

AGENDA

Meeting: **Cabinet**
Place: **Online**
Date: **Tuesday 29 June 2021**
Time: **10.00 am**

[Online](#)

Please direct any enquiries on this Agenda to Stuart Figini, of Democratic Services, County Hall, Trowbridge, direct line 01225 718221 or email stuart.figini@wiltshire.gov.uk

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During the Covid - 19 emergency situation the Committee is operating under revised procedures including in relation to public participation, as attached to this agenda.

The meeting will be available to view live via a Teams Live Event Link as shown above. [A guide of how to access the meeting online is available here.](#)

All public reports referred to on this agenda are available on the Council's website at www.wiltshire.gov.uk

Membership:

| | |
|------------------------|--|
| Cllr Richard Clewer | Leader of the Council and Cabinet Member for MCI, Economic Development, Heritage, Arts, Tourism and Health & Wellbeing |
| Cllr Laura Mayes | Deputy Leader and Cabinet Member for Children's Services, Education and Skills |
| Cllr Jane Davies | Cabinet Member for Adult Social Care, SEND, Transition and Inclusion |
| Cllr Phil Alford | Cabinet Member for Housing, Strategic Assets and Asset Transfer |
| Cllr Ian Blair-Pilling | Cabinet Member for Leisure, Libraries, Governance, Facilities Management and Operational Assets |

| | |
|-------------------------|---|
| Cllr Nick Botterill | Cabinet Member for Development Management, Strategic Planning and Climate Change |
| Cllr Pauline Church | Cabinet Member for Finance & Procurement, Commissioning, IT, Digital and Commercialisation |
| Cllr Simon Jacobs | Cabinet Member for Public Health, Public Protection, Licensing, Staffing, Communities and Area Boards |
| Cllr Dr Mark McClelland | Cabinet Member for Transport, Waste, Street Scene and Flooding |

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Part I

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

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

1 **Apologies**

2 **Minutes of the previous meeting** (*Pages 5 - 14*)

To confirm and sign the minutes of the Cabinet meeting held on 1 June 2021, previously circulated.

3 **Declarations of Interest**

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

4 **Leader's announcements**


5 **Public participation and Questions from Councillors**

The Council welcomes contributions from members of the public. This meeting is open to the public, who may ask a question or make a statement. Questions may also be asked by members of the Council. Written notice of questions or statements should be given to Stuart Figini of Democratic Services stuart.figini@wiltshire.gov.uk 01225 718221 by 12.00 noon on Wednesday 23 June 2021. Anyone wishing to ask a question or make a statement should contact the officer named above.

6 **Wiltshire Local Plan Review Update** (*Pages 15 - 82*)

 Report of the Chief Executive

7 **Housing Related Support** (*Pages 83 - 136*)

 Report of the Chief Executive

8 **Disposals Programme Update** (*Pages 137 - 146*)

Report of the Chief Executive

9 **Re procurement of electricity and gas contract** (*Pages 147 - 156*)

 Report of the Chief Executive

10 **Urgent Items**

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

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

11 Exclusion of the Press and Public

This is to give further notice in accordance with paragraph 5 (4) and 5 (5) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 of the intention to take the following item in private.


To consider passing the following resolution:

To agree that in accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting for the business specified in Item Numbers 12 and 13 because it is likely that if members of the public were present there would be disclosure to them of exempt information as defined in paragraph 3 of Part I of Schedule 12A to the Act and the public interest in withholding the information outweighs the public interest in disclosing the information to the public.

Reason for taking item in private:

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

12 Re Procurement of Electricity and Gas Contract (Pages 157 - 158)

 Report of the Chief Executive

Reason for taking item in private:

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

13 Porton Science Park - Further fit out

 Report of the Chief Executive to follow.

Reason for taking item in private:

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

Cabinet

MINUTES OF THE CABINET MEETING HELD ON 1 JUNE 2021 AT ONLINE.

Present:

Cllr Richard Clewer (Chairman), Cllr Laura Mayes (Vice-Chairman),
Cllr Pauline Church, Cllr Jane Davies, Cllr Ian Blair-Pilling, Cllr Nick Botterill,
Cllr Simon Jacobs and Cllr Dr Mark McClelland

Also Present:

Cllr Caroline Corbin, Cllr Jon Hubbard, Cllr Tony Jackson, Cllr Mel Jacob, Cllr Carole King, Cllr Gordon King, Cllr Ashley O'Neill, Cllr Sam Pearce-Kearney, Cllr Pip Ridout, Cllr Ian Thorn, Cllr Jo Trigg, Cllr Suzanne Wickham, Cllr Christopher Williams, Cllr Graham Wright, Cllr Helen Belcher, Cllr Clare Cape, Cllr Charles McGrath, Cllr Nabil Najjar, Cllr Paul Sample JP, Cllr Mike Sankey, Cllr Martin Smith and Cllr Bridget Wayman

1 Apologies

Apologies were received from Cllr Phil Alford.

2 Minutes of the previous meeting

The minutes of the meeting held on 16 March 2021 were presented.

