

## **APPENDIX 2**

# **Wiltshire Housing Site Allocations Plan**

## **Topic Paper 1: Settlement Boundary Review Methodology**

June 2017

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## Executive Summary

*Topic Paper 1: Settlement Boundary Review Methodology* is summarised below.

Chapter/ stage		
1	<b>Introduction</b>	Overview of Wiltshire Housing Site Allocations Plan and settlement boundary review process and methodology paper.
<b>Part 1</b>		
<b>Developing the draft settlement boundary review methodology</b>		
2	<b>Policy review</b>	Reviewing the policy basis for the existing settlement boundaries.
3	<b>Best practice review</b>	Reviewing selected best practice examples of approaches undertaken by other local planning authorities (LPAs) when reviewing settlement boundaries.
4	<b>Feedback from Regulation 18 Consultation</b>	Identification and consideration of the issues raised in feedback from the Regulation 18 Consultation on the scope of the Wiltshire Housing Site Allocations Plan (March to May 2014).
5	<b>Draft settlement boundary review methodology</b>	Developing a draft settlement boundary review methodology and accompanying maps showing the draft settlement boundaries for each settlement
<b>Part 2</b>		
<b>Developing the revised settlement boundary review methodology</b>		
6	<b>Informal consultation with town and parish councils</b>	Informal consultation with town and parish councils on the draft settlement boundaries for each settlement (July to September 2014).
7	<b>Feedback from the informal consultation with town and parish councils</b>	An identification and consideration of the issues raised in feedback from the informal consultation on the draft settlement boundary review methodology and maps.
8	<b>Revised settlement boundary review methodology</b>	Developing a revised settlement boundary review methodology and accompanying maps showing the draft settlement boundaries for each settlement

The Draft Plan has been published, supported by the following topic papers:

Document	Purpose
Community Area Topic Papers	<p>Reports on stages 1 to 4a of the site selection process for each community area, including a summary of relevant outputs from stage 3.</p> <p>Reports on the process and outcome of settlement boundary review for each community area settlement</p>
Topic Paper 1: Settlement Boundary Review Methodology	Explains the process followed to review settlement boundaries and how it was developed
Topic Paper 2: Site Selection Process Methodology	Explains the process followed to select preferred sites and produce plan proposals
Topic Paper 3 : Housing land Supply	Provides the quantitative evidence for housing land requirements
Topic Paper 4 : Developing Plan Proposals F	Reports on how preferred sites affect housing land supply for each Housing Market Area in terms of meeting WCS requirements and the spatial strategy
Topic Paper 5 : Assessment of Viability	Tests the ability of sites to be developed, provide policy compliant levels of affordable housing and necessary infrastructure

## Chapter 1: Introduction

- 1.1. The Wiltshire Housing Site Allocations Plan ('the Plan') does two things:
  - It reviews all settlement boundaries in the Wiltshire Core Strategy (WCS) (except for Chippenham, which has been addressed through the Chippenham Site Allocations Plan)
  - Identifies, where necessary, new allocations for housing at settlements to provide for additional housing to help deliver the WCS housing requirement

### Settlement Boundary Review

- 1.2. The Council did not review the extent of the boundaries to inform the WCS and relied upon the former district local plans. They would instead be reviewed as a part of preparing this Plan.
- 1.3. 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.
- 1.4. This document sets out the methodology for reviewing settlement boundaries and how it was developed.

### The Site Selection Process

- 1.5. The WCS refers to the role of this 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.
- 1.6. A separate paper sets out the methodology for identifying suitable sites for housing development.

### Structure of this paper

- 1.7. Part I explains the development of the draft settlement boundary review methodology, as follows:
  - Chapter 2 reviews the policy basis for the existing settlement boundaries
  - Chapter 3 reviews selected best practice examples of how other local planning authorities have reviewed their settlement boundaries

- Chapter 4 summarises the feedback from the Regulation 18 Consultation on the scope of the Plan
  - Chapter 5 sets out the draft settlement boundary review methodology
- 1.8. Part II explains the development of the revised settlement boundary review methodology following an informal consultation, which was targeted at town and parish councils but open to comments from others, as follows:
- Chapter 6 summarises the process by which the Council undertook an informal consultation with town and parish councils and the feedback received
  - Chapter 7 identifies and considers the issues raised in the feedback from town and parish councils
  - Chapter 8 sets out the revised settlement boundary review methodology

## Part I: Developing the draft settlement boundary review methodology

### Chapter 2: Policy review

- 2.1. This chapter reviews the policy basis for the existing settlement boundaries, which were established by the district local plans and retained in the Wiltshire Core Strategy ('the WCS').

#### National Planning Policy

- 2.2. The National Planning Policy Framework ('the NPPF'), published in March 2012, encourages sustainable patterns of development. For example, the eleventh core principle, in paragraph 17 of the NPPF, states that the planning system should:

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

- 2.3. Also, paragraph 53 of the NPPF states that:

*“local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”*

- 2.4. The Planning Practice Guidance supports the use of settlement boundaries as a policy tool. It affirms that all settlements may play a role in delivering sustainable development in rural areas<sup>1</sup>.

#### District plans

- 2.5. The former district local plans established the settlement boundaries and used a variety of terms to describe them, as shown in *Table 2.1* below.

District Local Plan	Terminology for settlement boundaries
Kennet Local Plan 2011	'Limits of development'
North Wiltshire Local Plan 2011	'Framework of settlement'
West Wiltshire Local Plan 1 <sup>st</sup> Alteration 2004	'Town policy limits' or 'village policy limits'
Salisbury District Local Plan 2011	'Housing policy boundary'

Table 2.1 – Terminology for settlement boundaries in district local plans

<sup>1</sup> PPG Paragraph: 001; Reference ID: 50-001-20160519.



