bats and in terms of connectivity to commuting routes and foraging areas.
 - The EMP should be based on topographical survey and must show the accurate location, extent and area of connective / foraging habitat to be retained, created or enhanced.
 - Any proposed tree or shrub planting and areas of wildflower grassland to be seeded must be scaled and accurate with the extent and areas shown and with full landscape specifications. Further details are provided in Sections 8.2 and 8.3.
 - The EMP must identify required temporary working areas as well as the boundary of the permanent built development. Accurate development boundaries should be overlaid on the EMP to allow accurate scaling and location of mitigation measures.

- Detailed and scaled cross-sections linked to the EMP should be provided. These should show all structures and vegetation to be provided together with minimum widths and distances for each component (see also Section 8.2 below).
 - The timing of the delivery of measures included within the EMP is crucial to the assessment of the suitability of these measures, risks of delivery and the impact of any lag between habitat removal and the establishment of replacement habitats/features. As such, a detailed schedule of works should be submitted describing the delivery timescales for all measures included within the EMP.
 - A review process to ensure that failed measures are highlighted and can be remedied.
144. For development proposals affecting core bat habitat, the following additional information is likely to be required to support planning applications:
- Pre and post development lux contours (see Section 6.2) plus details of lighting design (see Section 8.3);
 - A Construction Method Statement which sets out how impacts to bat habitat features, including core bat habitat will be managed during the construction phase. Consideration must be given to timescales for the new planting to become effective. New connective habitat should be in place at the earliest possible stage and conditions may be used to secure planting pre-commencement or before completion; and
 - A Landscape and Ecology Management Plan (LEMP) that includes a Habitat Management Plan (HMP) to ensure the successful long-term habitat management of bat habitat, including core bat habitat. This must identify who will be responsible for undertaking the management as well as mechanisms of funding together with aims and objectives of management. Initial management prescriptions and timescales should be specified together with a review mechanism for updating the HMP as required;
145. Commuting routes and foraging areas should be retained within the public realm where they can be effectively protected and appropriately managed for bats in accordance with the approved LEMP in perpetuity under the terms of an enforceable planning condition or legal agreement.
146. Implementation of the overarching mitigation strategy and submitted supporting information, including the PP and/or the EMP and/or the LEMP, will be secured either through a condition or legal agreement of any permission granted. If insufficient mitigation measures are provided to demonstrate that the bat populations would be adequately protected, the local authority will have no legal alternative but to refuse the application.
147. Further details of the information that will be expected on lighting, habitat creation and enhancement associated with connective and/ or foraging habitat and associated buffer zones have been provided in Sections 8.2 and 8.3 below.

8.2 Standards for Habitat Mitigation Within the Site

148. This section sets out the standards for mitigation and creation of habitat for Bechstein's, greater horseshoe and lesser horseshoe bat, together with the minimum information that must be submitted to demonstrate that proposals will be effective.

8.2.1 General principles

149. It is expected that all direct and indirect impacts on bat habitat lying within the allocations will be mitigated within the respective allocated site. It is expected that core bat habitat will be retained and reinforced and enhanced as dark zones to retain connectivity for bats in the landscape. **The most important general principle is that wide swathes of land are required to be set aside as core bat habitat in order to retain a permeable and functioning landscape for the target species.** Development areas for each allocated site have been estimated as set out in Table 4 below. For each allocated site, it is anticipated that in most circumstances the full residual green space will be required for mitigation. Dark buffer zones may be used for hard and soft landscaping provided that this use does not compromise the functioning and maintenance of the core bat habitat it protects.

150. The diagram in Figure 6 below provides an illustration of retention and enhancement of core bat habitat (Zone A) in relation to the development area.

Table 8.1 Trowbridge housing sites estimated area of land to be developed and land available for mitigation

Trowbridge	Community Reference/Site Name	Original Number of dwellings and size	Revised Number of dwellings and size	Estimated Development Area (based on 30 dph ie total no. of dwellings /30)	Estimated residual green space/on-site mitigation
H2.1	Elm Grove Farm, Trowbridge	200 Approx.14.33ha of land	250 Dwellings Approx.17.78ha of land	8.33ha	9.45ha
H2.2	Land off the A363 at White Horse Business	150 Was 25.62ha	175 Dwellings Approx. 18.96ha land	5.83ha	13.13ha
H2.3	Elizabeth Way, Trowbridge	205 Was 16.33 ha	355 Dwellings Approximately 21.24 ha of land	11.83ha	9.41ha
H2.4	Church Lane, Trowbridge	45 Was approx. 3.72ha	45 Dwellings 5.93 ha of land	1.5ha	4.43ha
H2.5	Upper Studley, Trowbridge	20 Was 2.33ha of land	45 Dwellings 2.27ha of land	1.5ha	0.77ha
H2.6	Southwick Court, Trowbridge	180	18.17ha 180 dwellings	6ha	12.17ha
Total			1,050 Dwellings Approx. 84.35ha	34.99ha ¹	49.36ha

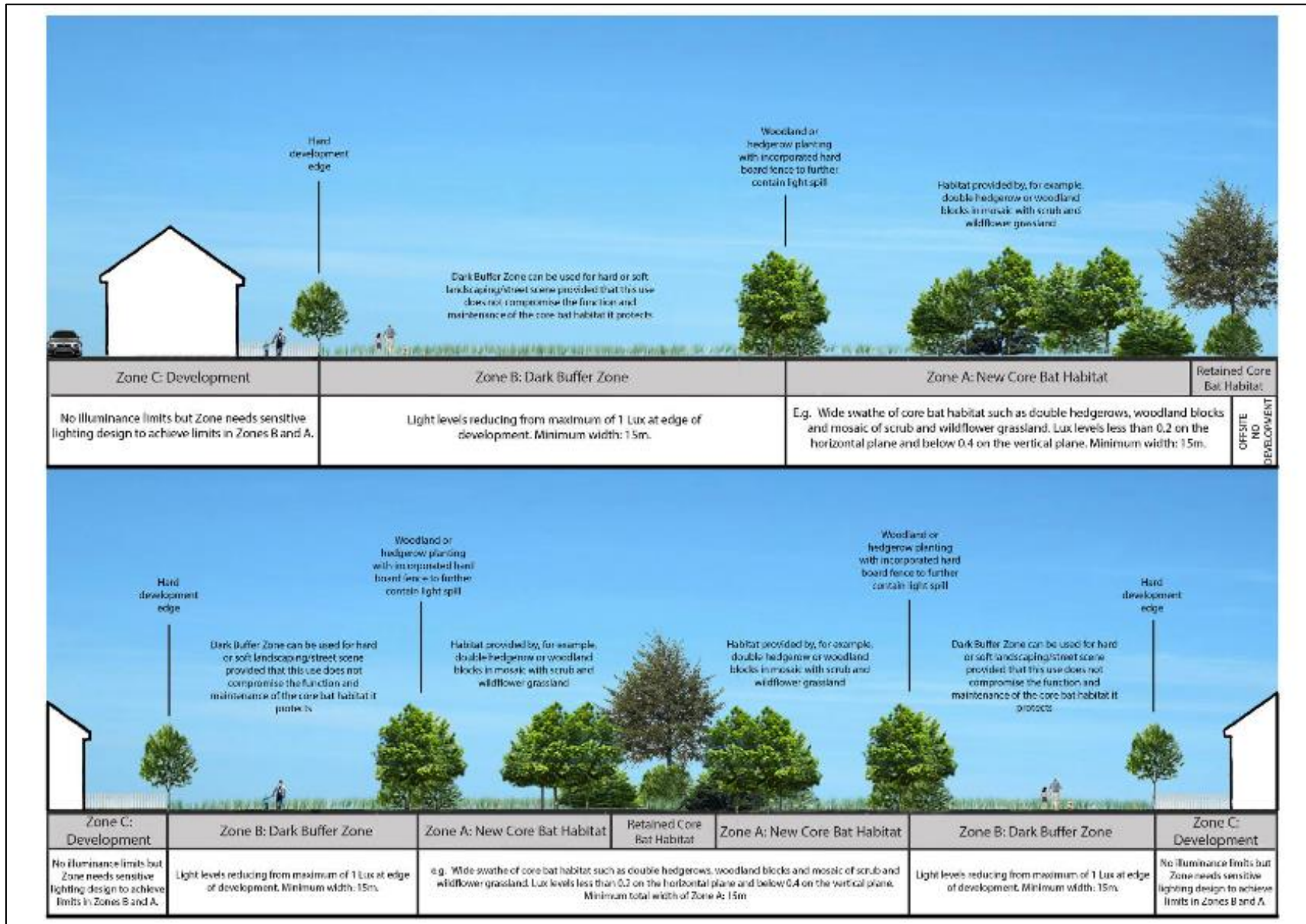
¹ Development Area is considered to be all the land in Zones B and C as shown on the illustrative section given in Figure 6.

NOTE: The allocations in the HSAP include allowances for on-site mitigation to address identified constraints including: flood risk, ecology, landscape, historic environment. Based on a conservative estimate that the sites will be built out at 30 dwellings per hectare, the estimated site development area can be expressed as above.

151. In addition, to retention and enhancement of core bat habitat, **adequate buffer zones must be provided for retained, enhanced or newly created core bat habitat** (see Figure 6 below). It is likely to be necessary to buffer bat habitat features considerably from development in order to secure suitable habitat conditions and suitable light levels, taking into account the potential for private owners to fit their own external/security lighting in the future. A minimum standoff distance of 15m from the development to the outside edge of any part of the bat core habitat is required to be provided as a buffer zone. The minimum dark buffer zone (Zone B) that must be provided from core bat habitat features is shown in Figure 6 below, together with associated lux level requirements. Further descriptions of acceptable land uses within the buffer zone is also provided in Section 8.2.
152. The following general principles also apply for habitat creation and retention (see also Sections 8.2 and 8.3 below):
- **Substrate:** using the correct planting substrate is critical to the eventual success of new habitat creation. For example, wildflower-rich grassland should be created on soils with low nutrient content, whereas good sub and topsoil depth and structure is required for tree and shrub planting. It is expected that full details of planting substrate must be provided with planning applications, including the results of soil testing in some instances.
 - **Species** to be planted or sown must be native and locally appropriate to the Trowbridge area.
 - **Programme:** a timeframe for habitat creation and enhancement together with timing of expected management measures must be provided. It is expected that all habitat creation and enhancement measures will be implemented at the optimum time of year unless otherwise justified e.g. tree planting during the winter; and sowing seed in the spring or autumn.
 - **Detailed methodology** must be specified that sets out how habitats will be created or enhanced.
 - **Management methods** must be specified for immediate aftercare of created/ enhanced habitats. For example, maintenance of tree planting, with replacement of all failures after three years.
 - **Methods** for long-term management of created/ enhanced habitats must be specified.

Figure 6 Core bat habitat feature and associated buffer zones indicated for both development boundary features (above) and within development features (below)

Page 662



8.2.2 Hedgerows

153. Hedgerows act as commuting structures, foraging habitat and provide feeding perches for horseshoe bats and probably for Bechstein's bat. Priority should be given to enhancing existing hedges, particularly ancient hedges, through planting up gaps and implementing improved management regimes for the long-term. Methods for restoration of hedgerows such as coppicing or laying must be specified in detail. The breaching of some hedgerows will be unavoidable but mitigation will need to ensure that across the site as a whole, habitat continuity is maintained. Mitigation for individual hedgerows should be proportionate to their importance for bats. Residual in-combination impacts will be mitigated offsite through S106 contributions to the Council's bat habitat mitigation scheme.
154. New hedge lines may provide effective mitigation if they divide large fields into smaller units and/or provide links to other bat habitat such as blocks of woodland. Hedgerows must be considered as being located entirely in Zone A and the strict illuminance limits specified in Section 8.3 must apply. Hedgerows used for bat mitigation must be capable of being managed to meet the following criteria:
- be at least 3 to 6 metres wide
 - at least 3 metres high
 - contain standard trees planted frequently along their length.
 - Cutting /trimming every 2-3 years
 - Sufficient space adjacent to the hedgerow to allow for 2-3 years growth and access for maintenance. This area to be managed as species-rich grassland.
 - No spraying or mowing at hedge base

8.2.3 Woodlands

155. Woodlands provide core foraging habitat for all three target species of bat. It is expected that all existing areas of woodland will be retained as part of development proposals. Mitigation may take the form of enhancement of woodland habitat in line with the principles outlined in this section.
156. Even recently-planted copses have been shown to provide value in the Trowbridge landscape for foraging Bechstein's bat and therefore inclusion of new woodland planting as part of development proposals should be considered as mitigation, either to extend existing woodland habitat or as new copses.
157. In general, woodland blocks should be as large as possible; and should be directly connected to suitable bat habitats in the surrounding landscape. They should support a diverse and species-rich mix of native tree and shrub species in the canopy and understory layers.
158. Trees and shrubs for new woodland should be planted in naturalistic non-linear patterns. Specifications for new woodlands must include adequate detail, including a planting schedule that specifies species, stock, ground preparation, planting density, timing, planting methodology, weed control, plant protection and long-term maintenance. Aftercare management, until such point that the woodland is established, will be particularly important.
159. When designing woodlands, the target species needs to be considered. For example, Bechstein's bat prefers woodland with a closed canopy and a dense understorey. Lesser horseshoe bats prefer to forage in the woodland interior where micromoth abundance is greatest: and therefore, require proportionally less woodland edge exposed to the surrounding matrix, but with constant canopy cover and a diverse understorey. Whereas greater horseshoe bats show a preference for large grassy rides and glades where macromoth abundance will be greatest.
160. Woodland edge should be managed with diverse structure. Scalloped edges and bays will provide sheltered areas with higher insect concentrations. Management should aim for a structured transitional edge with a variety of types of vegetation from trees to shrubs and rough grass.

161. Whilst formal access and anthropogenic disturbance (e.g. lighting, noise) is unacceptable within on-site mitigation woodlands, a degree of well managed informal access may be permitted, subject to an assessment as to the degree to which this recreational use would compromise the provision of high quality foraging habitat for bats.