Resolved:

To approve as a correct record and sign the minutes of the meeting held on 16 March 2021.

3 Declarations of Interest

There were no declarations of interest.

4 Leader's announcements

There were no Chairman's announcements.

5 Public participation and Questions from Councillors

Questions were received from the following members of public:

- Ken McCall – Ashton Park Urban Expansion, Trowbridge / A350 Yarnbrook-West Ashton Relief Road

- Melanie Boyle – Travel Solutions for Chippenham
- Margaret Willmot – Climate Emergency and Transport Policy
- Cllr Gordon King – Deliverability of Strategic Site H14 at Westbury and Railway Bridge

Cllr Clewer explained that the above questions had received written responses which were published on the Council's website prior to the meeting in the agenda supplement 2, which can be accessed [here](#).

A supplementary question was received from Cllr King in relation to a future application for Government funding for the delivery of the new bridge. Cllr Botterill confirmed that he would discuss the matter further with Cllr King following the meeting.

In addition to the above questions, a number of further questions were received from Councillors as follows:

- Cllr Ian Thorn about (i) Wiltshire Climate Alliance inclusion at Area Board meetings; (ii) The transfer of the Climate Change portfolio from the Leader of the Council to the Cabinet Member for Development Management, Strategic Planning and Climate Change; (iii) Furlong Close. In response, Cllr Clewer explained that (i) Area Boards were all encouraged to decide how best to address climate change for their area; (ii) with the increase in responsibilities as Leader of the Council, Cllr Clewer felt it was appropriate to transfer the Climate Change portfolio to another Cabinet Member so that it receives the time it deserves, that he was now unable to achieve in his new role as Leader of the Council; and (iii) There were many complex issues associated with Furlong Close and residents would be supported and their views would be taken on board.
- Cllr Bridget Wayman asked for an update in relation to questions she had asked as the former Cabinet Member for Highways, Transport and Waste, to Defra about the Bath Clean Air Zone. In response Cllr Clewer assured Cllr Wayman that conversations were taking place with Defra and an update would be provided once available.
- Cllr Sam Pearce-Kearney asked about S106 monies and their use for future highway schemes. In response, Cllr Botterill, Cabinet Member for Development Management, Strategic Planning and Climate Change explained that expired agreements with developers would be revisited and Parish Council's would be asked to investigate how best to spend S106 monies that were not specifically aligned to certain projects.

6 **COVID-19 Final Update**

Cllr Richard Clewer, Leader of the Council and Cabinet member for MCI, Economic Development, Heritage, Arts, Tourism and Health & Wellbeing introduced the report which provided a summary of the key activities to mitigate the impact of the coronavirus in Wiltshire since the last update to Cabinet in March 2021.

The Chief Executive explained that since the last report the roadmap for exiting lockdown has been followed with further relaxations coming into place. Support for businesses, vulnerable groups, care homes and educational settings continued.

The Cabinet noted that this would be the final update report as a separate report on this subject and work to address the legacy of the pandemic will be embedded into the council's new business plan.

The Chief Executive reported that the final stage of relaxations set out in the roadmap is set for midsummer's day (21 June) and conditional on the data continuing to move in the right direction. Government will make its decision on this the week beforehand (14 June). Wiltshire Council is working closely with its partners in English Heritage and Wiltshire Police to ensure that summer solstice events such as that at Stonehenge can go ahead if it is permitted.

The Chief Executive reported that the recent elections in Wiltshire were one of the largest elections in the country and a significant logistical challenge; however, the Council ensured these were held in a COVID-19 secure way. It was noted that residents were encouraged to, where possible, vote by post and this messaging would continue for the forthcoming Police and Crime Commissioner election to be held on 19 August. He thanked all the staff involved for the significant effort undertaken to deliver one of the largest set of elections in the country. Developments since the last report were summarised in the report and in appendix 1 under the following areas:

- Test and Trace and isolate
- Community (asymptomatic) testing
- Mass vaccinations
- Outbreak management
- Public Health support to Schools & Educational settings
- Community spaces and engagement
- Wellbeing Hub
- Care Homes
- Education and Skills
- Economy
- Excess Deaths
- Health & Care
- Safe Spaces
- Homelessness
- Organisational Recovery

Cllr Laura Mayes thanked officers for their outstanding contributions, continued hard work and resilience during this difficult and testing time. She urged officers to take a break in order to look after their health and mental wellbeing.

Cllr Graham Wright, Chair of the Overview and Scrutiny Management Committee, reported that the Committee met on 25 May 2021 to consider the Cabinet report. Robust Scrutiny was undertaken, and the Committee were

satisfied with the updates and responses to questions received and supported the proposals in the report. Select Committees would consider details about their areas of responsibility during the forthcoming round of meetings.

Cllr Ian Thorn, Leader of the Liberal Democrat Group, echoed the comments of others paying tribute to officers across all services, and taking time out was vital for all officers. In particular he paid tribute to officers involved in the elections and the remarkable efforts in delivering successful elections.