2.6. Table 2.2 below lists the district plan policies that established the policy basis for settlement boundaries. These policies were replaced by Core Policy 1 (Settlement strategy) and Core Policy 2 (Delivery strategy) of the WCS.

District Local Plan	Policy	Description
<b>Kennet Local Plan 2011</b>	<b>Policy NR6</b> – Sustainability and protection of the countryside	Restricts development to within the Limits of Development defined for the towns and villages as identified on the proposals and inset maps, unless: (i) it is of demonstrable benefit to the local rural economy or the social well-being of the local rural community, and/ or (ii) it is permitted by other policies in the Local Plan.
<b>West Wiltshire District Plan 1<sup>st</sup> Alteration (2004)</b>	<b>H1</b> – Further housing development within towns	Restricts housing development outside of the defined town policy limits, as identified on the proposals and inset maps.
	<b>H17</b> – Village policy limits	Permits limited development within the defined village policy limits, which is compatible with the criteria within Policy H17, as identified on the proposals and inset maps.
<b>North Wiltshire Local Plan 2011</b>	<b>H3</b> – Residential development within framework boundaries	Permits residential development within the framework boundaries, as defined on the Proposals Maps, which is compatible with the criteria in Policy H3.
<b>Salisbury District Local Plan 2011</b>	<b>H16</b> – Housing policy boundaries	Permits residential development within the housing policy boundaries, as defined on the Proposals Maps, which is compatible with the criteria in Policy H16.

Table 2.2 – district local plan policies that established the existing settlement boundaries

### Wiltshire Core Strategy

2.7. The WCS uses the term “limits of development” to refer to settlement boundaries. Core Policy 1 presents a settlement strategy for managing growth over the period up to 2026. This settlement 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.

- 2.8. The WCS retains settlement boundaries for principal settlements, market towns, local service centres and large villages, as shown on its accompanying Policies Map.
- 2.9. Core Policy 2 of the WCS has a general presumption in favour of sustainable development within settlement boundaries. Development will not be permitted outside settlement boundaries, other than in circumstances permitted by other policies listed in paragraph 4.25 of the WCS. These 'exception policies' are listed below:
- Additional employment land (Core Policy 34)
  - Military establishments (Core Policy 37)
  - Development related to tourism (Core Policies 39 and 40)
  - Rural exception sites (Core Policy 44)
  - Specialist accommodation provision (Core Policies 46 and 47), and
  - Supporting rural life (Core Policy 48).
- 2.10. Paragraph 4.13 of the WCS allows for the review of the existing settlement boundaries through the Wiltshire Housing Site Allocations Plan. The settlement boundary for Chippenham has been reviewed separately through the Chippenham Site Allocations Plan. Settlement boundaries can also be reviewed by the local community through the neighbourhood planning process.
- 2.11. *Appendix A* to this paper contains a list of settlements that have retained their settlement boundaries, showing those reviewed by this Plan and those reviewed by the Chippenham Site Allocations Plan or a sufficiently advanced neighbourhood planning process.

## Conclusions

- 2.12. The adopted WCS uses settlement boundaries as a policy tool for ensuring the right type of development in the right place. National planning policy encourages sustainable patterns of development and resists inappropriate development in locations where it might cause harm to the local area. These are key underlying principles that will need to be borne in mind when reviewing the existing settlement boundaries. The district local plan policies highlight the different approaches to planning sustainable patterns of development taken by the former district councils in Wiltshire. Understanding these different approaches and the similar principles upon which they are based is important in developing a consistent approach across the whole of Wiltshire.

## Chapter 3: Best practice review

- 3.1. This chapter reviews how other local planning authorities have undertaken a review of their settlement boundaries. The case studies in this review come from Winchester City Council, Purbeck District Council and Kettering Borough Council.

### Case study 1: Winchester City Council

- 3.2. Winchester City Council covers a 250 square mile area of central Hampshire, including the designated heritage city of Winchester itself and neighbouring settlements such as Bishops Waltham, Denmead and The Alresford.
- 3.3. *Table 3.1* sets out how the City Council has reviewed its settlement boundaries.

<b>Case study 1: Winchester City Council<sup>2</sup></b>	
<b>Key features:</b>	<ul style="list-style-type: none"> <li>• Boundary drawn tightly around built form</li> <li>• Follow defined physical features</li> <li>• Need not be continuous; potentially two or more separate elements</li> </ul>
<b>Includes:</b>	<ul style="list-style-type: none"> <li>• Built/ commenced allocations/ planning permissions</li> <li>• Small pieces of land below threshold for allocation or potential infill/ rounding off opportunity</li> <li>• Curtilage contained, visually part of the urban area and separated from the open countryside</li> </ul>
<b>Excludes:</b>	<ul style="list-style-type: none"> <li>• Playing fields or open space at the edge of settlements</li> <li>• Affordable housing permitted on exception sites</li> <li>• Loose knit buildings on the edge of settlements</li> <li>• Outlying or isolated development, including farm buildings</li> <li>• Large gardens or other areas, e.g. paddocks or orchards, whose inclusion would harm the character, structure or form of the area</li> <li>• Important gaps, e.g. where a settlement is fragmented or where open gaps between developed areas should be retained</li> <li>• Camping and caravanning sites not in permanent residential use</li> <li>• Agriculture, forestry, equestrian development, minerals extraction, landfill and public utilities.</li> </ul>
<b>Methodology:</b>	<ul style="list-style-type: none"> <li>• Desk top review, using GIS mapping, aerial photography and information from planning applications</li> <li>• Site visits</li> <li>• Local consultation</li> <li>• Consistent application and explanation of judgements</li> </ul>

Table 3.1 – Winchester City Council’s approach to reviewing its settlement boundary

<sup>2</sup> Winchester City Council. (2014). *Settlement Boundary Review: Winchester District Local Plan Part 2: Development Management and Site Allocations*. Available: <http://www.winchester.gov.uk/assets/files/21793/Settlement-Boundary-Review-2014-FINAL-for-consultation-on-Draft-LPP2-21.10.2014.pdf>. Last accessed 13th October 2016.