8.2.4 Aquatic habitat

162. Aquatic habitat is used for foraging to a greater or lesser extent by all target species of bat. Bechstein's bat has been shown to prefer woodland in close proximity to water; whilst caddis flies (with an aquatic larval stage) are an important secondary food source for greater horseshoe. Prey favoured by lesser horseshoe includes mosquito, gnat and caddis fly, all of which have an aquatic life stage; and note that gnats and midges also use damp places near water to breed.
163. Therefore, incorporation of new ponds and waterbodies into habitat creation schemes should be considered, providing that these features are linked to other favoured habitat types, particularly woodland and hedgerows. Ponds or water bodies with permanent water should be created in dark areas. It is possible that these could form SuDS attenuation features as part of the surface water drainage design for a development.
164. The aim should be to achieve a varied and diverse habitat on the banks of ponds, including varied bank profiles with small bays and headlands, and a diverse structure to marginal vegetation (trees, shrubs and tall herbs and grasses). Ponds should be created with varying depths and undulating topography to the bed.
165. Where bank management is necessary, restrict it to a small area and work on one bank at a time. Carry out management sensitively, aiming to enhance variation and structure in vegetation.

8.2.5 Grasslands

166. Although good for bats, grazed pasture is unlikely to be a practical option for most development schemes. The creation of species rich grassland is likely to be more feasible for mitigation, particularly where impacts to horseshoe bats are predicted. This will need to be managed to produce a long sward to support an abundance of Noctuid moths, one of the main prey items hunted by greater horseshoe bats, as well as micromoths hunted by lesser horseshoe. Specified seed mixes should include food plants, as well as grasses, such as dandelion, dock, hawkweeds, plantains, ragwort, chickweed, fat hen, mouse-ear and red valerian and other herbaceous plants. Wildflower grassland creation must be specified in detail (including seed mix, ground preparation, sowing methodology and aftercare).
167. Management of grassland areas should aim to encourage development of a grassland-scrub mosaic to provide structured and sheltered habitat and to encourage a diverse range of prey species. Management should comprise rotational cutting with cuttings removed. Cutting should be undertaken in late autumn.

8.3 Lighting

168. Some of the technical information in this section has been reproduced with the kind permission of Bath and North East Somerset Council from their Waterways Design Guidance Protecting Bats in Waterside Development (Bath and North East Somerset Council, 2018).
169. In addition to the guidance set out in this section, it is expected that the approach to lighting for new development is undertaken in accordance with the guidance in (Bat Conservation Trust and Institution of Lighting Professionals, 2018).
170. It is essential that the bats and lighting issue is acknowledged and integrated into the design process from the outset, and in an iterative way. It should not be left to later design stages or be retrofitted into development proposals.
171. As an overarching principle, dark corridors must be maintained around roosts, foraging areas and commuting corridors with no net increase in light levels as a result of the development in areas used by bats. It should be noted that enhancements over the existing baseline must also be built into scheme design wherever possible i.e. development schemes that actively reduce any existing elevated lux levels associated with bat habitat features.

172. Each development scheme is likely to require bespoke lighting mitigation, designed by a lighting engineer, working in collaboration with a specialist bat ecologist.

8.3.1 Illuminance Zones

173. Development sites should include a discrete buffer zone oriented parallel to each retained bat habitat feature. The zones shown on Figure 6 and described below must be used to determine the boundaries for the control of light spill to be imposed at the outset of scheme design.
174. It is critical that the bat habitat zone (Zone A) is maintained in 'completely dark' conditions, defined as < 0.2 lux on the horizontal plane and less than 0.4 lux on the vertical plane (measured at 1.5m and 4m) (Bat Conservation Trust and Institution of Lighting Professionals, 2018). There must be no glare impact from the development within this zone. Where baseline levels are above the lux levels stated here, the development design should ensure there is no increase above existing background light levels and ideally, where possible, reduce these towards completely dark conditions.
175. The buffer zone (Zone B) is the area where the urban environment gives way to softer landscaping and natural features. It is expected that habitat sympathetic to the bat habitat zone will be created in the buffer zone. However, the buffer zone can also be multi-functional in that it can be used as public open space, access for pedestrians and cyclists, soft landscaping with native species, or fencing. It is critical that the buffer zone is unlit, with strict illuminance targets to be met (within the range of <1 lux on the horizontal plane measured at the development edge of the buffer zone reducing to <0.2 lux on the horizontal plane at the boundary with the bat habitat zone).
176. The development zone (Zone C) is characterised by a dominance of hardstanding and built structures. While lighting is required in this zone, sensitive lighting design will be required in order to achieve illuminance targets within the buffer zone and the bat habitat zone and to avoid upward spread of light and thereby minimise environmental impacts more generally.

8.3.2 Prediction of post-development lighting conditions

177. A detailed Lighting Impact Assessment (LIA), including modelled lux contour plots or similar plans displaying projected illuminance levels, is required and should be prepared by a suitably competent lighting professional. The LIA should show the number, location and specification of each luminaire within the development, including its orientation, dimming, shielding, height, recessing, tilt and its output. All luminaires apart from those solely used in emergency situations must be included within the modelling and be set to their intended normal output levels during active use. Motion-sensitive or security lighting e.g. for individual dwellings is not considered emergency lighting and should be included.
178. All areas of the development site must be modelled using a horizontal ground level calculation plane, with modelled contours shown on a horizontal illuminance contour plan. Additionally, separate calculation grids should be included where potential bat habitat features would be affected by increased light levels to show vertical plane illuminance at 1.5m and at 4m (with vertical illuminance contour plans provided). These directions and heights correspond to likely horseshoe and Bechstein's bat behaviour and enable light spill from all directions to be accounted for.
179. The potential for glare, source intensity in candelas, should be considered and a discussion of its potential to be felt (by humans) at locations beyond the site boundary should be given.
180. Software used should be an industry-recognised package operated by a lighting professional.
181. Illuminance calculations will need to combine the outputs of exterior and interior light sources, thereby including the component of light transmitted via windows and other openings. Interior lighting to be modelled in all areas where there is potential for light to emanate through glazing, towards any sensitive bat habitat features. It is essential that the worst-case scenario is modelled i.e. all interior lighting switched on, and assuming no curtains or blinds in operation. Any light transmission factor applied to the glazing (tinting) should be clearly stated.

182. A maintenance factor of 1 should be applied to all lighting calculations and all lumen outputs must be based on a luminaire's Initial Lumens (IL) in order to show its 100% intended 'Day 1' output.
183. While soft landscaping planting is highly encouraged and can make a significant impact on attenuating glare and illumination, it cannot be factored in to the illumination models for several reasons. Newly planted vegetation may take several years to become established and may be removed in later years causing problems in enforcing planning conditions. The screening effects of immediate and more permanent barriers such as fences, walls and banks should be factored in by using topographical data within modelling.

8.3.3 Lighting design solutions

184. The following measures should be considered for incorporation within lighting schemes to reduce and minimise the impact from development. Lighting design must be undertaken by a suitably competent lighting professional.

8.3.3.1 *Mitigating light spill from exterior lighting provision*

185. Consider whether exterior lighting is absolutely required and avoid lighting where unnecessary. The likely uses of the external spaces/routes of a development must be fully understood to determine whether they should be lit after dark, and if so how, to what level and during which hours of use after dark. All of these should be articulated as part of a proposal.
186. Consider using barriers to light: light intensity can be reduced in some locations by creating a light barrier to restrict the amount of light spill reaching sensitive areas. Barriers can be in the form of walls, bunds or fences. Vegetation can be used to enhance these features, but shouldn't be relied upon in achieving desired light levels.
187. Where lighting is unavoidable, seek to reduce light intensity and numbers of luminaires, and ensure the use of the most directional and focused luminaires available. Careful specification of optics and light shielding/shaping accessories fitted to luminaires as specified by a lighting professional can further reduce light spill. Aim to ensure that the Upward Light Ratio (ULR) of the installation is limited to 0% in order to stop poorly aimed luminaires and reduce glare. Mounting heights should be minimised to reduce the distance light can spill.
188. Light sources with low blue and low UV content to be employed. In preference modern LEDs should be selected as these emit significantly less or no UV light so are less disruptive to both insects and bats. Warm colour temperature LED light sources to be employed preferably at 3000Kelvin (as these have been shown to cause less impact on bats) (Stone E. L., 2015; Stone E. L., 2009; Stone E. L.).
189. Installation by developers of specified security lighting will minimise the likelihood of new occupants installing their own devices. Such essential specified security lighting should exclusively use PIR motion-sensitive luminaires located and designed to avoid light spill into bat habitat and buffer zones. Security lighting must be specified to minimise above horizontal outputs and should comprise LED warm light sources (at 3000Kelvin).
190. Consider the use of Control Management Systems (CMS) to apply dimming regimes during the night to reduce levels of illuminance during periods of high bat activity (typically soon after dusk and the hours pre-dawn) or to ensure lighting only comes on when it is needed –e.g. when activated by the movement of pedestrians. Pre-programmed dimming must be included on all highway lighting with the dim level appropriate to the location and highway safety requirement. Even colour shifting can be considered. This should not be at the expense of public safety and could include the use of presence detectors to enable light levels to intensify or light colours to shift when required. E.g. Low levels of amber-red light could be employed along protected corridors, with warm white light with increased colour rendering activated to support pedestrian safety and security.

8.3.3.2 *Mitigating light spill from interior lighting provision*

191. Building set back and orientation can dramatically reduce the reach of light spill and the encroachment on sensitive bat habitat features so should be carefully considered with the input of a lighting professional.
192. The careful planning of internal building layout and proposed use may be an option for achieving the above standards near bat habitats where: there are space restrictions on small developments; existing buildings are being retrofitted; or in very limited circumstances for larger developments. The following factors should be taken into consideration. However, as many of these factors are difficult to enforce for the lifetime of the development, their suitability will be assessed against the particular significance of the bat feature concerned.
- The design and depth of window reveals and reduced transparency of glazing to substantially reduce light transmission.
 - The use of balconies and louvered windows to reduce light transmission onto sensitive bat habitat features.
 - Tight optical control must be applied to any luminaire within 1.5m of glazing. This includes the use of, for example, 'darklight' type downlights with deep recessed light sources and focused beams. Diffuse fluorescent type luminaires should be avoided alongside glazing.
 - Light fittings can be set back away from windows and also recessed into ceilings rather than using pendant luminaires to further control light transmission.
 - Light spill from ground floor spaces should not extend beyond 1.5m of the glazing line.
 - In the case of office lighting, lighting to areas behind glazing should be controlled on a separate lighting circuit to enable them to be switched off or dimmed separately when a different area of the office floor is in use.
 - All internal lighting must be switched off when the room is unoccupied – this is only relevant to commercial buildings and should be achieved through the use of lighting control systems and/or appropriate building management.
 - The use of automated dimming circuits and automated blinds on windows to attenuate light spill is unacceptable due to concerns regarding their long-term maintenance.

8.3.4 Monitoring of lighting

193. In order to ensure the accuracy of modelled lighting and conformity with predicted lux contours, a post-development lighting survey should be carried out by a lighting professional using a calibrated cosine corrected light meter within three months following completion. This will be required by planning condition provided that options for remediation are likely to be available. Otherwise the planning authority will place the onus on the developer demonstrating that a precautionary approach has been followed. A further compliance survey may also be required 2 years post-completion to check that no alterations have been made within the development.
194. The survey should be carried out with all lighting active (to replicate the lighting state within the modelling) and notes should be taken as to the output and activity of luminaires observed during the survey. Surveys should be timed to take place on evenings of little moonlight, either due to cloud cover or a new moon. Readings of illuminance should be taken at representative locations according to the planes and orientations used in the modelled calculations as chosen by the lighting professional. Results and discussion must be submitted to Wiltshire Council for approval.
195. Where lighting levels are greater than predicted, remedial measures must be put in place to reduce illuminance as per the lighting condition.

8.3.5 Summary of Submission Requirements for Planning

196. Under the Habitats Regulations 2017 (as amended) the planning authority is required to undertake an appropriate assessment before issuing planning authorisations. Developers will therefore need to satisfy TBMS requirements at each stage of the planning process. In the time between granting outline permission and submission of reserved matters it is possible these requirements may change e.g. as a result of new survey or other evidence becoming available. All applications will be judged against the most up to date evidence available.

Table 8.2 Guidance on expected information required for different planning application types

Submission requirement	Planning Application Type			
	Outline	Full	Reserved Matters	Householder
Seek pre-application advice	Helpful to establish whether the TBMS constrains the principle of development	Helpful to establish the extent to which the TBMS will drive layout and design of the development	Helpful to establish whether changes have occurred in relation to the TBMS since planning permission was granted	Necessary if application lies in the Red Zone
Bat surveys	Yes	Yes	Yes if more than 2 years since Outline / Full application approved	Potentially yes depending on nature of the proposals
Masterplan	Yes, to cover the entire allocation. Indicative test layouts required to demonstrate housing numbers are compatible with constraints	Only if permission is being sought for part of a larger allocation / development site	No	No
Parameters Plan incorporating TBMS standards for habitat mitigation (section 8.2)	Yes	No	No	No
Ecological Mitigation Plan	No	Yes	Yes	Potentially yes depending on nature of the proposals
Baseline lighting surveys	Not usually, may be necessary where housing density suggests minimum standards may not be met	Yes	Yes if not provided in Outline application	Yes if standards in section 8.2 cannot be met
Lighting Impact Assessment, including lux contour plots, in line with section 8.3 of TBMS	Not usually, may be necessary where housing density suggests minimum standards may not be met	Yes	Yes if not provided in Outline application	Yes if core bat habitat affected
Construction Ecology Management Plan	No	Yes, may be deferred to condition if requirements are straightforward	Yes, may be deferred to condition if requirements are straightforward	Not usually
Landscape and Ecology Management Plan	No	Yes, may be deferred to condition if requirements are straightforward	Yes, may be deferred to condition if requirements are straightforward	Not usually

9 OFF-SITE AND STRATEGIC MITIGATION

9.1 Habitat Mitigation Measures – The Batscape

197. One of the main aims of the strategic mitigation set out within this document is to ensure the capacity and permeability of the landscape to support foraging and commuting Bechstein's, greater horseshoe and lesser horseshoe is maintained (through a network of habitat enhancement, restoration and creation). This will support the viability of the bat populations; and ensure that they are sufficiently robust to respond dynamically to landscape change.
198. The strategic mitigation measures set out in this section are designed to address the potential 'in-combination' and residual impacts from development allocations within the WHSAP, primarily arising due to the incremental loss of areas of 'poor quality' habitat such as species-poor improved grassland or grazed pasture, but also the potential cumulative loss of connectivity arising through increasing levels of urbanisation. When assessing the impact of a single development, it may be reasonable to assume that loss of small quantities of poor-quality habitat will not result in an impact on the SAC when considered alone. However, such impacts considered at the landscape scale i.e. 'in-combination' with other developments may add up to a more significant impact due to cumulative loss of foraging habitat and connectivity for bats. These in-combination impacts are intangible and difficult to measure, and therefore the approach set out in this section adopts a precautionary approach to ensure adequate strategic mitigation is provided at the landscape-scale.
199. As a starting point, a detailed GIS database will be compiled that identifies specific opportunities within the landscape around Trowbridge for habitat enhancement, restoration and creation, based on known bat use of the landscape; expert opinion from local batworkers; and analysis of aerial photography to identify areas of poor or degraded habitat. It will be important that new habitat creation is planned carefully to avoid negative changes to existing bat habitat. For example, creation of new woodland on a grazed pasture site will need to consider any potential impact to foraging greater horseshoe bat.
200. Specific habitats that will be targeted for enhancement, restoration and creation will include those listed below. The overall principles and objectives for each habitat are set out in Section 8.2 above:
- Woodland – expansion or new blocks. A target minimum of 6 ha will be provided over the period of the WHSAP to reflect actual numbers of new dwellings in greenfield sites that come forward;
 - Hedgerows – gapping up, improved management (tall and bushy with more trees) or new hedgerows with trees. A target minimum 11km of new hedgerow will be planted over the period of the WHSAP to reflect actual numbers of new dwellings in greenfield sites that come forward;
201. All habitat enhancement, restoration and creation must be delivered within the red or yellow bat sensitivity zones.
202. Measures implemented in close proximity to the known important bat roosts will be prioritised over those located at greater distance.