In response to questions from Cllr Thorn, about (i) the help being offered to businesses; (ii) the development of community groups and how they could continue to operate into the future; (iii) Teacher assessments; Cabinet members and officers explained that (i) resources were being allocated to a total of £4m over 4 years to help businesses with the recovery phase of the pandemic; (ii) Members recognised the importance of the local groups continuing, and the Wellbeing Hub would continue going forward; and (iii) the Council recognises the impact on teachers and how hard they have worked during the pandemic, especially with the assessment of pupils of exam age. It was noted that information would be provided about the processes being followed for assessments, so that students and parents would have confidence in the system being employed.

In response to questions, comments and issues raised by other Councillors, officers explained the following:

- The need for the adult population to be double vaccinated. Community testing using rapid lateral flow devices helps to identify those people who are infectious but asymptomatic and unaware they may be spreading the disease. This helps trace their contacts, support them to isolate and prevent transmission to others.
- The rates of successful contact tracing for COVID cases across Wiltshire remained high, with 98% of Wiltshire cases being successfully reached by either NHS Test and Trace or the Wiltshire Local Tracing Partnership, delivered by the Public Health Team.
- Engagement with residents and service users is essential along with the provision of mental health services tailored to the individual.

Cllr Clewer thanked all officers for their efforts in combating the pandemic along with the many officers associated with the recent elections in May 2021.

Resolved:

- **To continue to encourage all residents to download the NHS Test and Trace app on their phone.**
- **To continue to encourage all residents to answer a call received from 0300 456 0100 as it may be the local contact tracing team within the Council**

- **To continue to encourage all residents to follow national guidance**
- **To continue to encourage residents to attend for vaccination when invited and to continue to follow national guidance after vaccination**
- **To thank residents that voted in the recent elections and encourage use of a postal vote for the upcoming PCC election on 19 August**
- **To note the work underway as we approach the final stages of the government roadmap**

Reason for decision:

Wiltshire Council continues to work closely with partners to deliver in a rapidly changing environment.

7 Provisional Outturn 2020/21

Cllr Pauline Church, Cabinet Member for Finance and Procurement, Commissioning, IT, Digital and Commercialisation introduced the report which (i) advised Members of the provisional outturn position for financial year 2020/21 (31 March 2021) for revenue with the necessary approvals as appropriate; and (ii) provided an update on the financial impact on the Council of responding to the COVID-19 pandemic and details on Government support.

The Cabinet received questions from Susan McGill in relation to this report. Cllr Clewer explained that the questions had received responses, which were available to read in the agenda supplement 2 on the Council's website [here](#).

Cllr Church reported that the £13.571m set aside in two new earmarked reserves, one for Latent Demand and a Collection Fund Volatility reserve as well as £4.165m in the Budget Equalisation Reserve approved as part of the quarter two (Q2) budget monitoring report, would mitigate risk and known pressures that will arise in future years and balance the budget for 2021/22 financial year. It was noted that the approvals have effectively reset the budgets for services by transferring all the variances, the overspends and underspends, and putting the net position into the Latent Demand reserve.

The report set out the variances in the financial performance from Q3 to the Q4 position. The overall financial variances for the financial year were detailed in Appendix A.

Cabinet noted that after receiving £32m of emergency funding from the Government to support the Council in managing the response to COVID-19, an estimated £6.4m from Government to offset income losses as a result of lockdown interventions, additional furlough grant claimed and the revision of the timing of latent demand, the Q4 outturn position has again improved. The provisional Q4 position shows an additional underspend of £16.246m following

the requests approved as part of the Q2 and Q3 budget monitoring reports, which will see the Council underspend by £33.982m for the financial year 2020/21.

Cllr Church explained that a significant proportion of the one-off funding will be required to meet a range of costs and pressures, some of which maybe recurring, in the following financial year. Therefore, the report set out proposals to set aside these funds to ensure the financial sustainability and resilience of the Council to continue to deliver services over the medium term. Concern was expressed specifically about the Dedicated Schools Grant and in particular overspends on the High Needs Block, which was driven from parents and schools for support for vulnerable children and SEN & disability.

Cllr Pip Ridout, Chair of the Financial Planning Task Group, reported that the next Task Group meeting was set for 25 June 2021 and she would be able to report further on the Task Group comments on this at a future meeting of the Cabinet. Cllr Ridout reminded the Cabinet that the provisional outturn represented a moment in time, and that the Council were still in the midst of a pandemic and its impacts on the Council budgets.

Cllr Ian Thorn, Leader of the Liberal Democrat Group asked for information about the Council's financial position if the pandemic had not taken place and there were no exceptional circumstances to be dealt with. The Council's Corporate Director of Resources & Deputy Chief Executive explained that it was difficult to understand the true picture without Government help and officers were undertaking a base budget review to understand the metrics going forward, and latent demand for future years.

Following questions from Cllr Helen Belcher about alternative sources of income and financial support for the Council, Cllr Church explained that the Council received support from the Government through various grants, for instance, the Dedicated Schools Grant, many services provided by the Council were funded by the Government, and there were some commercialisation opportunities. The Council would also consider other forms of income like Business Rates and Council Tax.