## Case study 2: Purbeck District Council

- 3.4. Purbeck District Council covers a 156 square mile area of Dorset, including the Isle of Purbeck, which forms a large proportion of the area, and settlements north and west of the River Frome, including Wareham.
- 3.5. *Table 3.2* sets out how the District Council has reviewed its settlement boundaries.

<b>Case study 1: Purbeck District Council<sup>3</sup></b>	
<b>Key features:</b>	<ul style="list-style-type: none"> <li>• Boundary must be logical, easily identifiable and (normally) follow property boundaries and permanent features</li> <li>• Relates to the urban area and prevent undesirable sprawl</li> <li>• Adhere to settlement hierarchy by directing development towards the most sustainable location</li> <li>• Uses and developments with a clear social or economic relationship with the settlement (including sites within unimplemented planning permission)</li> </ul>
<b>Includes:</b>	<ul style="list-style-type: none"> <li>• Uses and buildings (including sites with unimplemented planning permission) that have a clear social or economic function</li> <li>• Uses and buildings that relate better to the built form of the settlement than the countryside</li> </ul>
<b>Excludes:</b>	<ul style="list-style-type: none"> <li>• Outlying development or small pockets of development that are clearly detached from the settlement</li> <li>• Rural exception sites for affordable housing</li> <li>• Open spaces at the edge of settlements, e.g. sports fields or allotments</li> <li>• Large, open residential gardens or paddocks</li> <li>• Important gaps</li> <li>• Uses that would not normally be found within the settlement boundary, e.g. agriculture or forestry</li> <li>• Camping and caravanning sites unless permanent year round residential occupancy</li> </ul>
<b>Methodology:</b>	<ul style="list-style-type: none"> <li>• Public consultation</li> <li>• Meetings with town and parish councils</li> </ul>

Table 3.2 – Purbeck District Council’s approach to reviewing its settlement boundary

## Case study 3: Kettering Borough Council

- 3.6. Kettering Borough Council covers a 90 square mile area of Northamptonshire, including Kettering, the main town after which it is named and where the Council is based, and other settlements and parishes.

<sup>3</sup> Purbeck District Council. (2015). *Reviewing the Plan for Purbeck’s Future: Purbeck Local Plan Partial Review: Settlement Boundary Review*. Available: <https://www.dorsetforyou.gov.uk/article/409105/Partial-Review-of-Purbeck-Local-Plan-Part-1---Planning-Purbecks-Future>. Last accessed 13 October 2016.

3.7. Table 3.3 sets out how the Borough Council has reviewed its settlement boundaries.

<b>Case study 1: Kettering Borough Council<sup>4</sup></b>	
<b>Key features:</b>	<ul style="list-style-type: none"> <li>• Boundary drawn tightly around built form</li> <li>• Follow defined physical features</li> <li>• Need not be continuous; potentially two or more separate elements</li> </ul>
<b>Includes:</b>	<ul style="list-style-type: none"> <li>• Existing commitments for built developments</li> <li>• Buildings on the edge of villages which relate closely to the economic or social function of the village</li> <li>• Curtilages of properties which are contained and visually separated from the open countryside</li> <li>• New allocations</li> </ul>
<b>Excludes:</b>	<ul style="list-style-type: none"> <li>• Playing fields or open space at the edge of settlements</li> <li>• New allocations for affordable housing</li> <li>• Isolated developments which are physically or visually detached from the settlement</li> <li>• Large gardens and other open areas which are visually open and relate to the open countryside rather than the settlement</li> <li>• Large gardens or other areas whose inclusion or possible development would harm the structure, form and character of the settlement</li> </ul>
<b>Methodology:</b>	<ul style="list-style-type: none"> <li>• Desk top review, using GIS mapping and aerial photography</li> <li>• Site visits</li> <li>• Consultation with parish councils</li> </ul>

Table 3.3 – Kettering Borough Council’s approach to reviewing its settlement boundary

## Conclusions

3.8. It is useful to understand how a range of other local planning authorities have undertaken a review of their settlement boundaries. While there are some differences in their approaches, they generally apply similar principles, such as:

- Boundaries tightly defined around the built form that follow defined and permanent features
- Exclusion of outlying or small pockets of development that are clearly detached from the settlement, and
- Boundaries need not be continuous

3.9. There does need to be, as far as possible, a consistent application of principles with a clear justification and reasoning for changes. However, it appears decisions often depend upon officer judgement such as, for example, on whether buildings relate more to the built form or open countryside.

<sup>4</sup> Kettering Borough Council. (2011). *Site Specific Proposals Local Development Document. Background Paper: Settlement Boundaries*. Available: [https://secure.kettering.gov.uk/downloads/file/4918/settlement\\_boundaries](https://secure.kettering.gov.uk/downloads/file/4918/settlement_boundaries). Last accessed 13 October 2016.

## Chapter 4: Feedback from the Regulation 18 Consultation

- 4.1. This chapter outlines the purpose of the Regulation 18 Consultation on the scope of the Wiltshire Housing Site Allocations Plan ('the Plan') and summarises the feedback.