9.1.1 Delivery mechanism and implementation

203. The anticipated delivery mechanism to achieve habitat enhancement, restoration and creation is likely to comprise a number of different options. In the first instance, a Project Officer will be appointed by Wiltshire Council to manage the delivery on the ground, which will be funded by developer contributions (see Appendix 1) and will be appointed once sufficient funds to cover the first year of the post have been identified. This Officer will liaise with Natural England to agree an acceptable programme for delivery of the mitigation strategy.
204. It is envisaged that other habitats (hedgerow and woodland management and creation) will be delivered through a new Bat Stewardship Scheme that will be set up and administered by the Project Officer. Grants will be allocated to individual land owners, dependent on the type and quantum of habitat to be delivered. Funding will be dependent on long-term delivery of habitat management.

205. Additional habitat, particularly new woodland, will be delivered through a variety of means, including contributions towards off-site planting and land acquisition. It is intended that Wiltshire Council would purchase the land with the Project Officer being responsible for woodland establishment. Land would then either be retained by Wiltshire Council or would be passed on to an appropriate organisation for long-term management.
206. In the first instance, the Project Officer will develop a package of work to produce a handbook and agreed Terms of Reference for the Bat Stewardship Scheme. This will set out full details, including the following:
- The area covered by the scheme;
 - How the Bat Stewardship will work in parallel to add to and complement national stewardship schemes;
 - Who will be eligible to apply;
 - What land (and habitats) will be eligible;
 - Criteria to be used for judging submitted applications;
 - How long the agreements will operate;
 - Options for capital works (e.g. new hedgerow planting);
 - Options for management works (e.g. management of hedgerows);
 - What will be paid for each option and when payments will be made;
 - How individual agreements will be monitored and enforced.
207. The Project Officer will be responsible for administration of the scheme, farm visits and liaison with land owners, as well as monitoring and enforcement of agreements; and strategic monitoring across the scheme area.
208. The Project Officer hosted by Wiltshire Council will be responsible for undertaking, or facilitating, the following strategic monitoring:
- Quantum and condition of habitats enhanced or created as part of the scheme for bat target species;
 - Continuing to develop the evidence base within red and yellow zones shown on Figure 4 (e.g. through radio tracking of lesser and greater horseshoe bat);
 - Long-term monitoring of bat populations, particularly numbers of Bechstein's bat associated with the core woodland maternity sites.
209. It is recognised that at this stage, there will be uncertainty in terms of which specific habitat enhancement, restoration or creation opportunities can be delivered and where, as most if not all land is within private ownership; and delivery therefore depends on engagement with land owners. As such, a multitude of potential opportunities will be identified taking a whole landscape approach to ensure there is sufficient scope to deliver the agreed quantum of habitat enhancement, restoration and creation improvements.

9.1.2 Developer contributions for strategic habitat mitigation

210. Any development of new greenfield (namely the WHSAP, neighbourhood plan or exception sites; and other uses consistent with WCS policies) located within the yellow Medium Risk Bat Sensitivity Zone (see Figure 4) must, where appropriate, expect to contribute to strategic habitat mitigation via a section 106 agreement (S106) as follows:
- For residential development, £777 per dwelling, which will be payable through S106;
 - For all other development types, £23,310 per hectare which will be payable through S106.
211. The calculation which sets out the basis for these contributions is set out in full within Appendix 1.

9.2 Recreational Pressure Mitigation

212. The Footprint Ecology Report (November 2018) was commissioned by Wiltshire Council to consider effects of recreation on the nature conservation interest of woodland near to Trowbridge. The report sets out a series of recommended measures aimed at avoiding and mitigating the impacts of increased recreational pressure arising from new residential

development at Trowbridge on important woodland bat sites. The measures that Wiltshire Council intends to take forward through implementation of this document have been summarised below.

213. Footprint Ecology recommends that a 600m exclusion zone is established around important bat woodlands where residential development should be restricted (i.e. no net increase in new residential curtilage within the zone). This recommendation has been implemented in full within this document.
214. Other recommended mitigation and avoidance measures within the Footprint Report that will be adopted through implementation of this Mitigation Strategy have been summarised below. The recommended costed measures to be implemented through this strategy have been itemised separately in Appendix 2. Note that it is the measures set out in Section 9.2.2 that will be the focus of implementation of this Strategy (the measures set out in Section 9.2.1 are critical, however, they will largely be implemented through the s106 agreement associated with the Ashton Park planning permission).
215. It should be noted that new housing allocated through the WHSAP together with other residential development (windfall development in the urban area, neighbourhood plan or rural exception sites) could result in a total of 2107 additional dwellings for an estimated 4,846 people by 2026 (based on the average of 2.3 people per household (Office for National Statistics, 2018) if the WCS requirement is met (see Table 1 above). Working on the basis of 8ha green open space per 1,000 people (Footprint Ecology, November 2018), this means that an extra 38.8 ha of green space capacity needs to be provided in association with this level of additional development. In practice, as reflected in the Footprint Ecology recommended measures, green space capacity can be created through the implementation of different measures. However, due to the need for certainty, a precautionary approach has been taken to calculate the maximum cost per new dwelling, which is based on the creation of a new SANG for the full 38ha (i.e. the costliest measure). This indicates that an allocation of up to £641 per new dwelling would need to be available from the Community Infrastructure Levy to ensure adequate mitigation can be created to accommodate increased recreational pressure from planned housing (See Appendix 2).
216. However, it is likely that Wiltshire Council will adopt a 'mix and match' approach to select a variety of measures for implementation that can best-deliver the required capacity over the next 7 years, including enhancement of existing green spaces and working towards developing a new country park (or SANG) if necessary. The size of any SANG needed would reflect any recreational pressure not addressed through enhancement of existing green spaces. The measures in paragraph 230 may well be more cost effective in delivering reductions in visitors to the woods concerned than by SANG creation alone. The project officer will develop an appropriate method for comparing the efficacy of the measures adopted to ensure that the increased recreational pressures are effectively and adequately mitigated.

9.2.1 Recognising important bat woodlands as nature reserves

9.2.1.1 *Limiting parking*

217. Additional parking in the general vicinity of the woodlands is unlikely to be acceptable due to the increased risk to the bat populations from higher visitor numbers

9.2.1.2 *New interpretation and signage at the woodland bat sites*

218. Interpretation provides information for visitors about the site, while signage informs visitors as to how to behave and helps way-finding. The two can be linked. New interpretation and signage would ensure visitors are aware the sites are important and managed for nature conservation, as distinct from the other greenspace sites which are managed primarily for access. There should be clear instructions/guidance relating to the issues of fires, camping, remaining on paths, dog fouling, dogs off leads etc. Improved way-marking will help people follow particular routes through the woods. As Bechstein's bats regularly move roost sites, it is likely that disturbance will be minimised if the area used for access is minimised. Focusing access on selected paths and reducing desire lines is therefore likely to be beneficial, and good way-marking within the woods may help achieve this.

219. In addition, the Green Lane Wood complex comprising Green Lane Wood, Biss Wood and the Green Lane Nature Park needs careful branding to ensure visitors clearly distinguish between the different purposes of each separate area (i.e. ensuring a clear separation between areas where there is a nature conservation focus and those areas where the focus is access and recreation). This is likely to be resolved through the new iteration of the Green Lane Wood Complex Management Plan which will be funded by the Ashton Park developer following grant of planning permission for Ashton Park. Only in exceptional circumstances would new signage and interpretation be funded through contributions from other developments besides those from Ashton Park.

9.2.1.3 *Improvements to paths within the woodland bat sites*

220. Improvements to path surfacing/routes at woods should also help focus access within the woodland sites and limit desire lines/spread of access within the sites. Improvements should be low key, with the aim of containing access along particular routes and keeping areas of the wood quiet, rather than enhancing the sites to draw more visitors. Improvements to the path network should ensure the woodland sites are more robust in terms of absorbing any changes in recreation use in the future.

221. Given the erratic nature of roost sites and the limited knowledge of the full picture of roost sites in the woods, there is little evidence as to where the paths should be directed. But it is nevertheless recommended that any revisions to the path networks should consider the possible effect of pushing or pulling visitors to different parts of the sites near bat roosts or the habitat potential for roosts. Changes to paths should be agreed in liaison with the expert bat workers who undertake monitoring of roosts and bat boxes within the woods. The principles for locating and maintaining the path network in the Green Lane Wood Complex will likely be considered in the next iteration of the Management Plan. Only in exceptional circumstances would path repairs etc be funded through contributions from other developments besides those from Ashton Park.

9.2.1.4 *Fencing at woodland bat sites*

222. From evidence gathered through stakeholder interviews there is a need for improvements to fencing and new fencing around the woodland sites. Fencing serves two purposes. Management of deer within the woodlands is difficult where there is access, and therefore impacts of deer are likely in the long term to be resolved by keeping deer out rather than culling. This will reduce damage to ground flora, coppice regrowth and overall woodland structure, and is particularly relevant at Biss Woods. Fencing also serves to limit desire lines and stops diffuse access; visitor use is then focused through gates and main paths, meaning signage, interpretation and engagement can be more effectively targeted and visitors are funnelled onto the main paths. This is particularly relevant along the western edge of Green Lane Wood. Fencing principles should be considered in the next iteration of the Management Plan. Only in exceptional circumstances would fencing be funded through contributions from other developments besides those from Ashton Park.

9.2.1.5 *Increased warden presence at woodland bat sites and other greenspace sites*

223. The granting of planning permission for Ashton Park requires the provision of a full-time dedicated warden employed by Wiltshire Wildlife Trust. The warden's duties will be defined in the S106 agreement and will essentially seek to balance visitor and wildlife needs, with particular emphasis on enhancing conditions for Bechstein's bats. There will be an element of policing to avoid informal fire making, camping, dogs being out of control etc but also an emphasis on engagement to foster a fuller appreciation of the sensitivity of the area by local residents and visitors.

9.2.1.6 *Engagement with visitors and the community*

224. Engagement work with visitors and the local community (including schools), will be undertaken by Wiltshire Wildlife Trust through arrangements agreed with Wiltshire Council and the developer through the grant of permission for Ashton Park. Such activities will likely include:

- Information packs to local schools
- Visits to local schools

- Community events
- Engagement events on sites
- Guided walks (e.g. with bat detectors)
- Material on the web, with material on local bats (e.g. showing tracking results)
- Establishing volunteer wardens or ‘ambassadors’ to help spread key messages such as dogs on leads or the need to pick-up dog mess.
- Volunteer groups, for example helping with tree planting

9.2.1.7 *Provision of outdoor learning space for schools*

225. Linked to the previous recommendation, stakeholder interviews highlighted the need for an outdoor learning space for the Castle Mead school and potentially other schools. Local schools already visit the woods and such use is likely to increase in the future, adding to the pressures on the woods. Provision of facilities for the schools will evolve over time and will be funded through the agreements entered into for the Ashton Park and Castle Mead developments. Outdoor learning space would need to be sited away from areas that support bat roots and therefore potentially outside the woodland bat sites, yet woodland cover is ideal for ‘forest schools’. Green Lane Nature Park could be a suitable venue. Equally it may be possible for the scout’s Jubilee Wood to be shared with the school, which already has many of the provisions needed and is developing into a pleasant woodland space. This would require liaison between the school and scout groups.

9.2.2 Infrastructure enhancements to other greenspace sites

226. The visitor surveys targeted a range of greenspace sites away from the bat woodlands. It is clear these are well visited already. Enhancements to these sites could enable them to absorb additional recreational use and for much recreational pressure to be focused on these sites in the future. The visitor survey results provide much information to help guide potential enhancements to draw use away from the woodlands. Dog walking is the main activity at all sites (79% of interviewees) but accounted for a particularly high proportion of visitors at Clanger and Picket Woods (91%). Dog walkers should therefore be a key target group.
227. The visitor survey results show that visitors to the woodland bat sites tended to undertake longer visits compared to other sites (at Biss Wood and Clanger and Picket Woods in particular). The woods also have a relatively high proportion of people visiting infrequently (less than once a month) and at weekends, and therefore it would seem the woods currently draw people who wish to undertake a longer walk and who occasionally make the effort to visit such sites in order to have a longer walk. Clanger has a particular draw for people who come by car, and therefore are making a particular effort to visit. People tended to travel further to Clanger and Picket Woods compared to other sites (potentially reflecting the high proportion of car-users at the site). In contrast, Green Lane Wood has a significantly higher proportion of interviewees who have been visiting for relatively short periods of time, and therefore it is clear that the woodland sites are attracting new visitors and new housing will result in increased levels of use. Routes walked were longer at Clanger and Picket and Green Lane Wood compared to the other sites – at both these locations visitors were typically walking around 2.5km, where none of the other sites had median route lengths above 2km (although Southwick Country Park was just under 2km – the length of the surfaced path.).
228. Looking at the other greenspace sites, Southwick Country Park was notable in the high numbers of people travelling to the site by car, but it is clear that there are sometimes issues at this site with parking capacity, with the current car-park limited to around 40 spaces. While the other non-woodland greenspaces lacked a formal car park for site visitors.
229. ‘Close to home’ was less of a driver influencing site choice at the woodland bat sites compared to other greenspace sites. People appear to select the woods (compared to other sites) because they are good for the dog/dog enjoys it, because they don’t have many other people and because they are relatively quiet (e.g. in respect of traffic noise). The woods also seem to perhaps have more of a rural/wild feel and are more suitable in certain weather conditions (i.e. providing shade). For the other greenspace sites to provide an alternative to the woods, they should therefore be enhanced to provide these characteristics.