In response to a question from Cllr Simon Jacobs about the £32m funding received from the Government to tackle the pandemic, Cllr Church assured the Cabinet that in relation to this funding, the Council had a statutory responsibility to spend the funding on tackling COVID and not for any other purpose. The Government would also undertake an audit of how the Council spent the funding.

Resolved:

1. Cabinet noted:

- a) **the Section 151 officer's summary of the impact of COVID-19 on the Council's 2020/21 budget;**

b) the provisional revenue budget outturn position for the financial year 2020/21;

c) the contributions to and from earmarked reserves as planned;

2. Cabinet approved:

d) the transfer of an additional £2.937m to the Latent Demand reserve;

e) the transfer in total of £3.912m to new earmarked reserves as detailed in the report and Appendices B & C, as follows:

i. National Assessment & Accreditation System (NAAS) £0.163m;

ii. School Improvement, Monitoring & Brokerage Grant £0.220m;

iii. Early Years Professional development programme £0.062m;

iv. Neighbourhood Planning £0.164m;

v. Local Plan £0.323m;

vi. Highways & Environment £3.007m;

vii. Car Parking Machines £0.034m;

f) the transfer of £2.675m to the Capital Financing reserve;

g) the transfer of the balance of the £6.661m provisional underspend as follows:

i. £1.4m to be transferred to the General Fund reserve;

ii. £2m to be set aside for the estimated pay award for 2021/22;

iii. £3.261m to the Budget Equalisation reserve;

h) £0.470m of Capital Approval for Salisbury Car Park & Maltings is brought forward from 2022/23 into 2021/22 and allocated to the River Park Bridge works.

Reason for decision:

To inform effective decision making and ensure sound financial management as part of the Councils overall control environment.

To inform Cabinet on the provisional revenue outturn position for the Council for the financial year 2020/21, including delivery of approved savings.

To improve the Councils financial resilience by increasing the balance on the General Fund reserve now and setting aside funds in earmarked reserves to prudently assist in managing the Councils future pressures and budget gap.

8 A350 Melksham Bypass Consultation Report

Cllr Mark McClelland, Cabinet Member for Transport, Waste, Street Scene and Flooding introduced the report reviewing the response to the public consultation

on the options for the A350 Melksham Bypass scheme and the further assessment work recently undertaken, and to approve further consultation on a short list of options.

The Cabinet received questions from Janet Giles, Andrew Nicolson and Alan Baines in relation to this report. In addition, Andrew Nicolson and Alan Baines read out statements at the meeting. A copy of the statements are available to read in an updated agenda supplement 2 on the Council's website [here](#).

Supplementary questions were received from Andrew Nicolson about the urgency claims for the new bypass and potential for new employment opportunities. In responding to the supplementary questions, Cllr McClelland and Cllr Richard Clewer explained that (i) the Council's Transport Strategy encourages modal shift, however the Council needed to be realistic, especially in relation to the transport options for rural communities. Cllr McClelland also highlighted the Government's priority to improve links to the south coast and M4, with the A350 being key to this priority; and (ii) in referring to the national transport strategy, evidence indicates that investment in transport helps the economy of the country.

Questions were also submitted by Charmian Spickernell in relation to this report, although they were received after the deadline for questions. Cllr Clewer explained that all questions had received a written response which were published prior to the meeting in Agenda Supplement 2 on the Council's website [here](#).

Cllr McClelland reported that the A350 Melksham Bypass is a Large Local Major scheme which has been awarded development funding by the Department of Transport (DfT) to take it to Outline Business Case stage. It would be a major improvement to the important A350 route which provided vital transport links between the M4, the towns of western Wiltshire and the south coast. A range of options for the scheme were the subject of a public consultation earlier in the year and these had helped to develop the scheme further, in order to prepare a short list of options for further consultation.

Cabinet noted that a sifting process has been undertaken to identify the most suitable options for further consultation. In addition to the most suitable options, the report detailed the reasons why certain routes were discounted.

Cllr Ian Thorn, Leader of the Liberal Democrat Group highlighted the need for positive mitigation measures to be employed and for an effective consultation to take place which was reflective of the wishes of the local community.

Cllr Jon Hubbard expressed surprise that the report only highlighted one option for further consultation, giving the impression that a decision had already been made and that future contributions may not be taken into account. He felt that issues of congestion will remain, although pollution levels will be eased due to new technologies being introduced for vehicles. He asked if the proposal to explore the possibility of improving walking and cycling facilities could be

included in any agreed schemes. Cllr McClelland confirmed that this was acceptable and should be included as part of any future scheme.

Cllr Clare Cape raised issues about the potential for carbon reduction on the proposed schemes. In response, Cllr McClelland explained that further development including detailed analysis of any scheme was necessary and carbon reduction issues would be considered at that stage.

Following a question from Cllr Gordon King, Cllr McClelland confirmed that a reduction in journey times was the primary criteria of any scheme that was implemented.