### The Regulation 18 Consultation

- 4.2. Between 24<sup>th</sup> March and 5<sup>th</sup> May 2014, the Council undertook a formal public consultation on the scope of the Plan. The consultation signalled that the Plan would:

- Review settlement boundaries across Wiltshire, and
- Consider housing site proposals

- 4.3. The consultation also included a 'call for sites' request, which asked for potential housing sites to be submitted to the Council by completing a Strategic Housing Land Availability Assessment (SHLAA) form.

### Summary of consultation feedback

- 4.4. While the majority of responses related to potential housing sites, comments on the proposed settlement boundary focussed on the approach, the settlement strategy and the relationship with the neighbourhood planning process.

#### *Issue 1: The approach to the settlement boundary review*

- 4.5. It was suggested that there was an inconsistency between references in the WCS to the approach reviewing settlement boundaries. For instance, paragraph 4.13 states that:

*'these settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations Plan and Chippenham Site Allocations Plan, as set out in the Council's Local Development Scheme, in order to ensure they are up to date and can **adequately** (emphasis added) reflect changes which have happened since they were first established.'*

- 4.6. However, paragraph 4.15 states that:

*'these settlement boundaries will also be reviewed as part of the Wiltshire Housing Site Allocations Plan as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and **properly** (emphasis added) reflect building that has happened since they were first established.'*

- 4.7. Nevertheless, the Council considers both sentences to be similar, with the words 'adequately' and 'properly' used interchangeably.

*Issue 2: the settlement strategy*

- 4.8. It was also suggested that how settlements were classified in the district plans should be taken into account when reviewing the settlement boundary. It was highlighted that previous district plan policies had identified distinct settlements, which the WCS has then grouped together and classified them as large villages.
- 4.9. However, the Council considers that the settlement boundary review should reflect how settlements have been classified in Core Policy 1 of the WCS and can show separate boundaries for each settlement forming a group.

*Issue 3: the relationship with the neighbourhood planning process*

- 4.10. There were queries about the relationship between the settlement boundary review and the neighbourhood planning process. Would the Plan take into account proposals in Neighbourhood Plans? Would Neighbourhood Plans need to have reached an advanced stage?
- 4.11. The Council agrees that this issue requires clarification. It would be important to find out from town and parish councils if they were looking to review their settlement boundaries through a neighbourhood plan.

**Conclusions**

- 4.12. Few specific issues were identified through the Regulation 18 Consultation in relation to the proposed settlement boundary review. However, the relationship with the neighbourhood planning process is something that would need to be explored further. This could be done as part of the informal consultation with town and parish councils on draft settlement boundaries. It would help in better understanding the relationship between the two processes.
- 4.13. Further information on the consultation and feedback can be found in the Consultation Statement<sup>5</sup> accompanying the Plan.

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<sup>5</sup> Wiltshire Council (June 2017), Wiltshire Housing Sites Allocations Plan Consultation Statement. Annex A: Report on the Regulation 18 Consultation.

## Chapter 5: The draft settlement boundary review methodology

- 5.1. This chapter sets out the draft settlement boundary review methodology. It was developed from a consideration of feedback from the Regulation 18 Consultation and the policy and best practice reviews.

### The draft settlement boundary review methodology

- 5.2. *Table 5.1* below sets out the draft settlement boundary review methodology.

<b>The draft settlement boundary review methodology</b>	
<b>Where practical, the draft settlement boundaries follow clearly defined physical features, such as, walls, fences, hedgerows, roads and water courses in order to define the built area of the settlement.</b>	
<b>Areas which have been included are:</b>	<ul style="list-style-type: none"> <li>• Both built and extant planning permissions for residential and employment uses for areas which are physically/ functionally related to the settlement</li> <li>• Existing and extant planning permissions for community facilities, such as religious buildings, schools and community halls which are considered to be physically/ functionally related to the settlement</li> <li>• Site allocations identified in the development plan for both residential, community and employment uses which are physically/ functionally related to the settlement.</li> </ul>
<b>Areas which have been excluded are:</b>	<ul style="list-style-type: none"> <li>• Curtilages of properties which have the capacity to extend the built form of the settlement. This includes large residential gardens</li> <li>• Recreational or amenity space at the edge of settlements which primarily relate to the countryside (in form or nature)</li> <li>• Isolated development which is physically or visually detached from the settlement (including farm buildings or agricultural buildings, renewable energy installations).</li> </ul>

**Table 5.1 – the draft settlement boundary review methodology**

- 5.3. The Council followed this draft methodology to draw new settlement boundaries. A desktop review used geographical information system (GIS) data sets, including aerial imagery and ordnance survey maps. It sought to define a new boundary that would include the central area for each principal settlement, market town, local service centre and large village. This extended to schools, existing employment areas and defined curtilages of existing buildings within the settlement, where appropriate to the criteria in the draft methodology.



- 5.4. The Council presented the new boundaries for each settlement on OS maps, which also included the existing boundary to clearly show the areas of change. The maps were made available through the Council's online consultation portal as part of an informal consultation (between July and September 2014) targeted at town and parish councils but open to comments from others<sup>6</sup>.

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<sup>6</sup> The maps showing the draft settlement boundaries (July 2014) are available to download from the Council's online consultation portal at [http://consult.wiltshire.gov.uk/portal/spatial\\_planning/sites\\_dpd/settlement\\_boundary\\_review\\_intial\\_and\\_informal\\_consultation](http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/settlement_boundary_review_intial_and_informal_consultation).

## Part II: Developing the revised settlement boundary review methodology

### Chapter 6: The informal consultation with town and parish councils

- 6.1. This chapter outlines the process of consultation with town and parish councils about the draft settlement boundary review and summarises the feedback.