230. Ideally the other greenspace sites will function as a network, providing a range of different opportunities, thereby ensuring visitors have a variety of potential sites to visit. Across the network the following features could therefore be provided and maintained (not at all locations but rather at one or more locations), with the aim to enhance access provision and draw visitors away from the woods, taking care not to create too urban a feel across the sites:
- Fenced dog training area, drawing dog walkers with unruly dogs or those with new dogs. For example, at Southwick Country Park, where interviewees suggested dog behaviour is an issue and the improvement could be situated carefully to spread users more.
 - Water for dogs, such as pools or ponds where dogs can swim and have access to water to drink (e.g. at Biss Meadows and Paxcroft Mead).
 - Dog bins at all sites, near/at main access points.
 - Surfaced all weather paths, drawing use in wet weather and when ground conditions are muddy. For example, the western bank of Biss Meadows, which could be encouraged to have more use.
 - Provision of longer walking circuits. Longer routes (at least 2.5km) should encompass relatively quiet areas with rural feel (i.e. without lots of people and noise).
 - A range of parking locations providing safe, off-road parking, easily accessible and with plenty of space to park (i.e. so visitors that do arrive by car can be confident of being able to park). Additional parking provision is necessary to serve Southwick Country Park and could include the main car-park but also outside the country park to provide additional parking at other locations around the site (e.g. near the allotments or from Studley).
 - Café and toilets, particularly at Southwick Country Park, providing for those visitors that wish for such facilities. Café facilities may work to draw visitors who wish to meet socially (e.g. meeting for a walk) and toilets/café may help draw groups. Ideally café facilities should include outdoor seating etc. where dog walkers can sit with their pets.
 - Outdoor gym area/facilities for exercise, potentially drawing users who are seeking to exercise and wishing for space to 'get fit'. Fun, amusing gym like facilities for children and adults are enjoyable and combine health benefits of heart rate simulation, rather than solely low heart rate activities, such as walking.
 - Creation and management of a range of habitats, particularly ensuring a range of wooded habitats and mix of open areas and woodland, providing good space for dog walkers and others potentially currently attracted to the woods.
231. While it appears Southwick Country Park offers good potential for attracting new visitors who might otherwise visit the woodlands, it should be noted the country park is of considerable biodiversity value in its own right. It contains sufficient biodiversity interest to qualify as a Local Nature Reserve and this statutory designation is being pursued by the Council and the Friends of Southwick Country Park with Natural England. The Country Park also has plenty of habitats suitable for foraging, and commuting by all three SAC bat species. It has many older trees suitable for roosting by Bechstein's bats and this species was confirmed in a tree roost at the park in 2016. Southwick Country Park would be regularly used by householders in the three closest HASP allocations. Measures will therefore be required to ensure the additional pressure can be absorbed without presenting additional risks both to SAC bat species and other wildlife. The Council will discuss the best way to deliver these using contributions from development with the Friends of Southwick Country Park.

9.2.3 Signage and interpretation at other greenspace sites

232. Interpretation and signage at other greenspace sites could help to create a different feel and identity from the woodland bat sites, ensuring that visitors recognise a clear distinction between sites where there is nature conservation interest and sites that are primarily managed for access and the benefit of people. Signage and interpretation are likely to help visitors to get the most from their visit.
233. Consistent signage across the other greenspace sites may also help visitors place sites within the context of each other and therefore move more between sites on foot, as there is a feeling of greater connectivity between sites.

9.2.4 Creation of additional green infrastructure (SANG)

234. Suitable Alternative Natural Greenspaces (SANGs) is the term given to greenspaces that are created or enhanced with the specific purpose of absorbing recreation pressure that would otherwise occur at sites designated as European wildlife sites. SANGs are created, or existing greenspaces enhanced to create a SANG, in order to mitigate for the effects of new housing development, absorbing the level of additional recreation pressure associated with the new development.
235. A busy, overcrowded site is unlikely to provide that experience. The extent to which a site feels too busy is likely to be subjective, dependent on the vegetation, views, site lines, noise levels, the shape of the site etc; as such setting a standard for existing sites is a challenge.
236. For a site to be effective as a SANG it must provide an alternative to the site of nature conservation importance that is under pressure, and therefore (at least in part) replicate the experience gained from a visit there. Effective SANGs therefore potentially need to be relatively wild, semi-natural spaces and large.
237. The Footprint Ecology Report found that, currently, the total area of accessible greenspace around Trowbridge is around 278ha, of which 162ha is other greenspace away from the bat woodland sites. Footprint Ecology considered that some enhancement of existing greenspace sites such as Southwick Country Park can be undertaken to increase their capacity and proposed strategic measures for such capacity enhancement are set out above
238. However, the Footprint Ecology Report concluded that the provision of additional green infrastructure needs to be considered in order to meet benchmarks for levels of accessible greenspace available for new residents. As such, there is a recognised need for new greenspace to be provided in association with new residential development at Trowbridge.
239. However, the Footprint Ecology Report also concluded that it should be possible for such additional greenspace land to be phased over time, and as such this is a long-term measure. Nonetheless, additional green infrastructure should be planned well in advance and implemented strategically to maximise its benefit. It will need to be targeted to match the locations where housing will come forward, such that the greenspace is easily accessible.
240. As a starting point, Wiltshire Council will therefore undertake a site search, assessment and feasibility study to allocate suitable land in the Trowbridge area for Suitable Alternative Natural Greenspaces (SANG). Once suitable land has been identified, Wiltshire Council will seek to either acquire land, or ensure that land is secured, for the purposes of delivery of one or more SANGs. All SANGs to be provided must comply with the quality criteria set out in Appendix 3.

9.2.5 Developer contributions for strategic recreational pressure mitigation

241. Any new residential development located within the grey hatched Medium Risk Bat Sensitivity Zone (see Figure 5) will require an allocation from Community Infrastructure Levy to ensure mitigation measure can be created for the increase in recreational pressure. The contribution for such strategic recreational pressure mitigation will be made via CIL as follows:
- For residential development, calculated at £641 per dwelling. Developers will not pay this directly, but it will be calculated annually from the number of housing completions and taken from the CIL receipts
242. The calculation which sets out the basis for these contributions is set out in full within Appendix 2. The costs in Appendix 2 have been based on the establishment of acquiring and establishing a new 38ha SANG and hence reflect a 'maximum worst case' scenario.

10 BIBLIOGRAPHY

- Andrews Ecology Ltd. (2017). *Bat Tree Habitat Key 2017. BTHK – Database Report 2017*. Bridgwater: Andrews Ecology.
- Aspect Ecology. (August 2017). *Report in respect of Bechstein's Bats (including results of the 2013 radio-tracking study)*.
- Bat Conservation Trust. (2009). *BATS AND LIGHTING IN THE UK*. London: Bat Conservation Trust.
- Bat Conservation Trust. (2013). *Bechstein's Bat. An Introduction for Woodland Owners*.
- Bat Conservation Trust. (2016). *Bat Survey Guidelines for Professional Ecologists: Good Practice Guidelines* (3rd ed.).
- Bat Conservation Trust and Institution of Lighting Professionals. (2018). *Guidance Note 08/18. Bats and Artificial Lighting in the UK. Bats and the Built Environment Series*.
- Bat Tree Habitat Key. (2018). *A Guide to Identification and Assessment for Tree-Care and Ecology Professionals*. Pelagic Publishing.
- Bath and North East Somerset Council. (2018). *Waterways Design Guidance Protecting Bats in Waterside Development*.
- Billington, G. (2000). *Radiotracking study of greater horseshoe bats at Mells, near Frome, Somerset*. English Nature, Peterborough.
- Billington, G. (2003). *Radiotracking study of greater horseshoe bats at Buckfastleigh Caves, Site of Special Scientific Interest*. English Nature, Peterborough.
- Bontadina, F. e. (2002). Radio-tracking reveals that lesser horseshoe bats (*Rhinolophus hipposideros*) forage in woodlands. *Journal of Zoology*, 258(3), 281-290.
- Bruce-White, C. S. (2011). *A review of the impact of artificial light on invertebrates*. Retrieved from Buglife: https://www.buglife.org.uk/sites/default/files/A%20Review%20of%20the%20Impact%20of%20Artificial%20Light%20on%20Invertebrates%20docx_0.pdf
- Cohen, K. (2017). *Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016*.
- Cohen, K. (2018). *Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2017*.
- Cohen, K. (2019). *Castlemead s.106 Ecology Monitoring Report 2018 surveys: Green Lane and Biss Woods* .
- Cresswell Associates. (2004). *Bats in the Landscape Project*. The National Trust, Sherborne Park Estate.
- Dekeukeleire, D. e. (2016). Swarming behaviour, catchment area and seasonal movement patterns of the Bechstein's bats: implications for conservation. *Acta Chiropterologica*, 349–358.
- DTA Ecology. (July, 2017). *Shadow Appropriate Assessment under the Habitats Regulations of Ashton Park planning application 15/04736/OUT ADDENDUM*.
- DTA Ecology. (Oct 2016). *Shadow Appropriate Assessment under the Habitats Regulations of Ashton Park planning application 15/04736/OUT*.
- European Council. (1992, May 21). Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.
- Footprint Ecology. (Oct, 2017). *Trowbridge Visitor Survey and Recreation Management Strategy*.
- Fure, A. (2012). Bats and lighting - six years on. *The London Naturalist*, 69-88.
- Harris, G. L. (March 2017). *Mammals in Wiltshire Second Edition*. Wiltshire and Swindon Biological Records Centre, Wiltshire Mammal Group and Wiltshire Bat Group.
- Hill, D. A. (2005). Effectiveness of an acoustic lure for surveying bats in British woodlands. *Mammal Review*.
- Kerth G., W. K. (2001). *Day roost selection in female Bechstein's bats (Myotis bechsteinii): a field experiment to determine the influence of roost temperature*. (Vol. 126). Oecologia.
- Knight, T. (2006). *The use of landscape features and habitats by the lesser horseshoe bat (Rhinolophus hipposideros)*. PhD thesis, University of Bristol.
- Koenig, G. K. (1999). *Fission, Fusion and Non-random Associations in Female Bechstein's Bats (Myotis bechsteinii)* (Vol. Volume 136: Issue 9).
- Miller, H. (2011). *Bechstein's Bat Survey, Final Report, September 2007 - September 2011*. Bat Conservation Trust.
- North Somerset Council. (January 2018). *North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document*.
- Office for National Statistics. (2018, September 20). *Household projections for England, comparisons with other sources: 2001 to 2018*. Retrieved from Office for National Statistics: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/articles/householdprojectionsforenglandcomparisonswithothersources/2001to2018>
- Palmer, E. P. (2013). *A study on the population size, foraging range and roosting ecology of Bechstein's bats at Grafton Wood, SSSI, Worcestershire*. A report to The People's Trust for Endangered Species and Worcestershire Wildlife Trust, by Link Ecology & Swift Ecology.
- Pegasus Group. (August, 2017). *Ashton Park, Trowbridge Environmental Statement - Adendum Volumes 1 & 2* .
- Ransome, R. D. (1997). *The management for greater horseshoe bat feeding areas to enhance population levels*. English Nature Research Reports Number 241.
- Stone, E. (2013). *Bats and lighting: Overview of current evidence and mitigation*. University of Bristol.
- Stone, E. L. (2009). Street lighting disturbs commuting bats. *Curr. Biol.*, 1123-1127.
- Stone, E. L. (2015). The impacts of new street light technologies: experimentally testing the effects on bats of changing from low-pressure sodium to white metal halide. *Philos. T. R. Soc. B*.
- Stone, E. L. (n.d.). Conserving energy at a cost to biodiversity? Impacts of LED lighting on bats. *Glob. Change Biol.*, 2458-2465.
- UK Government. (2017, 10 31). *Conservation of Habitats and Species Regulations 2017* . Retrieved 05 16, 2018, from www.legislation.gov.uk: <http://www.legislation.gov.uk/uksi/2017/1012/contents/made>

UK Government. (2019, 02). *Gov.uk - Publications - National Planning Policy Framework*. Retrieved from www.gov.uk:
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Wiltshire Council. (2015). *Wiltshire Core Strategy. Adopted January 2015*.

Wiltshire Council. (April 2014). *Wiltshire Core Strategy Updated Habitats Regulations Assessment*.

Wiltshire Council. (February, 2018). *Habitats Regulations Assessment, Ashton Park (Final Version)*.

Wiltshire Council. (June, 2017). *Wiltshire Housing Site Allocations Plan Pre-Submission Draft. Assessment under the Habitats Regulations*.

Wiltshire Council. (March, 2018). *Housing Land Supply Statement. Base Date: April 2017*.

Wiltshire Council. (May, 2018). *Addendum to 'Wiltshire Housing Site Allocations Plan Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations'*.

Wiltshire Council. (November, 2017). *Wiltshire Local Plan Review Consultation Paper*.

Wiltshire Council. (September, 2015). *Bat Special Areas of Conservation (SAC). Planning Guidance for Wiltshire*.

Wright, P. G.-W. (2018, August). Genetic structure and diversity of a rare woodland bat *Myotis bechsteinii*: comparison of continental Europe and Britain. *Conservation Genetics*, pp. 777-787.

WSP. (February, 2012). *Wiltshire Core Strategy Submission Draft - Assessment under the Habitats Regulations*.

WSP. (March 2013). *Wiltshire Core Strategy: Assessment under the Habitats Regulations*.