Resolved:

- i. The response to the initial public consultations and the views of the town and local parish councils are noted and taken into account in the scheme development.**
- ii. The following options should not be included in the short list of options for further consultation for the reasons set out in the report:**
 - Non-road options (Options 1 to 6)**
 - Improvement of the existing road (Options 7a, 7b and 7c)**
 - Western routes (Options 8a, 8b, 9a, 9b and 9c)**
 - Short eastern routes (Options 10a and 10b)**
 - Longest eastern route (Option 10d) and its variants**
- iii. Further public consultation should be undertaken on a short list of options comprising the long eastern route (Option 10c) and alternative alignments at the northern end which may be feasible.**
- iv. The possibility of improving walking and cycling facilities in conjunction with the scheme or separately should continue to be explored.**
- v. The views of the public, town and parish councils, Area Board and other organisations should be obtained on the short list of options in order to inform the future development of the scheme.**

Reason for decision:

The A350 Melksham Bypass is a Large Local Major scheme which has been awarded development funding by the DfT to take it to OBC stage. It will be a

major improvement to the important A350 route which provides vital transport links between the M4, the towns of western Wiltshire and the south coast.

As part of the development of the scheme various options were consulted on. In order to inform the further development of the scheme, it is proposed to adopt a short list of feasible options for further consideration and consultation. The preferred route will need to meet the transport objectives and the DfT requirements in order to be awarded funding.

The proposed consultations with the public, town and parish councils, the Area Board and other organisations, will inform the development of the scheme, and assist in preparing an OBC to submit to the DfT.

9 **Urgent Items**

There were no urgent items.

(Duration of meeting: 10.00 am - 1.10 pm)

The Officer who has produced these minutes is Stuart Figini of Democratic Services, direct line 01225 718221, e-mail stuart.figini@wiltshire.gov.uk

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

Wiltshire Council

Cabinet

29 June 2021

Subject: Wiltshire Local Plan Review Update

Cabinet Member: Councillor Nick Botterill - Cabinet Member for Development Management, Strategic Planning and Climate Change

Key Decision: Key

Executive Summary

Following the approval of Cabinet on 1 December 2020, consultation was undertaken on the Wiltshire Local Plan Review between 13 January 2021 and 9 March 2021. This report provides an initial summary of the main issues that were raised through the consultation and the next steps.

The consultation was not on a draft Local Plan but on key components to inform one, including proposals for the scale and distribution of housing and employment growth across Wiltshire. It also sought views on the role of the Local Plan in helping the County adapt to and mitigate for climate change.

The consultation can be considered a success and encouraged a significant response. Overall, in excess of 3,500 representations were made from 2,682 people and organisations.

Collectively they represent a wide range of views and reinforce the need to further develop evidence on housing and employment growth, as well as the potential for renewable and off grid energy in Wiltshire and zero carbon development.

Development needs, such as those for affordable homes and land for business must be planned for positively. The consultation clearly shows that difficult choices will need to be made. Wiltshire as a whole remains a highly attractive location for the development industry and it continues to press for wider opportunities. In general terms, however, local communities are cautious about further growth. Concerns revolve around the environmental issues, ability for infrastructure to cope (particularly health, education and transportation) and the view that while significant housing has taken place this has not been matched with new jobs.

Concerns vary from settlement to settlement like the evidence underpinning each one's potential to grow. Understanding issues and concerns are an important part of the work going forward. The results of this consultation are an invaluable and central part of plan preparation, which will need to be considered fully alongside the development of new evidence to inform policies within the draft Plan. Whilst recognising the clear concerns of the local

community the Local Plan must be prepared on the basis of objective assessments of needs for housing and employment and a comprehensive appraisal of the evidence.

It is good practice to update the evidence base for a Local Plan throughout the plan's preparation. The consultation has led to a clear need for the Council to undertake further technical evidence on a range of issues. Updated evidence on growth forecasts are now needed to accurately inform the content of the draft Local Plan. In particular, the Council needs to look again at the range of housing needs to ensure it is evidence based and an appropriate deliverable housing requirement can be set for Wiltshire. A review of the evidence may lead to changes at housing market area level and the allocations within them. An integral part of the work moving forward will also involve considering what infrastructure will need to be planned for alongside housing growth. Further evidence is also needed to inform our future direction on renewable energy, off-grid energy and zero carbon development.

Proposal(s)

That Cabinet:

- (i) Notes this initial summary of main issues arising through the consultation and agrees the Cabinet Member for Development Management, Strategic Planning and Climate Change signs off the completed consultation report prior to publication on the Council's website;**
- (ii) Agrees that progress continues to be made to develop the Wiltshire Local Plan Review;**
- (iii) Agrees that further work is undertaken in response to the consultation on key parts of the evidence base, including:**
 - Testing the upper and lower levels and spatial distribution of the range of housing need for the plan period;**
 - A review of the employment evidence underpinning need for new employment land; and**
 - Wiltshire wide assessment of potential for renewable energy, zero carbon development and off grid energy networks at main settlements.**

Reason for Proposal(s)

Cabinet at its meeting of 1 December 2020 resolved to receive a report after the consultation summarising the main issues raised.