#### The informal consultation with town and parish councils

- 6.2. In July 2014, the Council published the draft settlement boundary review methodology and individual maps for each settlement with a settlement boundary. The maps were made available through the Council's online consultation portal<sup>7</sup>. An informal consultation on these proposals took place for an eight week period between 28 July and 22 September 2014. During the consultation period, the Council held briefing sessions for town and parish councils in Calne, Salisbury and Trowbridge.
- 6.3. The consultation targeted town and parish councils because they are representatives of their respective communities and may have detailed knowledge of their local area. However, for transparency, the Council made the methodology and maps publically available on its website and consultation portal from the start of the consultation.
- 6.4. The Council received comments from individuals and organisations, in addition to those from town and parish councils. Many arrived after the deadline. As this was an informal consultation, the Council accepted these comments to better inform the settlement boundary review.

#### Summary of consultation feedback

- 6.5. In summary, those who responded:
- Highlighted a lack of consistency in applying the criteria
  - Agreed that the settlement boundary should follow clearly defined physical features but wanted it to be more clearly shown whether they are inside or outside the line
  - Argued that the term 'functionally' should be removed because it is too simplistic/ imprecise (for example, a garage or household amenity site located several miles away from the settlement could be considered 'functionally' related if people use the facilities)

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<sup>7</sup> The maps showing the draft settlement boundaries (July 2014) are available to download from the Council's online consultation portal at [http://consult.wiltshire.gov.uk/portal/spatial\\_planning/sites\\_dpd/settlement\\_boundary\\_review\\_intial\\_and\\_informal\\_consultation](http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/settlement_boundary_review_intial_and_informal_consultation).

- Wanted to protect employment land from residential development by including only residential development within the settlement boundary or, failing that, having a separate boundary for employment development
- Disagreed that the settlement boundary should include allocations, development proposals and unimplemented planning permissions (a view supported by the majority of comments on this issue)
- Disagreed that the settlement boundary should exclude large gardens and particularly objected to the line being drawn through the middle of the curtilage of properties.
- Argued that there was less opportunity to meet National Planning Policy Framework and Wiltshire Core Strategy housing targets on land within the settlement boundary because the proposed changes removed land with only minor additions. This resulted in tightly constrained settlements, excluded large gardens, protected amenity land and excluded Strategic Housing Land Availability Assessment sites.

## Conclusions

- 6.6. The targeted consultation with town and parish councils brought up several important issues, summarised above and discussed in more detail in the next chapter.
- 6.7. The Consultation Statement that accompanies the Plan contains further details about the consultation and the feedback, including comments in full and officer responses<sup>8</sup>.

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<sup>8</sup> Wiltshire Council (June 2017). Wiltshire Housing Sites Allocations Plan Consultation Statement. Annex B: Report on the Informal Consultation with Town and Parish Councils on Draft Proposals for Amending Settlement Boundaries.

## Chapter 7: Feedback from the informal consultation with town and parish councils

- 7.1. This chapter identifies and gives further consideration to the main issues that have come out of feedback from the consultation. It then sets out how each of these issues will be addressed in developing a revised settlement boundary review methodology. Finally, the chapter summarises the changes to the method and provides a comparison with the draft settlement boundary review methodology.

### Overview

- 7.2. Those who responded to the consultation commented on the relationship between the settlement boundary and:
- Physical features on the ground
  - Different types of development
  - Planning permissions
  - Sites allocated for development in the local plan
  - The curtilage of properties, including large gardens, and
  - Recreational or amenity space at the edge of settlements
- 7.3. Many also commented on the relationship between the settlement boundary review and the neighbourhood planning process.
- 7.4. Each of these issues will be considered separately in more detail below.

### Physical features on the ground

- 7.5. The draft settlement boundary review methodology stated that:

*“Where practical, the draft settlement boundaries follow clearly defined physical features, such as, walls, fences, hedgerows, roads and water courses in order to define the built area of the settlement.”*

- 7.6. Those who responded agreed that the settlement boundary should follow clearly defined physical features. However, they wanted it to be more clearly shown whether they are inside or outside the line. Other minor points raised by consultation feedback included replacing the phrase ‘where practical’ with ‘where practicable’, which is grammatically correct in this context, and ‘built area’ with ‘built form’.

### Conclusion

- 7.7. There was no disagreement with the general approach in this section. The points raised here essentially relate to issues of clarification and consistency. Therefore, the revised settlement boundary review methodology will make it clear that the settlement boundary will follow but not include clearly defined physical features. This will be reflected in revisions to the maps. Further changes to wording and sentence structure will be made in respect of the minor grammatical points raised in order to aid clarity and understanding.

### **Different types of development**

- 7.8. The draft settlement boundary review methodology includes:

- Residential, employment and community facility uses, such as religious buildings, schools and community halls, which are physically/functionally related to the settlement

- 7.9. It excludes:

- Isolated development that is physically or visually detached from the settlement (including farm buildings or agricultural buildings, renewable energy installations)

- 7.10. Some of those who responded disagreed with the inclusion of employment land within the settlement boundary. They argued that employment land needs to be protected from residential development. Other minor points raised by consultation feedback related to some of the terms used in this part of the methodology. The term 'functionally related' was considered too imprecise. For example, a garage and a household amenity site might be located several miles away from the settlement. However, they could be said to be functionally related to a settlement if people used these facilities. Also, the term 'visually detached' was considered to be used interchangeable with 'physically' and 'functionally' throughout the methodology.