APPENDIX 1 COSTED HABITAT MITIGATION

Habitat	Works	Item	Total minimum target (ha)	Unit cost (£)	Unit	Total cost (£)	Period (years)	Annual cost	Capital cost	Source of costs	Comments on application of grant (3)	Comments on calculation assumptions
Broad-leaved woodland	Woodland creation	Total cost estimate for category	6			282,330		7,680	228,570	2		6 ha of new woodland will be delivered within the risk zones to compensate for residual and in-combination effects arising from development. 6 ha will deliver a 5% increase in the area of the high quality woodland habitat upon which the local Bechstein's population depends.
		Detailed breakdown										
		Land acquisition	6	22,500	per ha	135,000			135,000			At the close of 2017, Savills GB Farmland Value Survey shows average prime arable commanded close to £9,000 per acre, with average grade 3 farmland trading at £7,500 per acre.12 Feb 2018 (https://www.savills.co.uk/research_articles/229130/228020-0)
		Prepare Woodland Creation Plan	6	1,200	per woodl and plan	7,200	N/A		7,200		Assumes woodland will be planted in minimum blocks of 1 ha.	
		Woodland site preparation: subsoiling, fertiliser & herbicide	6	450	per ha	2,700	N/A		2,700	2		
		Hand planting bare-rooted broad-leaves	6	350	per ha	2,100	N/A		2,100	2		
		Additional to fit stakes and tubes to broad-leaves	6	350	per ha	2,100	N/A		2,100	2		
		Materials: bare-rooted trees	6	495	per ha	2,970	N/A		2,970	2		
		Materials: tubes & stakes	6	2,750	per ha	16,500	N/A		16,500	2		
		Deer fencing for new woodland planting	2400	25	per metre	60,000	N/A		60,000	3	Assumes woodland will be planted in minimum blocks of 1 ha.	Estimated costings subject to uplift to allow for contractor OH and profits
		Annual payment to maintain woodland planting	6	1,280	per ha	53,760	7	7,680		3	To include beating up, weeding & herbicide application.	Assumes most maintenance will be required in first 5 years, after which a general annual maintenance payment will be required. Assumes beating up will require replacement of 10% of failures; herbicide 'spot' application will be required 1x per annum in first 5 years; weeding required x 2 in first 5 years.

Hedgerows	Creation	Total cost estimate for category	11 km			349,932		15,554	303,270		Aim is for all restored or newly planted hedgerows to be double fenced to 3m width, with standards. Must include the cost of initial maintenance for 3 years after planting, to include removal of any tree guards and shelters, 'beating up' (replace all failures in the following planting season), and trim the newly planted hedge in at least the first 2 years to encourage bushy growth, allowing the hedge to become taller and wider at each cut	Based on comments from Natural England dated 31/8/18. 11km of new (or 22km of enhanced) hedges – far enough to provide a single new connective corridor from Southwick Country Park to Green lane wood, assuming 100% establishment success rate and a 33% loss over the longer term, and a 1.2 temporal multiplier (assuming hedges are delivering benefits after 5 years):
		Detailed breakdown										
		Excavate trench for hedges	11000m	6.93	per m	76,230	N/A		76,230	2		Trench excavated by machine. Trench 500mm deep x 700mm wide.
		Plant hedge	11000m	9	per m	99,000	N/A		99,000	4		Assumes backfill with excavated topsoil. Assumes hedges to be planted with bare root whips, in a double row with 200mm centres
		Plant standard trees	220 trees	32	per tree	7,040	N/A		7,040	5	1 standard tree per 50m (as per Important Hedgerow criteria in the Hedgerow Regulations)	Assumes light standard (tree girth of 6-8cm) bare root tree in tree pit measuring 600x600mm deep. Includes excavation of pit by machine, fork over bottom of pit, plant tree with roots well spread out, backfill with excavated material, incorporate organic manure, 1 tree stake and 2 ties.
		Stock proof fencing (2 sides)	11000m	5.5	per m	121,000	N/A		121,000	3		
		Initial payment to maintain new hedgerows	11000m	1,414	per km	46,662	3	15,554		3	To include beating up, weeding & herbicide application. Initial maintenance assumed as required for 3 years following planting. Assumes replacement of failures at 10%.	Extrapolated approximately from per ha costs (assumes 1km = 1ha)
Hedgerows	Long-term management	Total cost estimate for category	11km			9240		1,320				
		Detailed breakdown										
		Compliance with hedgerow management specification	16.5km	8	100m	9240	7	1,320		6	Maintain hedges at least 3m tall and 2m wide. Cut no more than 1 year in 3 (leave at least 2/3 of hedges untrimmed each year). Cut between 1st January and 28 February. Cut incrementally, rather than trimming back to the same point, aiming to allow hedges to increase in height and width by several centimetres at each cut	Assumes grant would be paid over a 10 year period. The total 10 year cost has therefore been averaged over the 7 years for which these costings are estimated to cover).
Administration, implementation, enforcement and monitoring						175000		25,000				
		Detailed breakdown										

4 Agro Business Consultants (May, 2018). The Agricultural Budgeting & Costing Book No 86

5 Based on: (Aecom) (Ed) (2016) SPON'S External Works and Landscape Price Book 35th Edition.

6 Based on: Forestry Commission, Natural England (Revised July 2018) Countryside Stewardship Mid Tier Options, Supplements and Capital Items https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/723365/mid-tier-options-supplements-capital-items-2018.pdf

		Part-time project officer				105,000	7	15,000				Assumes £30,000 annual salary, including on-costs. Assumes 2.5 days per week. Costs cover this post for 7 years (the plan period)	
		Fund for monitoring				70,000	7	10,000				e.g. to cover consultant's radio-tracking fees, bat detector equipment	
Contribution Per Dwelling								£777.62	N.B. This equates to £23,310 per ha commercial development (contribution based on the equivalent of 30 dwellings per ha of developed element of the site excluding land set aside for onsite mitigation) to mitigate against in-combination effects on ALL new greenfield developments within the bat sensitivity zones after achieving no net loss on site. To include (but not restricted to) all new developments: within the Sites Allocations plan, Neighbourhood plans, Rural exception sites. The calculation uses the sites allocation figure (1,050) as set out in Table 4)				

General assumptions

Allocations within the Wiltshire Housing Site Allocations Plan will be delivered over the period 2019 to 2026 (and therefore payments for habitat improvement payments will be made during this 7-year period)

The core woodland block area has been calculated by summing the area of Green Lane, Biss and Clanger and Pickett Woods (120 ha in total).

Units as per column headings unless otherwise stated.

APPENDIX 2 COSTED RECREATIONAL PRESSURE MITIGATION

Mitigation measures	Potential location	Approximate total cost	Comments on source of costings	Assumptions for costings
New SANG site				
Land acquisition	Countryside surrounding Trowbridge	£855,000	At the close of 2017, Savills GB Farmland Value Survey shows average prime arable commanded close to £9,000 per acre, with average grade 3 farmland trading at £7,500 per acre.12 Feb 2018. https://www.savills.co.uk/research_articles/229130/228020-0	38 ha of SANG capacity is required in accordance with recommendations in Footprint (November 2018). Trowbridge Visitor Survey and Recreational Mitigation Strategy)
New SANG infrastructure				Costs are very approximate and need to be recalculated on a site-specific basis, using costings requested from contractors.
Surfaced paths	New SANG site	£74,250	Based on: Contractor's pricing (Keffen Civils Groundwork Contractors) for SANG path works in Dorset, 2018	Assume 2.5km of all-weather path suitable for all abilities. Assume paths are 1.8m wide, no edging. 50mm thick self-binding aggregate on 150mm type 1 (crush concrete); non-woven geotextile membrane. Excavated spoil left next to path
Gravel pathways	New SANG site	£37,500	Based on: (Aecom) (Ed) (2016) SPON'S External Works and Landscape Price Book 35th Edition.	Assume 2.5km of less formal gravel path, 1m wide. No edging to path
Signage and interpretation	New SANG site	£17,500	Panter, C., Lake, S., & Liley, D. (2017). Trowbridge Visitor Survey and Recreation Management Strategy. Unpublished report by Footprint Ecology for Wiltshire Council	Costs are very approximate and need to be recalculated on a site-specific basis, using costings requested from contractors. 5 AO interpretation panels at £3000 each. 25 softwood marker posts at £80 per post. £500 for discs made of glass reinforced plastic. Signage needs to be consistent and carefully branded.
Habitat creation (woodland planting)	New SANG site	£47,580	Agro Business Consultants (May, 2018). The Agricultural Budgeting & Costing Book No 86	Assume planting 4 ha. Assume £11,895 per ha, inclusive of ground preparation, planting, materials and deer fencing (cost per ha taken from the habitat enhancement costings spreadsheet)
Car park	New SANG site	£68,399	Based on: (Aecom) (Ed) (2016) SPON'S External Works and Landscape Price Book 35th Edition.	Costs are very approximate and need to be recalculated on a site-specific basis, using costings requested from contractors. No costs included for vegetation clearance, preliminaries or contractor OH/ profits. Assume additional 30 parking spaces provided, and 2 disabled spaces. Assume 440m2 gangway. Assume 130m of block paving edging. Assume 20m Macadam roadway from highway junction for car park.
Dog bins x 3	New SANG site	£450	Panter, C., Lake, S., & Liley, D. (2017). Trowbridge Visitor Survey and Recreation Management Strategy. Unpublished report by Footprint Ecology for Wiltshire Council	
Benches	New SANG site	£12,627	Based on: (Aecom) (Ed) (2016) SPON'S External Works and Landscape Price Book 35th Edition.	Assumes 6 x timber benches; 3 x timber picnic tables. Assumes bolting into existing paving.
Litter bins x 5	New SANG site	£3,300	Based on: (Aecom) (Ed) (2016) SPON'S External Works and Landscape Price Book 35th Edition.	
Promotion to residents	New SANG site	£5,000		
CIL delivery officer	New SANG site	£210,000	Wiltshire Council	Assumes £30,000 annual salary, including on-costs.
Monitoring				
Monitoring visitor numbers.		£20,000	Panter, C., Lake, S., & Liley, D. (2017). Trowbridge Visitor Survey and Recreation Management Strategy. Unpublished report by Footprint Ecology for Wiltshire Council	Across all greenspace sites. Single visitor survey in Year 5
Total		£1,351,606	This applies to new residential development within the residential pressure zone (see Figure 5).	
Per Dwelling Contribution		£641.48	N.B. the calculation uses estimated residential growth (2,107 dwellings) as set out in Table 3.1.	



Most costings provided are generic and where necessary have taken a precautionary approach. Accurate costs can only be calculated on a site-specific basis, taking any site-specific issues into account

APPENDIX 3 DESIGN STANDARDS FOR A SANG

- **Location:** needs to be accessible to residents of new development and potentially existing residents, such that the SANG is at least as easy to access as the European sites
- **Size:** sites ideally need to be in the order of 30ha to provide suitably long routes (visitor data from the European sites are necessary to indicate how far people typically walk). There may be potential to link to other sites or rights of way but ideally such route lengths should be entirely accommodated within the SANG.
- **Routes:** a range of routes should be possible, with longer walks (longer than 2.5km) possible. Routes should be easy to find, ideally way-marked and accessible at all times of year.
- **Types of access:** access provision needs to match the requirements of residents and the types of use on the European sites. Dog walkers are likely to be a major component, but requirements are site specific. There are SANGs in Dorset that are designed entirely for BMX riders.
- **Parking:** If the aim of the SANG is to draw people from a reasonable radius, good quality parking will need to be provided. Car parks need to be of appropriate size, free (assuming it is free to park at the European sites) and safe. Dog-walkers will prefer locations where the dog can be let out of the car safely.
- **Feel:** sites should be welcoming, clearly open to the public for access and safe. Adjacent busy roads, sewage works, industrial sites etc. are likely to detract from the appeal of the sites. SANGs should provide a suitable alternative to the ecologically sensitive sites and are therefore likely to need to be relatively wild and semi-natural in feel.
- **Features:** it may be possible to draw visitors and enhance sites with art installations (e.g. sculptures), infrastructure (screens to view wildlife, viewpoints, wild play facilities, benches etc.), however such features should not lead to the site being too urban in feel.
- **Facilities:** large sites may benefit from toilets, a café etc. but such facilities are unlikely to be essential components. Dog bins may be necessary. Some SANGs (e.g. Upton Country Park in Dorset) have dedicated facilities for dog walkers including a fenced dog training area and a stream area where dogs can drink and access the water).
- **Promotion:** it is important that SANGs are widely promoted to local residents. Good road signs, resident's packs, leaflets and promotion on the internet are important.
- **Management:** SANGs need to be permanent and management (e.g. maintenance, grass cutting, path surfacing) needs to be secured in-perpetuity. Some sites are owned by local authorities, other approaches include management by a trust or a suitable charity such as the local wildlife trust.
- **Monitoring:** visitor surveys of SANGs are likely to be necessary in the early days to check sites are being used and drawing the right types of access. Visitor survey results can provide the feedback necessary to modify or enhance the SANG. Any issues (anti-social behaviour, vandalism, poached ground etc.) need to be picked up and resolved.

Wiltshire Council

Council

25 February 2020

Designation of statutory functions following changes to council structure

Purpose of Report

1. For Council to consider the designation of statutory roles following changes to senior management structure of the council.

Background

2. A report to Cabinet on 19 November 2019 (attached at appendix 1) outlined proposals to change the tier 1 senior management structure of the council.
3. Following a process of consultation with staff and members the new structure was implemented on 13 January 2020.

Main Considerations for the Council

4. The minute of the Cabinet meeting, at which the proposals were approved, is at appendix 2.
5. This outlined the requirement for the Chief Executive Officers to review the designation of some statutory functions following implementation of the new model.
6. Following discussion and agreement with the Head of Paid Service, and after consultation with the Leader ad Cabinet, these recommendations were to be brought to Full Council for approval.

Proposals

7. That Council
 - a) Approve the designation of statutory functions as follows:
 - i. Director of Children's Services (DCS) to the newly created post of Director of Children's Services
 - ii. Returning Officer (RO) and Electoral Registration Officer (ERO) to the Chief Executive Officer – People

- b) Note the appointment of an interim Director of Adult Social Services (DASS) pending further review of where this will sit in the structure by the Chief Executive Officers
- c) Note that other designated statutory roles are unchanged as a result of the restructure and remain with existing postholders namely:
 - i. Director of Public Health (DPH) with the post of Director of Public Health
 - ii. Head of Paid Service with the post of Director of Human Resources and Organisational Development
 - iii. Monitoring Officer with the post of Director of Legal, Electoral and Registration
 - iv. Section 151 with the post of Director of Finance and Procurement
- d) Authorise the Monitoring Officer to make any consequential changes to the Constitution arising from the designation of the statutory functions outlined above.