**Terence Herbert
Chief Executive**

Wiltshire Council

Cabinet

29 June 2021

Subject: Wiltshire Local Plan Review Update

Cabinet Member: Councillor Nick Botterill - Cabinet Member for Development Management, Strategic Planning and Climate Change

Key Decision: Key

Purpose of Report

1. The purpose of this report to:
 - (i) Provide an update on the main issues that were raised through the recent consultation on the Wiltshire Local Plan Review, as approved by Cabinet on 1 December 2020; and
 - (ii) Outline the next steps in preparing the draft Wiltshire Local Plan Review.

Relevance to the Council's Business Plan

2. The Business Plan 2017-2027 'Forward Thinking' seeks to create: strong communities in Wiltshire. The Local Plan aligns with all three of its priorities: Growing the Economy, Strong Communities and Protecting the Vulnerable. Delivering development where it is needed forms one of the goals of the Business Plan.

Background

3. Cabinet at its meeting on [1 December 2020](#) approved consultation documents to inform the preparation of the draft Wiltshire Local Plan Review, and delegated authority to the Director for Economic Development and Planning in consultation with the Cabinet member for Spatial Planning, Development Management and Property to make arrangements for the consultation to take place.
4. Consultation commenced on 13th January 2021 and closed on 9th March 2021. Due to the COVID-19 pandemic in line with the Council's adopted [Statement of Community Involvement](#) and Temporary Arrangements, consultation material was not displayed at Council offices and libraries, instead people were encouraged to view this via the Council's website. 17 webinars were held to enable people to find out more about the consultation and encourage people to respond - in total around 1,320 people attended these. Arrangements were also put in place to allow people who did not have access to the internet to have hard copies sent to them by post.

5. Now the consultation has been completed all representations are being considered in preparing the draft Plan and further work undertaken in response to these to develop evidence to inform its policies. Once the draft Plan is prepared this will be considered by both Cabinet and Council before the Plan is published and a final stage of consultation is undertaken - known as the Regulation 19 Town and Country Planning (Local Planning) (England) Regulations 2012 stage.
6. Once the Regulation 19 consultation stage is complete, the next stage will be for the Council to submit the draft Plan to the Secretary of State for independent examination by a Government appointed Inspector.
7. Through the examination process, the Council will need to demonstrate that the Plan has been prepared in accordance with legal and procedural requirements and that it is "sound". The tests of soundness are set out in national planning policy. To be sound, a Plan must be:
 - (i) **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - (ii) **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - (iii) **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - (iv) **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.
8. In considering the consultation response and working towards the publication of a draft Plan, it will be important as we move forward to think ahead to the examination process and build the plan with the legislative requirements and tests of soundness in mind.

Main Considerations for the Council

9. A considerable response was received to the consultation. Overall, in excess of 3,500 representations were made from 2,682 people and organisations who responded. There was a significant amount of views put forward, often taking different positions. An initial summary of these has been provided in **Appendix 1** and focuses on the main issues that are emerging from the consultation documents. Some of the key findings are outlined below together with the implications for the preparation of the draft Plan and development of evidence.

10. This is only an initial summary. There were many complex and detailed comments. Also, due to the weight of response and the different ways in which comments could be made - including web-based downloadable forms, email and letter - processing and analysing comments is taking time. A full consultation report is being prepared, as is normal practice, and will be published on the Council's website when it is available alongside the consultation responses submitted.
11. In general, the need to plan sustainably for Wiltshire is an underlying theme raised through the consultation response, with the importance of addressing and adapting to climate change, the health and well-being of communities and well-designed places being important components. There are clear concerns from the local community about growth and the need for infrastructure to keep pace with development; particularly health, education and transportation. Concerns have been expressed also about: the loss of valued landscapes around towns and coalescence with outlying villages; and not enough emphasis on brownfield land reuse. There were some calls for new settlements as part of an alternative strategy, but no specific proposals put forward other than a cross boundary proposal promoted by a developer (the majority of which relates to Cotswold District) for a new community of 2,000 homes at Kemble Airfield.

Housing growth

12. Significant comments in number and content were made about the overall scale of housing growth, with a range of views expressed.
13. The consultation sought to test the upper end of a range of housing need of 40,840 to 45,630 homes for Wiltshire, identified in the Swindon and Wiltshire Local Housing Need Assessment (LHNA) prepared by Opinion Research Services in April 2019, for the period 2016 to 2036.
14. The lower figure reflected the Government's standard methodology for new homes (the minimum number that a Local Plan must plan for) and the higher figure reflected local evidence that suggested Wiltshire will need more homes to balance forecast job growth and the working age population, to avoid people travelling into the county to work. There is a difference of around 5,000 homes between the lower and upper end of the range.
15. There was a clear divergence of views, with many considering that the impacts on the environment (e.g. landscape, biodiversity and carbon footprint) and/or infrastructure were too great for the higher or lower number. Conversely, the development industry was generally either supportive of the higher number or considered it should be raised further to boost housing and deliver more affordable homes. It was also suggested that the base date of the plan be reset (from 2016) and the plan period extended (from 2036) to allow for 15 years from adoption.
16. There is support from neighbouring authorities that Wiltshire is seeking to meet its housing needs within the county. In addition, there is currently no evidence-based requests from neighbourhood authorities to meet their unmet need in Wiltshire.