### *Conclusion*

- 7.11. There was less agreement on the general approach in this section, specifically in relation to the inclusion of employment land within the settlement boundary. This perhaps reflects the evolution of the draft settlement boundary review methodology from four different approaches in the former district local plans. Not all of the former district local plans included employment land within their settlement boundaries. There is also a desire to protect employment land from residential conversion. However, Core Policy 35 of the Wiltshire Core Strategy ('the WCS') protects employment land from residential development. Yet, the protection under Core Policy 35 only extends to principal settlements, market towns and local service centres. Employment land in large villages is not protected by Core Policy 35. Neither is employment land protected in small

villages but small villages do not have settlement boundaries. There is then a need to address the omission of large villages from Core Policy 35 and concerns raised during consultation feedback. This does not mean that employment land should be excluded from settlement boundaries in all types of settlement.

Therefore, the revised settlement boundary review methodology will exclude employment development at the edge of large villages. Further wording changes, such as removing the term ‘functionally related’ and consistent use of ‘physically’ in place of ‘visually’ or ‘functionally’, would aid clarity.

### **Planning permission**

7.12. The draft settlement boundary review methodology includes:

- Extant planning permissions

7.13. Many of those who responded disagreed with the inclusion of unimplemented planning permissions within the settlement boundary. They argued that many planning permissions never get built out and that the final built form may differ substantially from the original permission.

### *Conclusion*

7.14. The role of a settlement boundary is to define the built form of the settlement. Unimplemented planning permissions, by definition, have yet to be built and, therefore, do not form part of the built environment. Until they are built, there is still a degree of uncertainty over the exact layout of the urban form. Indeed, they may not be built out at all. However, for those planning permissions where development has commenced, there is a much greater certainty over the final built form of the development. Therefore, the revised settlement boundary review methodology will include within the settlement boundary built or commenced planning permissions but exclude all unimplemented planning permissions. Nevertheless, it is recognised that settlement boundaries represent a snapshot in time. Unimplemented planning permissions subsequently built out can be included within a future review.

### **Sites allocated for development in the local plan**

7.15. The draft settlement boundary review methodology includes:

- Site allocations identified in the development plan

7.16. Many of those who responded disagreed with the inclusion of site allocations within the settlement boundary. Their reasoning being similar to that behind their opposition to the inclusion of unimplemented planning permissions.

### *Conclusion*

7.17. Again, the purpose of the settlement boundary is to define the built form of a settlement. There is likely to be uncertainty over how much space within the red line on a site plan drawing is taken up by the built form. Therefore, the revised settlement boundary review methodology will exclude site allocations identified in the development plan.

### **The curtilage of properties, including large gardens**

7.18. The draft settlement boundary review methodology excludes:

- The curtilages of properties that have the capacity to extend the built form of the development. This includes large gardens.

7.19. Those who responded strongly disagreed with the exclusion of large gardens from within settlement boundaries. There was also opposition to the settlement boundary being drawn arbitrarily through the middle of gardens, effectively bisecting the curtilage of the property. In some cases, the settlement boundary had been drawn touching or even through the actual property.

### *Conclusion*

7.20. There needs to be a balance between tightly constraining growth and substantially extending the built form of settlements. Some parts of the curtilage of properties relate more closely to the built environment, such as gardens. Others relate more closely to the open countryside, such as fields or paddocks. However, the inclusion of some gardens within the settlement boundary could substantially extend the built form of the settlement. Whether this could happen depends upon the size of the garden and the location, i.e. its scale in relation to its immediate surroundings. It would be impractical to specify a size limitation as this may not be appropriate for all settlements. There is a need for a subtle and flexible approach. One that takes into account differences between settlements and consultation feedback and balances the need to control development with allowing for the growth of settlements. Therefore, the revised settlement boundary review methodology will include the curtilage of a property that relates more closely to the built environment, e.g. a garden), or has limited capacity to extend the built form of the settlement in terms of scale and location. However, it will exclude the curtilage of a property that relates more closely to the open countryside, e.g. a field or a paddock, or has the capacity to substantially extend the built form of the settlement in terms of scale and location.

### **Recreational or amenity space at the edge of settlements**

7.21. The draft settlement boundary review methodology excludes:

- Recreational or amenity space at the edge of settlements that primarily relate to the countryside (in form or nature)

- 7.22. Consultation feedback opposed the exclusion of small parcels of open land on the edge of settlements. Many of these had previously been included within the settlement boundary. The draft methodology drew concerns about unnecessarily tightening settlement boundaries and restricting reasonable development opportunities on unused or infill land. Some argued that removing land within the existing boundary and tightly constraining settlements meant less opportunity to meet National Planning Policy Framework and WCS housing targets.

### *Conclusion*

- 7.23. Again, there need to be a balance between tightly constraining growth and substantially extending the built form of settlements. Some recreational or amenity spaces at the edge of settlements relate more closely to the built environment. Others relate more closely to the open countryside. The inclusion within the boundary of some recreational or amenity spaces at the edge of settlements could substantially extend the built form of the settlement. Whether this could happen depends upon the size of the recreational or amenity space and its relationship to its immediate surroundings. It would be impractical to specify a size limitation as this may not be appropriate for all settlements. There is a need for a subtle and more flexible approach. One that takes into account differences between settlements and consultation feedback and balances the need to control development with allowing for the growth of settlements. Therefore, the revised settlement boundary review methodology will include recreational or amenity spaces that relate more closely to the built environment. However, it will exclude those which relate more closely to the open countryside. Nevertheless, it is recognised that these decisions will often be a matter of officer judgement that depends on the individual circumstances.

### **Relationship with neighbourhood planning**

- 7.24. The informal consultation asked town and parish councils whether they have, or were intending to review settlement boundaries as part of their neighbourhood plan. The information sought included that on any work they had undertaken and the timetable for their neighbourhood plan.
- 7.25. Consultation responses from town and parish councils requested clarification on the relationship between neighbourhood plans and the Plan. Some commented on the need for settlement boundaries in neighbourhood plans to take precedence. They also suggested the Council should confirm that the settlement boundaries in the Plan could be subject to further change arising from subsequent neighbourhood plans.