Joanne Pitt
Head of Paid Service / Director HR&OD

Report author: Paula Marsh, Strategic Delivery Manager, HR&OD

Appendices

Appendix 1a - Cabinet report 19.11.2019

Appendix 1b- Proposed Structure (updated to show DCS role and interim DASS post)

Appendix 2 - Minute of Cabinet meeting 19.11.2019

Proposed Change to the Senior Leadership Structure

Purpose

1. The purpose of this report is to seek Cabinet's approval to take steps to make changes to the senior management structure of the council at tier 1 following discussion with the current Executive Directors.

Background.

2. In July 2018 changes were made to the top tier of the Council which resulted in the interim structure at that time becoming permanent with three Corporate Directors (now Executive Directors) forming the Corporate Leadership Team (CLT), supported in the structure by three statutory Directors with responsibility as Section 151 Officer, Monitoring Officer and Head of Paid Service.
3. In this structure the statutory role of Director of Children's Services (DCS) was designated to the Corporate Director for Children & Education and the statutory role of Director Adult Social Services (DASS) was designated to the Director Adult Social Care & Public Health. The same Corporate Director was also designated as the statutory Electoral Registration Officer (ERO) and Returning Officer (RO).
4. This remains the current structure and the three Executive Director model is now based on the following alignment:
 - i. Children & Education (DCS)
 - ii. Adult Social Care, Public Health & Digital (DASS, ERO& RO)
 - iii. Growth, Investment & Place

Main considerations for Cabinet

5. The current Corporate Leadership Team (CLT) are highly capable and are well supported by the three statutory Directors. There is a strong culture of working in a collaborative way in the wider senior leadership team and they continue to be committed to delivering the Council's vision to create strong communities. I am committed to this vision and together with my new Cabinet we continue to have ambition for a growing local economy and thriving communities.
6. Whilst we have made good progress and we know that Wiltshire has many strengths, I also recognise that we have people in our communities who need our help and support to thrive. I want us to support the most vulnerable people, helping older and disabled people to live independent lives, making sure every child gets a

good start and can thrive in life and protecting everyone from abuse and neglect.

7. We also need to empower our residents and local communities to shape their own futures and we need to play our part in driving economic growth and managing the pressures of growth, supporting the creation of jobs and homes for our future residents, while protecting the quality of life for Wiltshire residents today.
8. I want the best for our residents as they have an important role in enabling a thriving Wiltshire and we can't deliver this without continually reviewing the way the Council works, and that includes the way it is structured.
9. I have now reviewed the current senior leadership structure at tier 1, and I am proposing is to make a change which will reduce the number of Executive Directors from three to two, with responsibility for People and Place. This increased focus on People and Place is consistent with the approach in a large number of large shire and unitary councils.
10. In this proposal it will be important that the two Executive Directors have both the capacity and resilience to enable more focus on strategic planning and in this role less focus on strategic delivery and operational oversight, which is the current position. I am therefore clear that the two Executive Directors should not have statutory responsibility for Adult Social Services (DASS) or Children's Services (DCS), and that these responsibilities should be designated to appropriate Director roles at tier 2.
11. Whilst the statutory guidance for these roles outlines that they should operate at the top tier it also says the roles should report to the Chief Executive. In this proposed structure the Executive Director for People will be accountable to the Council in the same way as a Chief Executive for the performance of these statutory roles and will provide line management to both.
12. By bringing Adult Social Care, Children & Families and Education together with Public Health in this proposal this will remove the current overlap in the strategic planning and in some areas of service delivery and will enable the increasing synergies in these areas to develop. In addition, this will allow a single and consistent relationship with partners and will support the work we are doing to integrate and work more closely with health, as currently the relationships in each area are operating separately.
13. In my proposal the two Executive Directors will continue to be supported by the three statutory Directors (Monitoring Officer, Section 151 Officer & Head of Paid Service) ensuring that appropriate independent advice and challenge is available and in my proposal these roles will be matrix managed by both Executive Directors to ensure the independence of these roles is maintained.
14. The alignment of Directors to these two roles, based on the current tier 2 structure, is outlined in the structure chart in Appendix 1. My proposal to designate the statutory roles of DASS and DCS to Director roles at tier 2 will require a review of roles and responsibilities of some Director roles to ensure compliance with the

statutory guidance, and this review will also include a review of the alignment of the whole tier 2 structure to ensure equity. This review will be the responsibility of the two Executive Directors following discussion and agreement with the Head of Paid Service, and after consultation with the Leader and Cabinet.

15. The proposed change in designation of the above statutory roles will be subject to the approval of Full Council and the constitution will then be amended accordingly. The temporary designation of these statutory roles, as well as the statutory Electoral Registration Officer (ERO) and Returning Officer (RO) pending this review and Council approval, will be discussed with the Executive Directors and agreed with the Head of Paid Service in consultation with the Leader and Cabinet, as part of consultation on the proposed changes to the structure.
16. I have discussed my proposal to change the structure at tier 1 with the current Executive Directors, who agree that the current structure needs to change and that capacity is needed to enable them to focus on working with Cabinet on strategic planning and that the statutory responsibility for DCS and DASS should be designated to roles at tier 2 to enable this. They also agree that the overlap in some service delivery across adult and children social care needs to be addressed and that the synergies that exist in these areas should be further developed under a single Executive Director for People.
17. If this proposal is approved by Cabinet, I will commence formal consultation on the proposal with the Executive Directors and will also seek feedback from all staff at the council. This process of consultation and the process once the structure is confirmed is set out in the Appointments Policy & Procedure and the Redundancy Policy & Procedure for Chief and Senior Officers.

Overview and Scrutiny Engagement

18. Overview and scrutiny members will have the opportunity to comment on the proposal while formal consultation with the Executive Directors takes place and while feedback about the proposal is sought from staff and will be kept informed about the implementation.

Safeguarding Considerations

19. In the proposed changes to the structure the statutory responsibility for Adult Social Services and Children's Services will be designated to Director roles at tier 2, but in both cases the accountability for performance of these statutory roles and line management will be provided by the Executive Director for People, and there will continue to be the expectation that both Executive Directors and all Directors have a role in promoting safeguarding within their specific areas continues.

Public Health Implications

20. There are no public health implications as a result of the proposals outlined.

Environmental and Climate Change Considerations

21. There is no environmental or climate change impacts as a result of the proposals.

Equalities Impact of the Proposal

22. There is no equalities impact as a result of the proposals outlined. The council has in place robust policies and procedures to support change to structures, all of which have been subject to an equalities impact assessment.

Risk Assessment

23. In proposing the senior management re-structure, a number of risks have been considered, namely:

1. **Financial risks**, details in paragraphs 25 - 29
2. **Legal risks**, covered in paragraph 30
3. **Delivery of the business plan**: The risk is that if the new structure is not implemented the council may not be able to deliver the business plan

The current business plan outlines the council's vision and four priorities against which a number of goals outline how these priorities will be delivered. This relies on the Executive Directors having more capacity to work with my Cabinet on strategic planning and providing line management of Directors to deliver these plans.

4. **Short term impact on delivery**: The risk is that there will be a short-term disruption to focus and activity due to uncertainty whilst consultation with the Executive Directors takes place and a new structure, once confirmed, is implemented.

24. Based on the risks outlined above the overall risk is assessed as medium but will be kept under review.

Financial Implications

25. The current 2019/20 base budget approved by Full Council in February 2019 allows for a gross pay budget of £0.615m for three Executive Directors. The proposals will see a reduction in the number of Executive Directors from three to two and therefore a potential reduction in the cost of the top tier structure of approx. £205k.

26. There may be costs associated with the proposed tier 1 structure as a review of market pay for comparable posts will need to take place to ensure the salary for these roles is competitive in the market place. This is important for retention but also for recruitment as and when this may be required. If the market pay suggests that an uplift in salary is needed as a result, then this will be discussed and agreed with the Director, HR & OD in line with the relevant council policies during the consultation on the proposed change to the structure.

27. There may also be costs following a review of the Director roles and responsibilities at tier 2 in order to designate the statutory roles of DASS and DCS and to ensure compliance with the statutory guidance about these roles, but these costs if required will not be determined until this review has been completed.
28. If there are additional costs as a result of the proposed change in the tier 1 structure and because of the proposed change in the designation of the statutory roles of DCS and DASS then it is anticipated that these costs will be met from within the reduction in cost of the proposed top tier structure.
29. The reduction in the number of Executive Director roles will result in one redundancy, the cost of which will not be determined until the formal consultation process has been completed and an application for voluntary redundancy received.

Legal Implications

30. Legal advice will be provided at each stage to ensure that the proposed new structure is implemented lawfully and in accordance with the requirements of the council's policies and procedures, and the constitution.

Options Considered

31. The other option considered was to make no changes to the current structure and maintain three Executive Director roles but as outlined in the report I do not believe that the current structure and designation of the statutory roles of DCS and DASS at tier 1 provides enough capacity to focus on strategic planning. Bringing Adult Social Care, Children and Education and Public Health together under a single Executive Director for People will provide an opportunity to remove the current overlap in some areas of service delivery and will enable the clear synergies in these services to develop. It will also provide a single and consistent relationship with our health partners, as currently the relationships in each area are operating separately.

Proposals

32. I am proposing that Cabinet:

1. Approve the proposed changes to the structure of the council at the top tier (Executive Director), and as outlined in appendix 1 and paragraphs 9 – 14. This is on the understanding that a review of the roles and responsibilities of Directors at tier 2 will be carried out by the Executive Directors to determine the proposed interim and permanent designation of the statutory roles of DCS, DASS, ERO & RO. This will be done following discussion and agreement with the Head of Paid Service, and after consultation with the Leader and Cabinet.
2. Recommend that Full Council approves the proposed permanent

changes to the designation of the statutory roles once this review has been completed.

33. If approved I propose that cabinet note that:

1. Initial consultation on proposals to implement a new structure will start immediately.
2. Once a new structure is confirmed following consultation, that steps to seek approval of the appointment of Executive Directors by the Officer Appointments Committee will take place, and if appropriate steps to approval the redundancy of an Executive Director by the Senior Officers Employment Sub-Committee will also take place.

Cllr Philip Whitehead
Leader of the Council

Appendices

Appendix 1 – Proposed tier 1 structure

Corporate Leadership Team (CLT)

Chief Executive Officer,
People
RO / ERO

Chief Executive Officer,
Place

Ian Gibbons
Director Legal, Electoral &
Registration Services
Monitoring Officer

Jo Pitt
Director HR & OD
Head of Paid Service

Deborah Hindson (Interim)
Director Finance &
Procurement
Section 151 Officer

Sam Fox
Director Economic
Development & Planning

Parvis Khansari
Director Highways
& Environment

Simon Hendey
Director Housing
& Commercial

Jessica Gibbons
Director Communities &
Neighbourhood Services

Emma Legg
Director Access &
Reablement

Vacant
Director of
Children's Services
DCS

Claire Edgar
Director Adult Care,
Learning, Disabilities &
Mental Health

Lucy Townsend
Director Families &
Children

Tracy Daszkiewicz
Director Public Health
DPH

Helean Hughes
Director
Education & Skills

Alison Elliot
Interim Director of Adult
Social Services
DASS

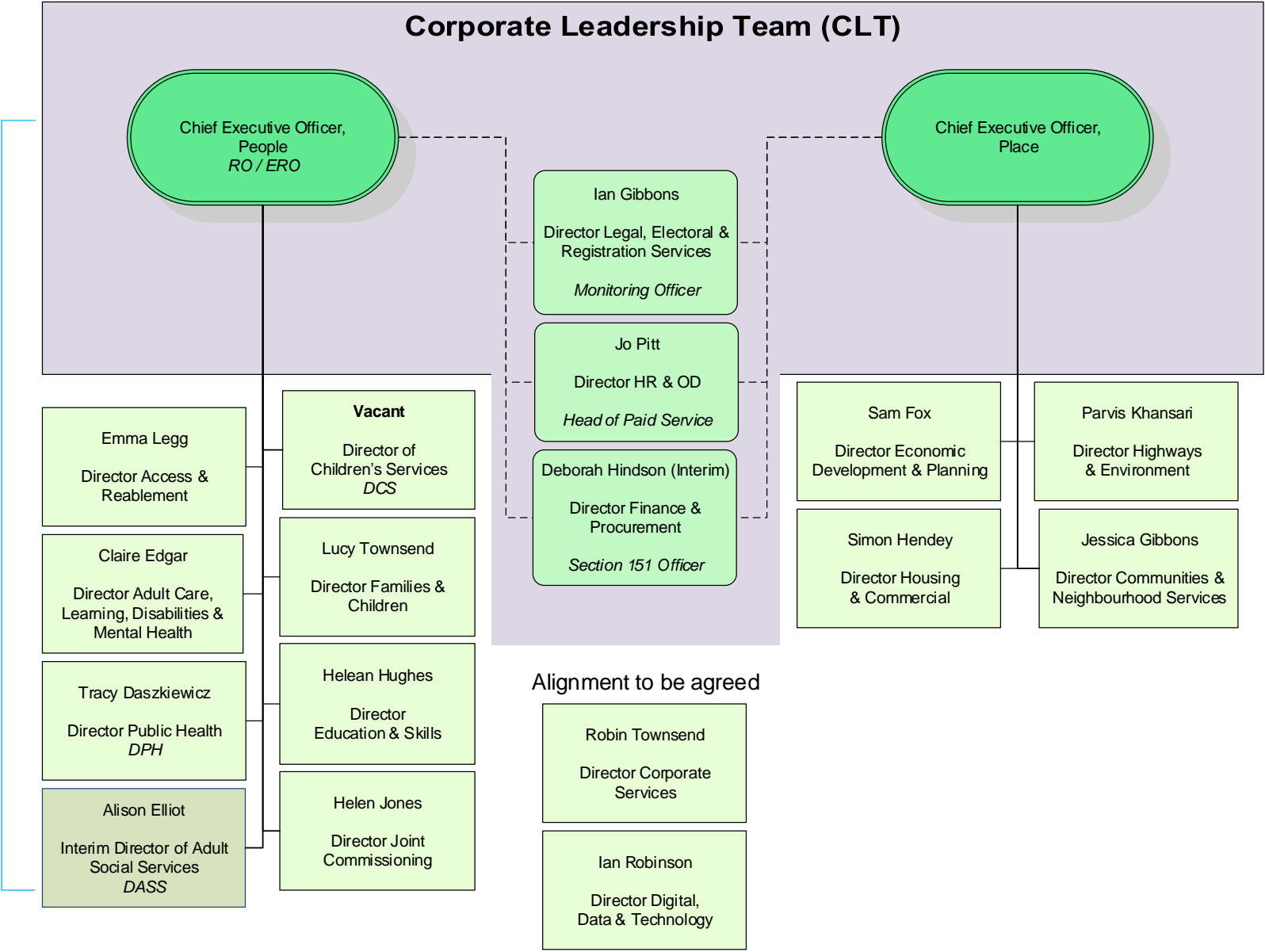
Helen Jones
Director Joint
Commissioning

Alignment to be agreed

Robin Townsend
Director Corporate
Services

Ian Robinson
Director Digital,
Data & Technology

Extended Corporate Leadership Team



This page is intentionally left blank

EXTRACT FROM THE MINUTES OF THE CABINET MEETING HELD ON 19 NOVEMBER 2019.