17. A main criticism about the higher figure was that the job forecasts that informed the figure were out of date and that the more recent events of COVID-19 and Brexit would suppress job growth, and thus reduce homes arising from that method.
18. In the light of the consultation response and national policy, it is considered that further work needs to be undertaken to refresh the Council's evidence on housing need. This includes updating the minimum standard methodology figure to consider new affordability data; updating the employment projections to inform the jobs / workers balance and understand the economic implications of COVID-19 and Brexit.

Employment growth

19. Concerns were raised about the employment evidence underpinning the need for additional employment land and its reliance on dated job growth forecasts that do not reflect the impact of COVID-19 and Brexit. In addition, challenges were made about how much and where new employment land was proposed, including the promotion of land at both Junctions 16 and 17 of the M4 motorway for strategic employment use and concerns raised about the need to deliver more jobs to allow people to live and work locally.
20. A review of the evidence to reflect a post Brexit and pandemic world is needed to ensure there is a sound basis on which to plan for the employment needs of different sectors in the right locations.
21. General concerns were also expressed about the need to plan for the regeneration of town centres, recognising their importance for the communities they serve and local economy. Further work will be undertaken to develop a policy framework to support and facilitate positive change within centres. Some felt that redevelopment opportunities should be taken to maximise residential development in town centres to avoid the use of greenfield sites. However, such an approach would need to be balanced against the desire to retain town centres as hubs for their local communities.

Distribution of growth

22. The LHNA firstly defined Wiltshire's Housing Market Areas (4 in total, see **Appendix 2**) and then distributed the growth at both ends of the range to these. As Wiltshire is so large, distributing growth by Housing Market Area (HMA) ensures that homes are delivered where they are needed.
23. In simple terms, using the upper end of the range for each HMA a distribution of growth was proposed for the main settlements (Principal Settlements of Chippenham, Salisbury and Trowbridge; and market towns) and the rural parts of each HMA. In the rural parts of the HMAs, housing numbers were proposed for the Local Service Centres and Large Villages as the most sustainable locations for growth after the market towns. Some felt that the level of growth to the rural areas was too high, while others thought it was not enough.

24. At the main settlements, generally there were mixed views expressed about the proposed scales of growth for each place, with reasons given for these. With at one end some local community representatives not wishing to see any growth at all to the other end where the development industry wishes to see higher levels of growth. All the views expressed will need to be looked at to ensure a fair and proper consideration of the issues they raise.

Planning for the main settlements

25. It is the detailed considerations at the main settlement level and the evidence underpinning their potential to grow and justification for this that in turn helps inform what the housing requirement for the Plan should be. Difficult choices will need to be made as in general terms the local community is cautious about further growth, albeit there is some recognition of the need to provide homes for future generations and the other benefits growth can bring. The main concerns revolve around the environmental issues, ability for infrastructure to cope and the view that while significant housing has taken place this has not been matched with new jobs.

26. At the principal settlements, preferred sites were proposed showing how the proposed growth could be accommodated. At the market towns, no preferred sites were proposed but views sought on the suitability of possible sites at settlements.

27. Some of the key points raised through the consultation about the main settlements within each housing market area are set out below.

Chippenham Housing Market Area

Calne:

- Growth was seen as closely linked to the provision of infrastructure, including the possibility of a bypass, and protecting employment provision.
- The neighbourhood plan should take a lead in identifying where development takes place, prioritising brownfield opportunities.
- Natural England raised concerns about outward expansion towards the Area of Outstanding Natural Beauty.

Chippenham:

- There was a significant amount of objection from the local community to the scale of growth on a variety of grounds, the most common being: environmental harm, traffic congestion, lack of justification and undermining tackling the climate emergency.
- There were considerable objections to new road proposals. Some suggested that the existing road infrastructure is sufficient and some suggested road improvements (e.g. Bridge Centre roundabout and further improvements to the A350 could be made instead).

- Support for Chippenham as a focus for growth came from developers and landowners, although questions were raised about whether the homes could be delivered in the timescale. There were no objections from statutory environmental agencies, pending further details
- Land was promoted as further development for employment at M4 Junction 17. Residential redevelopment was proposed for parts of Langley Park and Emery Gate.
- Possible opportunities from development were seen as local economic benefits (greater self-containment), restoration of the Wilts and Berks Canal and an extensive riverside park

Corsham:

- Town Council say local health services would face difficulties supporting any higher scales of growth than those suggested.
- Natural England object to two sites to the West of the town - sites 5 (The Circus) and 6 (Land to the North of 16 Bradford Road) - because of their likely adverse effects on ecological 'bat' designations in the area.
- Developers and landowners suggest alternative sites that include outlying locations, such as RAF Rudloe Manor

Devizes:

- Mixed response to scale of growth with developers being supportive or promoting more, while community generally thought 'about right' or too high with calls for brownfield only.
- Development should not worsen traffic problems in the town.
- Concern from Natural England and the North Wessex Downs AONB over sites that affect the designation; wider concern from the local community that not enough emphasis was placed upon the town's landscape setting, green space and heritage.
- Brownfield sites for new homes were promoted at Wadworth Brewery, Devizes School, and by NHS property on sites that are surplus.
- Many objected to Site 6, Greenacres Nursery due to its importance as community greenspace and for biodiversity.