## Conclusion

- 7.26. Paragraphs 4.13 and 4.15 of the WCS support the review of settlement boundaries through the Plan or through neighbourhood plans<sup>9</sup>. Therefore, where a neighbourhood plan has been considered to have reviewed the settlement boundary and is at a sufficiently advanced stage, then the Council considers it unnecessary to duplicate this work by reviewing the relevant settlement boundary in the Plan. However, updates may be appropriate to reflect planning permissions that have been implemented since the boundary was reviewed. The position up to 1 April 2016 has been taken into account in the preparation of the Plan to reflect the latest monitoring data.
- 7.27. Neighbourhood plans will be considered to have reviewed their settlement boundaries where this 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, this Plan does not carry out a second review of the boundaries<sup>10</sup>. The community area topic papers will highlight those settlements where the settlement boundary is considered to have been reviewed by a sufficiently advanced neighbourhood plan.
- 7.28. However, for settlements where the neighbourhood plan is not considered to have reviewed their boundary, or where there is no neighbourhood plan or one at an early stage, then the settlement boundary will be reviewed through the Plan.
- 7.29. 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.

## Summary

- 7.30. *Table 9.1* summarises the changes and compares them with the draft methodology. These have resulted from identifying and considering the issues espoused in feedback from the informal consultation with town and parish councils and further officer review.

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<sup>9</sup> The settlement boundary for Chippenham has been reviewed separately through the Chippenham Site Allocations Plan.

<sup>10</sup> Formal submission takes place under Regulation 16 of the Neighbourhood Planning Regulations 2011 (As amended).

Criteria	Draft methodology	Revised methodology
<b>Physical features on the ground</b>	<i>Where practical, the draft settlement boundaries follow clearly defined physical features, such as, walls, fences, hedgerows, roads and water courses in order to define the built area of the settlement.</i>	<b><i>The settlement boundaries define the built form of the settlement by, where practicable, following but not including clearly defined physical features, such as walls, fences, hedgerows, roads and water courses.</i></b>
<b>Different types of development</b>	<u>Includes:</u> <i>Residential, employment and community facility uses, such as religious buildings, schools and community halls, which are physically/ functionally related to the settlement</i>	<u>Includes:</u> <b><i>Residential and community facilities development, such as religious buildings, schools and community halls, that is physically related to the settlement</i></b>  <b><i>Employment development in principal settlements, market towns and local service centres<sup>11</sup> that is physically related to the settlement</i></b>
	<u>Excludes:</u> <i>Isolated development that is physically or visually detached from the settlement (including farm buildings or agricultural buildings, renewable energy installations)</i>	<u>Excludes:</u> <b><i>Employment development, farm buildings and farmyards, at the edge of large villages<sup>1</sup></i></b>  <b><i>Isolated development that is physically detached from the settlement (including farm buildings or agricultural buildings and renewable energy installations)</i></b>
<b>Planning permission</b>	<u>Includes:</u> <i>Built and extant planning permissions</i>	<u>Includes:</u> <b><i>Built and commenced planning permissions</i></b>
		<u>Excludes:</u> <b><i>All types of unimplemented planning permissions</i></b>

<sup>11</sup> As defined in Core Policy 1 Settlement Strategy in the adopted Wiltshire Core Strategy (January 2015).

<b>Criteria</b>	<b>Draft methodology</b>	<b>Revised methodology</b>
<b>Sites allocated for development in the local plan</b>	<u>Includes:</u> <i>Site allocations identified in the development plan</i>	
		<u>Excludes:</u> <b>Site allocations</b>
<b>The curtilage of properties, including large gardens</b>	<u>Includes:</u>	<u>Includes:</u> <b><i>The curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in terms of scale and location</i></b>
	<u>Excludes:</u> <i>The curtilages of properties that have the capacity to extend the built form of the development. This includes large gardens.</i>	<u>Excludes:</u> <b><i>The curtilage of a property that relates more closely to the open countryside (e.g. a field or paddock) or has the capacity to substantially extend the built form of the settlement in terms of scale and location</i></b>
<b>Recreational or amenity space at the edge of settlements</b>	<u>Includes:</u>	<u>Includes:</u> <b><i>Recreational or amenity space at the edge of a settlement that relates more closely to the built environment</i></b>
	<u>Excludes:</u> <i>Recreational or amenity space at the edge of settlements that primarily relate to the countryside (in form or nature)</i>	<u>Excludes:</u> <b><i>Recreational or amenity space at the edge of the settlement that relates more closely to the open countryside</i></b>

Table 7.1 – Comparison between draft and revised settlement boundary methodologies

7.31. The Plan will not review the settlement boundary of settlements where it is already considered to have been reviewed by a sufficiently advanced neighbourhood plan. Should a subsequent neighbourhood planning process review a settlement boundary then it can decide whether to keep the boundary in the Plan, or develop and consult upon its own, bespoke boundary.



## Chapter 8: The revised settlement boundary review methodology

8.1. This chapter sets out the revised settlement boundary review methodology, which resulted from consultation feedback and further officer review.

### The revised settlement boundary review methodology

8.2. *Table 8.1* sets out the revised settlement boundary review methodology.