164 Proposed Change to the Senior Leadership Structure

The Leader of the Council presented a report seeking Cabinet's approval to take steps to make changes to the senior management structure of the Council at tier 1 following discussion with the current Executive Directors.

Resolved:

1. That Cabinet:

- a) **Approve the proposed changes to the structure of the council at the top tier (Executive Director), and as outlined in appendix 1 and paragraphs 9 – 14. This is on the understanding that a review of the roles and responsibilities of Directors at tier 2 will be carried out by the Executive Directors to determine the proposed interim and permanent designation of the statutory roles of DCS, DASS, ERO & RO. This will be done following discussion and agreement with the Head of Paid Service, and after consultation with the Leader and Cabinet.**
- b) **Recommend that Full Council approves the proposed permanent changes to the designation of the statutory roles once this review has been completed.**

2. If approved, the Leader of the Council proposes that cabinet note that:

- a) **Initial consultation on proposals to implement a new structure will start immediately.**
- b) **Once a new structure is confirmed following consultation, that steps to seek approval of the appointment of Executive Directors by the Officer Appointments Committee will take place, and if appropriate steps to approval the redundancy of an Executive Director by the Senior Officers Employment Sub-Committee will also take place.**

Reason for Decision:

The proposed changes will reduce the number of Executive Directors from three to two, with responsibility for People and Place. This increased focus on People and Place is consistent with the approach in a large number of large shire and unitary councils and will align with Council priorities.

(Note:

1. The Cabinet received legal advice from the Council's Monitoring Officer in relation to those members and officers allowed to remain in the meeting for the discussion on this matter.
2. Cllr Hubbard expressed his disappointment at not being able to access the exempt report and attend the discussion, as had been permitted during similar items previously considered by Cabinet and he felt that the process was not transparent and open at this stage.)

Wiltshire Council

Council

25 February 2020

Notice of Motion No.18 – EU Citizens resident in Wiltshire are welcome here

From Councillors Brian Mathew and Ian Thorn

To consider the following motion submitted in accordance with the constitution:

Introduction

EU citizens resident in Wiltshire of whom there are in excess of 7,500 registered to vote, make an invaluable contribution to the life of our County and Country including our businesses, the delivery of our public services, and to wider public life, estimated in purely financial Terms at £17.25 Million per year*. They are very welcome here and should be encouraged to stay

*[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741926/Final EEA report.PDF](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741926/Final_EEA_report.PDF)

Proposal

We request that Wiltshire Council investigates and initiates further and enhanced communication with EU residents living in Wiltshire stating that they are welcome, acknowledging and congratulating the 8,590 that have already signed up and encouraging those who have not yet done so to stay, by applying for settlement or pre-settlement status and setting out how they can do that by going to

www.gov.uk/settled-status-eu-citizens-families.

This page is intentionally left blank

Wiltshire Council

Council

25 February 2020

Notice of Motion No.19 – Herbicides

From Councillors Ian Thorn and Ruth Hopkinson

To consider the following motion submitted in accordance with the constitution:

Introduction

Wiltshire Council controls weeds on its rural verges by flailing and pulling. Urban shrub beds and certain amenity areas are strimmed to control weed growth. The Sparkle Gangs and Parish Stewards all undertake manual weed removal.

The Council uses pavement and road sweepers to manually remove weeds. The council has purchased two weed rippers this year to enhance that service.

It also uses a glyphosate-based herbicide which is increasingly associated with several forms of cancer. It has been banned or restricted in many countries including France, Denmark and The Netherlands. Many UK local authorities are seeking ways to phase out the use of glyphosate-based herbicides. Others have voted to totally phase out its use.

Proposal

This Council calls on the administration to set out a plan that will actively consider alternatives and a timetable for the end of the use of glyphosate-based herbicides.

This page is intentionally left blank

Wiltshire Council

Full Council

25 February 2020

Subject: Appointments to the Local Pension Board

**Cabinet Member: Councillor Simon Jacobs
Cabinet Member for Finance and Procurement**

Key Decision: Non-Key

Executive Summary

Two vacancies have arisen on the Local Pension Board, to which Council appoints membership as the Administering Authority. The report sets out the recruitment process undertaken and recommends appointments to Council.

Proposal

That Council appoints

- a) Paul Smith to the Local Pension Board for a four year term as an Employer Member Representative.
- b) Mark Spilsbury to the Local Pension Board for a four year term as Independent Chairman.

Reason for Proposal

To ensure compliance with the Public Sector Pension Act (2013) along with the Local Government Pension Scheme (Amendment Governance) Regulations 2015.

**Alistair Cunningham OBE
Chief Executive Officer**

Wiltshire Council

Full Council

25 February 2020

Subject: Appointments to the Local Pension Board

**Cabinet Member: Councillor Simon Jacobs
Cabinet Member for Finance and Procurement**

Key Decision: Non-Key

Purpose of Report

1. To report to Council the outcome of a selection process for the Local Pension Board, and seek Council's endorsement for the appointment as set out in the recommendation above.

Background

2. Under the Public Service Pensions Act 2013 and consequent amendments to the Local Government Pension Scheme Regulations 2013, each administering authority is required to appoint a local pension board to assist the administering authority to comply with relevant legislation and guidance, and to ensure the effective and efficient governance and administration of the Local Government Pension Scheme. Such Boards are constituted entirely under the Public Service Pensions Act 2013 and are not local authority committees, membership is as defined in the Public Service Pensions Act 2013.
3. The term of office of an Employer Member Representative on the Board has come to an end in February 2020. The current Chairman's term of office had been extended to allow for continuity during the training of other members in 2019/20, now this period is complete the current Chairman will now step back from the role.

Main Considerations for the Council

4. An appointment process has been undertaken in line with the Local Pension Board Terms for Reference. Paul Smith, of Swindon Borough Council, has been selected for appointment to represent 'Group 2' of employers within the Fund which includes Swindon Borough Council and Wiltshire Police. Mark Spilsbury has been selected as the Independent non-voting Chairman.
5. The appointment of Paul Smith will take place with immediate effect, the appointment of the Chairman will take effect from 1st April 2020, when the current Chair is to step down.

Safeguarding Implications

6. There are no safeguarding implications.

Public Health Implications

7. There are no public health implications.

Procurement Implications

8. There are no Procurement implications

Equalities Impact of the Proposal

9. There are no equalities implications.

Environmental and Climate Change Considerations

10. There are no environmental implications.

Financial Implications

11. There are no financial risks associated with these appointments.
12. The Independent Chairman receives an allowance which is forecasted within the Administration Budget, in addition to expenses for other members.

Legal Implications

13. Vacancies are required to be filled to ensure the Council fulfils its statutory duties as administering authority under the Public Sector Pension Act (2013) along with the Local Government Pension Scheme (Amendment Governance) Regulations 2015.

Conclusions

14. In order to ensure the effective operation of the Local Pension Board, it is recommended the appointment is confirmed, in accordance with the process outlined in the Board's Terms of Reference.

Deborah Hindson
(Interim Director of Finance and Procurement)

Report Author: Libby Johnstone, Democratic Governance Manager
libby.johnstone@wiltshire.gov.uk / 01225 718214

Background Papers - None

This page is intentionally left blank

Wiltshire Council

Full Council

25 February 2020

Review of Proportionality and Allocation of Seats on Committees to Political Groups

Introduction

1. Following changes in the number of seats held by individual groups on the Council, a request has been received from the Leader of the Independent Group for a review of the allocation of seats to political groups. The report also includes the outcome of the by-election in the Trowbridge Lambrook Division on 28 November 2019 which has taken place since the last meeting of Council, and incorporates a change in political balance at Swindon Borough Council for the relevant committees.
2. This report guides the Council through the legal requirements in allocating seats to the political groups.

Review of Allocation of Seats to Political Groups

Legal Position

3. Under the Local Government & Housing Act 1989 (“the Act”) and subsequent Regulations, (“the Regulations”), the Council must review the representation of the different political groups on committees when requested to do so by a leader of a political group where changes have occurred in the size of political groups.
4. It is open to the Council when carrying out a review to adopt some arrangement other than that prescribed by the Act and the Regulations. Notice of such a proposal would have to be given in the Summons, and a decision would need to be made with no one voting against it. The remainder of this report assumes that the Council will not want an alternative arrangement to that prescribed by law.

Political Groups

5. There are currently 4 political groups on the Council. The respective strengths of those Groups following these changes are as follows:

Name of Group	Number of councillors
Conservative	64*
Liberal Democrat	21
Independent	10

Labour	3
--------	---

* The divisions Till and Wylve Valley, and Bybrook are currently vacant and the outcomes of byelections will be considered at a future meeting.

6. Under the regulations, two or more councillors may form and register a group.
7. This report has been prepared on the basis of the strengths of the various political groups set out in paragraph 5.

Principles

8. The Act sets out four principles which must be followed so far as reasonably practicable. They are:
 - (a) *Preventing domination by a single group:* All the seats on a committee should not be allocated to the same political group.
 - (b) *Ensuring a majority group enjoys a majority on all committees:* If one political group has a majority in the full Council, that political group should have a majority on each committee.
 - (c) *Aggregating all committee places and allocating fair shares:* Subject to the above two principles, the total number of seats on all the committees of the Authority allocated to each political group should be in the same proportion as that political group's seats on the full Council.
 - (d) *Ensuring as far as practicable fairness on each committee:* Subject to the above three principles, the number of seats on each committee of the Authority allocated to each political group should be in the same proportion as that political group's seats on the full Council.

Application of Principles

9. The Council must review the establishment of its committees in accordance with the principles laid down in the Act. Immediately after this is done, each political group should state the names of the councillors it wishes to take its allocated places on committees, including substitutes, and when those wishes are known, the Council is under a duty to make the appointment of those councillors as soon as practicable. It is a legal requirement however that the Council formally approves the appointment of councillors to committees and therefore it is essential that each political group notifies Democratic Services of their nominated councillors to serve on committees, preferably before the Council meeting. Group Leaders may also wish to bear in mind the advantages of achieving a geographical spread of appointees.

Councillors not in a Political Group

10. In the case of councillors who are not members of a political group, a proportion of seats on committees equal to the proportion of Council members who do not belong

to a political group has to be reserved, with appointments to these seats being made by the Council at its discretion. There are no ungrouped councillors at this time.

Joint Committees

11. The Police and Crime Panel constituted under the Police and Social Responsibility Act 2011 is a committee of Swindon and Wiltshire and the two councils are required to meet a “balanced appointment objective” whereby members reflects both the geographical and political nature of the two councils plus the skills and experiences required to fulfil the Panel’s functions. Wiltshire’s PCP comprises 11 councillors, plus two independent members, with the ratio of councillors 7:4 in favour of Wiltshire.
12. The membership of the PCP must reflect the political proportionality of the two councils when taken together.
13. Swindon’s current political composition is as follows:

Conservative: 32
 Lib Dem: 2
 Labour: 23

14. When taken with the political composition of Wiltshire the breakdown is as follows:

Conservative	96	7 seats (6.813)
Lib Dem	23	1 seats (1.632)
Labour	26	2 seats (1.845)
Independent	10	1 seats (0.710)

Swindon is entitled to appoint 2 Conservatives and 2 Labour councillors, leaving Wiltshire to appoint 5 Conservatives, 1 Lib Dem and 1 Independent. There is therefore no change to the proportionality of this committee.

15. The Wiltshire Pension Fund Committee must also reflect the proportionality of both Wiltshire and Swindon Borough Council when taken together. The Committee is constituted of 5 Wiltshire Councillors, 2 Swindon councillors, 2 voting and 2 non-voting representatives.
16. When taken with the political composition of Wiltshire the breakdown is as follows:

Conservative	96	4 seats (4.335)
Lib Dem	23	1 seat (1.039)
Labour	26	1 seat (1.174)
Independent	10	1 seat (0.452)

Swindon is entitled to appoint 1 Conservative and 1 Labour councillors, leaving Wiltshire to appoint 3 Conservatives, 1 Lib Dem and 1 Independent member. There is therefore no change to the proportionality of this committee.

Method to Calculate Places

17. The principles in paragraph 8 can be applied in the following sequence:
 - (i) Calculate the total number of seats with votes on all the ordinary committees and any Joint Committees.
 - (ii) Calculate the proportion that each political group forms of the total membership of the Authority. Reserve an appropriate number of seats for ungrouped members.
 - (iii) Apply those proportions to the total number of ordinary committee seats to give the aggregate entitlement of each group; the requirement to apply the proportions “so far as reasonably practicable” can be met by rounding down fractional entitlements of less than half, and rounding up entitlements of a half or more; if this results in a greater aggregate than the number of seats available, the fractional entitlement(s) closest to a half should be rounded in the other direction until entitlements balance the available seats.
 - (iv) Apply the proportions to the number of councillors on each ordinary committee to give provisional entitlement to seats on that committee.
 - (v) If the provisional entitlement gives only one group seats on the committee, adjust the entitlement so that the next largest group has a seat (thus applying principle (a) in paragraph 8).
 - (vi) Finally, adjust the seats on each committee so that the total allocated to each group is as near as possible to their aggregate entitlement, whilst preserving the results reached at steps (iv) and (v) (thus applying principle (c) in paragraph 8).
18. The Council is free to adopt any aggregate number of places on ordinary committees so long as it follows the principles in paragraph 8 and the sequence in paragraph 17.
19. Attached to this report at Appendix A is a numerical guide to proportional representation on Committees based on the respective strengths of the political groups set out in paragraph 5.
20. This indicates that the net effect of the change in political group sizes is that the Independent Group gain two seats from the Conservative Group. A draft scheme of committee places (Appendix B) is proposed.
21. The allocation of seats to political groups on the Fire Authority is not affected.