<b>The revised settlement boundary review methodology</b>	
<b>The settlement boundaries define the built form of the settlement by, where practicable, following but not including clearly defined physical features, such as walls, fences, hedgerows, roads and water courses.</b>	
<b>Areas which have been included are:</b>	<ul style="list-style-type: none"> <li>• Built and commenced residential and community facilities development such as religious buildings schools and community halls, that is physically related to the settlement</li> <li>• Built and commenced employment development in principal settlements, market towns and local service centres<sup>12</sup> that is physically related to the settlement</li> <li>• The curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in terms of scale and location</li> <li>• Recreational or amenity space at the edge of a settlement that relates more closely to the built environment</li> </ul>
<b>Areas which have been excluded are:</b>	<ul style="list-style-type: none"> <li>• Employment development, farm buildings and farmyards, at the edge of large villages</li> <li>• Isolated development that is physically detached from the settlement (including farm buildings or agricultural buildings and renewable energy installations)</li> <li>• The extended curtilage of a property that relates more closely to the open countryside (e.g. a field or paddock) or has the capacity to substantially extend the built form of the settlement in terms of scale and location</li> <li>• Recreational or amenity space at the edge of the settlement that relates more closely to the open countryside</li> <li>• All types of unimplemented planning permission</li> <li>• Site allocations</li> </ul>

**Table 8.1 – the revised settlement boundary review methodology**

<sup>12</sup> As defined in Core Policy 1 Settlement Strategy in the adopted Wiltshire Core Strategy (January 2015)

### **Undertaking the review of settlement boundaries**

- 8.3. The Council undertook a desktop review of each boundary using geographical information system (GIS) data sets, including aerial imagery and ordnance survey maps. The desktop review produced a revised boundary that followed the methodology above but also considered consultation responses received in regards to specific locations.
- 8.4. It was recognised that a desktop review alone may not necessarily take into account the detail and most recent changes on the ground. Therefore, following the desktop assessment, planning officers with relevant local knowledge were consulted on the maps produced for each settlement. They have more detailed, up to date local knowledge of the area they cover. It was considered that they would be able to provide further critical assessment of the proposed boundary. Feedback from planning officers was then taken into account and any final revisions to the boundary maps were made.

### **The proposed changes to settlement boundaries**

- 8.5. Each community area topic paper supporting the Wiltshire Housing Site Allocations Plan contains OS maps showing settlement boundaries where they are proposed for review. The maps show both the existing settlement boundary, as set out in the Wiltshire Core Strategy Policies Map or where relevant neighbourhood plan, and the revised settlement boundary for comparison. A schedule and justification of the main changes from the existing settlement boundary are also provided alongside the maps.

## Appendix A – Amended Settlement Boundaries

### East Wiltshire Housing Market Area (HMA): Amended Settlement Boundaries

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
<b>Devizes</b>		
	Devizes*	Devizes*
	Bromham	Potterne
	Market Lavington	Urchfont
	Rowde	
	West Lavington and Littleton Panell	
	Worton	
<b>Marlborough</b>		
	Aldbourn	
	Baydon	
	Broad Hinton	
	Marlborough	
	Ramsbury	
<b>Tidworth and Ludgershall</b>		
	Collingbourne Ducis	
	Ludgershall	
	Netheravon	
	Tidworth	
<b>Pewsey</b>		
	Burbage	Pewsey
	Great Bedwyn	
	Shalbourne	
	Upavon	

\* 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.

### North and West Wiltshire Housing Market Area (HMA): Amended Settlement Boundaries

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
<b>Bradford on Avon</b>		
	Westwood	Bradford on Avon
	Winsley	Holt

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
<b>Calne</b>		
	Calne	
	Studley and Derry Hill	
<b>Chippenham<sup>13</sup></b>		
	Christian Malford	
	Hullavington	
	Kington St Michael	
	Sutton Benger	
	Yatton Keynell	
<b>Corsham</b>		
	Box	
	Colerne	
	Corsham	
	Rudloe	
<b>Malmesbury</b>		
	Malmesbury	Great Somerford
	Ashton Keynes	
	Crudwell	
	Oaksey	
	Sherston	
<b>Melksham</b>		
	Atworth	
	Melksham and Bowerhill	
	Seend	
	Semington	
	Shaw and Whitley	
	Steeple Ashton	
<b>Royal Wootton Bassett and Cricklade</b>		
	Cricklade	
	Lyneham	
	Purton	
	Royal Wootton Bassett	
<b>Trowbridge</b>		
	Hilperton	
	North Bradley	
	Southwick	
	Trowbridge	
<b>Warminster</b>		
	Chapmanslade	
	Codford	

<sup>13</sup> The settlement boundary for the town of Chippenham has been reviewed by the Chippenham Site Allocations Plan.



Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
	Corsley	
	Heytesbury	
	Sutton Veny	
	Warminster	
<b>Westbury</b>		
	Bratton	
	Dilton Marsh	
	Westbury	

### South Wiltshire Housing Market Area (HMA): Amended Settlement Boundaries

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
<b>Amesbury, Bulford and Durrington</b>		
	Amesbury	Porton (Idmiston NP)
	Bulford	
	Durrington	
	Great Wishford	
	Shrewton	
	The Winterbournes	
	Tilshead	
<b>Mere</b>		
	Mere	
<b>Salisbury</b>		
	Salisbury	
<b>Southern Wiltshire</b>		
	Alderbury	
	Combe Bissett	
	Downton	
	Morgan Vale and Woodfalls	
	Pitton	
	Whiteparish	
	Winterslow	
<b>Tisbury</b>		
	Fovant	
	Hindon	
	Ludwell	
	Tisbury	

<b>Wilton</b>		
	Broad Chalke	
	Dinton	
	Wilton	

For settlement boundaries reviewed by the Wiltshire Housing Site Allocations Plan, the Community Area Topic Papers include maps showing previous and amended boundaries for settlements in each HMA. Each map is accompanied by a table of changes from the current adopted boundary.