Matters for Decision

22. The Council is asked:
- (a) To note this report and the legal requirements.
 - (b) To confirm the aggregate number and the draft scheme of committee places available to members of the Council as set out in Appendix B.
 - (c) To make those changes to the appointment of councillors and substitutes to serve on those committees in accordance with the revised scheme of committee places, until the next occasion membership is reviewed under the provisions of the Local Government & Housing Act 1989.
 - (d) In accordance with Part 3 of the Constitution, to ratify the appointment of Cllr Jo Trigg to Trowbridge Area Board.

Robin Townsend
Director Corporate Function

Report Author: Libby Johnstone- Democratic Governance Manager

Unpublished documents relied upon in the production of this report: NONE

Appendices

Appendix A – Numerical Guide to political proportionality
Appendix B – Draft Scheme of Committee Places

This page is intentionally left blank

SCHEDULE

Proportional Representation Table

Total: 98 *Vacant Seat

	Conservative*	Liberal Democrat	Labour	Ind	Ungrouped	
	64	21	3	10	0	
1	0.653	0.214	0.031	0.102	0.000	1.00
2	1.306	0.429	0.061	0.204	0.000	2.00
3	1.959	0.643	0.092	0.306	0.000	3.00
4	2.612	0.857	0.122	0.408	0.000	4.00
5	3.265	1.071	0.153	0.510	0.000	5.00
6	3.918	1.286	0.184	0.612	0.000	6.00
7	4.571	1.500	0.214	0.714	0.000	7.00
8	5.224	1.714	0.245	0.816	0.000	8.00
9	5.878	1.929	0.276	0.918	0.000	9.00
10	6.531	2.143	0.306	1.020	0.000	10.00
11	7.184	2.357	0.337	1.122	0.000	11.00
12	7.837	2.571	0.367	1.224	0.000	12.00
13	8.490	2.786	0.398	1.327	0.000	13.00
14	9.143	3.000	0.429	1.429	0.000	14.00
15	9.796	3.214	0.459	1.531	0.000	15.00
16	10.449	3.429	0.490	1.633	0.000	16.00
17	11.102	3.643	0.520	1.735	0.000	17.00
18	11.755	3.857	0.551	1.837	0.000	18.00
19	12.408	4.071	0.582	1.939	0.000	19.00
20	13.061	4.286	0.612	2.041	0.000	20.00
21	13.714	4.500	0.643	2.143	0.000	21.00
22	14.367	4.714	0.673	2.245	0.000	22.00
23	15.020	4.929	0.704	2.347	0.000	23.00
24	15.673	5.143	0.735	2.449	0.000	24.00
25	16.327	5.357	0.765	2.551	0.000	25.00
26	16.980	5.571	0.796	2.653	0.000	26.00
27	17.633	5.786	0.827	2.755	0.000	27.00
28	18.286	6.000	0.857	2.857	0.000	28.00
29	18.939	6.214	0.888	2.959	0.000	29.00
30	19.592	6.429	0.918	3.061	0.000	30.00
31	20.245	6.643	0.949	3.163	0.000	31.00
32	20.898	6.857	0.980	3.265	0.000	32.00
33	21.551	7.071	1.010	3.367	0.000	33.00
34	22.204	7.286	1.041	3.469	0.000	34.00
35	22.857	7.500	1.071	3.571	0.000	35.00
36	23.510	7.714	1.102	3.673	0.000	36.00
37	24.163	7.929	1.133	3.776	0.000	37.00
38	24.816	8.143	1.163	3.878	0.000	38.00
39	25.469	8.357	1.194	3.980	0.000	39.00
40	26.122	8.571	1.224	4.082	0.000	40.00
41	26.776	8.786	1.255	4.184	0.000	41.00
42	27.429	9.000	1.286	4.286	0.000	42.00
43	28.082	9.214	1.316	4.388	0.000	43.00
44	28.735	9.429	1.347	4.490	0.000	44.00
45	29.388	9.643	1.378	4.592	0.000	45.00
46	30.041	9.857	1.408	4.694	0.000	46.00
47	30.694	10.071	1.439	4.796	0.000	47.00
48	31.347	10.286	1.469	4.898	0.000	48.00
49	32.000	10.500	1.500	5.000	0.000	49.00
50	32.653	10.714	1.531	5.102	0.000	50.00
51	33.306	10.929	1.561	5.204	0.000	51.00
52	33.959	11.143	1.592	5.306	0.000	52.00
53	34.612	11.357	1.622	5.408	0.000	53.00
54	35.265	11.571	1.653	5.510	0.000	54.00
55	35.918	11.786	1.684	5.612	0.000	55.00
56	36.571	12.000	1.714	5.714	0.000	56.00
57	37.224	12.214	1.745	5.816	0.000	57.00
58	37.878	12.429	1.776	5.918	0.000	58.00
59	38.531	12.643	1.806	6.020	0.000	59.00
60	39.184	12.857	1.837	6.122	0.000	60.00
61	39.837	13.071	1.867	6.224	0.000	61.00
62	40.490	13.286	1.898	6.327	0.000	62.00
63	41.143	13.500	1.929	6.429	0.000	63.00
64	41.796	13.714	1.959	6.531	0.000	64.00
65	42.449	13.929	1.990	6.633	0.000	65.00
66	43.102	14.143	2.020	6.735	0.000	66.00
67	43.755	14.357	2.051	6.837	0.000	67.00
68	44.408	14.571	2.082	6.939	0.000	68.00
69	45.061	14.786	2.112	7.041	0.000	69.00
70	45.714	15.000	2.143	7.143	0.000	70.00
71	46.367	15.214	2.173	7.245	0.000	71.00
72	47.020	15.429	2.204	7.347	0.000	72.00
73	47.673	15.643	2.235	7.449	0.000	73.00
74	48.327	15.857	2.265	7.551	0.000	74.00
75	48.980	16.071	2.296	7.653	0.000	75.00
76	49.633	16.286	2.327	7.755	0.000	76.00
77	50.286	16.500	2.357	7.857	0.000	77.00
78	50.939	16.714	2.388	7.959	0.000	78.00
79	51.592	16.929	2.418	8.061	0.000	79.00
80	52.245	17.143	2.449	8.163	0.000	80.00
81	52.898	17.357	2.480	8.265	0.000	81.00
82	53.551	17.571	2.510	8.367	0.000	82.00
83	54.204	17.786	2.541	8.469	0.000	83.00
84	54.857	18.000	2.571	8.571	0.000	84.00
85	55.510	18.214	2.602	8.673	0.000	85.00
86	56.163	18.429	2.633	8.776	0.000	86.00
87	56.816	18.643	2.663	8.878	0.000	87.00
88	57.469	18.857	2.694	8.980	0.000	88.00
89	58.122	19.071	2.724	9.082	0.000	89.00
90	58.776	19.286	2.755	9.184	0.000	90.00
91	59.429	19.500	2.786	9.286	0.000	91.00

	Conservative*	Liberal Democrat	Labour	Ind	Ungrouped	
	64	21	3	10	0	
92	60.082	19.714	2.816	9.388	0.000	92.00
93	60.735	19.929	2.847	9.490	0.000	93.00
94	61.388	20.143	2.878	9.592	0.000	94.00
95	62.041	20.357	2.908	9.694	0.000	95.00
96	62.694	20.571	2.939	9.796	0.000	96.00
97	63.347	20.786	2.969	9.898	0.000	97.00
98	64.000	21.000	3.000	10.000	0.000	98.00
99	64.653	21.214	3.031	10.102	0.000	99.00
100	65.306	21.429	3.061	10.204	0.000	100.00
101	65.959	21.643	3.092	10.306	0.000	101.00
102	66.612	21.857	3.122	10.408	0.000	102.00
103	67.265	22.071	3.153	10.510	0.000	103.00
104	67.918	22.286	3.184	10.612	0.000	104.00
105	68.571	22.500	3.214	10.714	0.000	105.00
106	69.224	22.714	3.245	10.816	0.000	106.00
107	69.878	22.929	3.276	10.918	0.000	107.00
108	70.531	23.143	3.306	11.020	0.000	108.00
109	71.184	23.357	3.337	11.122	0.000	109.00
110	71.837	23.571	3.367	11.224	0.000	110.00
111	72.490	23.786	3.398	11.327	0.000	111.00
112	73.143	24.000	3.429	11.429	0.000	112.00
113	73.796	24.214	3.459	11.531	0.000	113.00
114	74.449	24.429	3.490	11.633	0.000	114.00
115	75.102	24.643	3.520	11.735	0.000	115.00
116	75.755	24.857	3.551	11.837	0.000	116.00
117	76.408	25.071	3.582	11.939	0.000	117.00
118	77.061	25.286	3.612	12.041	0.000	118.00
119	77.714	25.500	3.643	12.143	0.000	119.00
120	78.367	25.714	3.673	12.245	0.000	120.00
121	79.020	25.929	3.704	12.347	0.000	121.00
122	79.673	26.143	3.735	12.449	0.000	122.00
123	80.327	26.357	3.765	12.551	0.000	123.00
124	80.980	26.571	3.796	12.653	0.000	124.00
125	81.633	26.786	3.827	12.755	0.000	125.00
126	82.286	27.000	3.857	12.857	0.000	126.00
127	82.939	27.214	3.888	12.959	0.000	127.00
128	83.592	27.429	3.918	13.061	0.000	128.00
129	84.245	27.643	3.949	13.163	0.000	129.00
130	84.898	27.857	3.980	13.265	0.000	130.00
131	85.551	28.071	4.010	13.367	0.000	131.00
132	86.204	28.286	4.041	13.469	0.000	132.00
133	86.857	28.500	4.071	13.571	0.000	133.00
134	87.510	28.714	4.102	13.673	0.000	134.00
135	88.163	28.929	4.133	13.776	0.000	135.00
136	88.816	29.143	4.163	13.878	0.000	136.00
137	89.469	29.357	4.194	13.980	0.000	137.00
138	90.122	29.571	4.224	14.082	0.000	138.00
139	90.776	29.786	4.255	14.184	0.000	139.00
140	91.429	30.000	4.286	14.286	0.000	140.00
141	92.082	30.214	4.316	14.388	0.000	141.00
142	92.735	30.429	4.347	14.490	0.000	142.00
143	93.388	30.643	4.378	14.592	0.000	143.00
144	94.041	30.857	4.408	14.694	0.000	144.00
145	94.694	31.071	4.439	14.796	0.000	145.00
146	95.347	31.286	4.469	14.898	0.000	146.00
147	96.000	31.500	4.500	15.000	0.000	147.00
148	96.653	31.714	4.531	15.102	0.000	148.00
149	97.306	31.929	4.561	15.204	0.000	149.00
150	97.959	32.143	4.592	15.306	0.000	150.00
151	98.612	32.357	4.622	15.408	0.000	151.00
152	99.265	32.571	4.653	15.510	0.000	152.00
153	99.918	32.786	4.684	15.612	0.000	153.00
154	100.571	33.000	4.714	15.714	0.000	154.00
155	101.224	33.214	4.745	15.816	0.000	155.00
156	101.878	33.429	4.776	15.918	0.000	156.00
157	102.531	33.643	4.806	16.020	0.000	157.00
158	103.184	33.857	4.837	16.122	0.000	158.00
159	103.837	34.071	4.867	16.224	0.000	159.00
160	104.490	34.286	4.898	16.327	0.000	160.00
161	105.143	34.500	4.929	16.429	0.000	161.00
162	105.796	34.714	4.959	16.531	0.000	162.00
163	106.449	34.929	4.990	16.633	0.000	163.00
164	107.102	35.143	5.020	16.735	0.000	164.00
165	107.755	35.357	5.051	16.837	0.000	165.00
166	108.408	35.571	5.082	16.939	0.000	166.00
167	109.061	35.786	5.112	17.041	0.000	167.00
168	109.714	36.000	5.143	17.143	0.000	168.00
169	110.367	36.214	5.173	17.245	0.000	169.00
170	111.020	36.429	5.204	17.347	0.000	170.00
171	111.673	36.643	5.235	17.449	0.000	171.00
172	112.327	36.857	5.265	17.551	0.000	172.00
173	112.980	37.071	5.296	17.653	0.000	173.00
174	113.633	37.286	5.327	17.755	0.000	174.00
175	114.286	37.500	5.357	17.857	0.000	175.00
176	114.939	37.714	5.388	17.959	0.000	176.00
177	115.592	37.929	5.418	18.061	0.000	177.00
178	116.245	38.143	5.449	18.163	0.000	178.00
179	116.898	38.357	5.480	18.265	0.000	179.00
180	117.551	38.571	5.510	18.367	0.000	180.00
181	118.204	38.786	5.541	18.469	0.000	181.00
182	118.857	39.000	5.571	18.571	0.000	182.00
183	119.510	39.214	5.602	18.673	0.000	183.00
184	120.163	39.429	5.633	18.776	0.000	184.00

SCHEDULE OF COMMITTEE PLACES

February 2020

Committee	Total Number of Places for Elected Members	Conservative Group Allocation (64 seats)*	Liberal Democrat Group Allocation (21 seats)	Labour Group Allocation (3 seats)	Independent Group Allocation (10 seats)
Strategic Planning	11	7	3	0	1
Area Planning Committees					
North	11	8	3	0	0
South	11	7	1	1	2
East	8	7	0	0	1
West	11	7	3	0	1
Licensing	12	8	3	0	1
Electoral Review	10	6	2	1	1
Overview and Scrutiny Management	15	9 (-1)	3	1	2 (+1)
Children's Select	13	8 (-1)	3	0	2 (+1)
Environment Select	13	8	3	1	1
Health Select	13	8	3	0	2
Standards	11	7	3	0	1
Police and Crime Panel	7	5	1	0	1

Audit	11	7	2	1	1
Appeals	8	5	2	0	1
Staffing Policy	9	6	2	1	0
Officer Appointments	5	4	1	0	0
Pension Fund	5	3	1	0	1
TOTALS:	184	120 (-2) (120.163)	39 (39.429)	6 (5.663)	19 (+2) (18.776)

*Vacant seats