Malmesbury:

- There were marked differences of view over the scale of growth between developers, suggesting higher scales reflecting the role of the town, and the local community suggesting lower ones in recognition of environmental constraints and pressures upon local infrastructure.
- Natural England raised concerns over sites that could affect the AONB whilst Sport England would object if the cricket club was proposed for redevelopment.

- Local community views asked for sports, leisure and the needs of the young to be given greater recognition.

Melksham:

- The local community does not accept that the town should accommodate a greater focus for growth than other settlements. The scale of growth would lead to a coalescence with Bowerhill and Berryfield and could not be supported by local infrastructure.
- Wessex Water suggest the proposed scale of growth requires further investigation to see what water and sewerage infrastructure may be needed.
- Developers suggest that several large sites would be necessary to deliver the proposed scale of growth.
- There was generally a mixed response to the possibility of an A350 bypass - some believed it is urgently needed, others that it will adversely impact the natural environment and was no longer a priority because of changing work patterns.

Salisbury Housing Market Area

Amesbury:

- There was broad support for the place shaping priorities, including support for more employment provision and for a stronger town centre.
- Separation of Bulford and Durrington from Amesbury is supported by parish councils, but some challenge by developers.
- The MoD object to site 3, which is constrained by the aerodrome and technical safeguarding zones associated with Boscombe Down.
- A significant new site is promoted to south west of Amesbury (land North of London Road and land east of A345) as a development of around 1,200 new homes.
- Land at High Post employment area (remote from Amesbury) is promoted by additional employment development.

Salisbury:

- The role of brownfield land was a main topic. The local community considered there should be greater focus on brownfield opportunities for new homes to avoid greenfield use. Developers considered that this source should not be relied upon.
- Churchfields continues to be supported as a redevelopment opportunity by the City Council and many in the local community.
- The local community were concerned about the consequences of growth; lagging infrastructure delivery, impact on highways, air-quality, landscape setting to the city and outlying settlements, and biodiversity.

- Developers argued that the scale of growth proposed for Salisbury should be higher, particularly given demand and a large local need for more affordable homes, more easily realised through greenfield development.
- There were concerns from Natural England and Historic England about the choice of preferred sites given the proximity and importance of constraints nearby them.

Tidworth and Ludgershall:

- The proposed scale of growth was considered broadly acceptable by the local community. Developers felt that a higher scale would reflect the towns' relationship to Andover.
- There was support for the delivery of Castledown Business Park ahead of additional employment allocations, to include provision for start-ups/small businesses. Town Council support also for limited retail and leisure uses.
- Several sites (MoD) were described as unavailable at this time and only site 4 (Land at Empress Way) is actively promoted.

Swindon Housing Market Area (within Wiltshire)

Marlborough:

- There was concern about the basis for the scale of growth proposed. This revolved around the balance of jobs and homes, what the extent of need for affordable homes was and how much the need for homes is from the local community itself.
- There was concern about the scale of growth and its possible impacts upon the Area of Outstanding Natural Beauty. Natural England object to site 2, land adjacent to Salisbury Road allocation.
- The local community felt the town needed a range of new infrastructure to support the scale of growth.

Royal Wootton Bassett:

- The local community suggested a lower scale of growth, one reason being the need for local services and jobs to balance past numbers of new homes.
- Town Council is only supportive of proposed level of growth if it can be assured that the infrastructure improvements to support it can be delivered.
- To developers, the scale of growth recognised the town's relationship with Swindon and higher growth could help to deliver infrastructure improvements.

- Sport England object to sites 1 and 3 (north of town) due to potential impacts upon use of nearby playing fields
- There was widespread objection to site 4, land at Whitehill Lane.

Trowbridge Housing Market Area

Bradford on Avon:

- The local community objected to the scale of growth because of significant environmental and infrastructure constraints. A lower scale should be focused on brownfield sites.
- There was a significant amount of objection to each site, but particularly Site 3 (Golf course) on traffic, landscape, ecological and amenity grounds.
- More emphasis should be placed on town centre recovery and job creation.

Trowbridge:

- Proposed allocation fails to accord with the Wiltshire Core Strategy as it fails to recognise Hilperton's status as a Large Village. Therefore, the proposals would not serve to meet the needs of the town but simply lead to the coalescence of the village with the town.
- Environmental impact of developing to the north-east of Hilperton would lead to increased risk of flooding, loss of habitats, increased pollution and a denudation of the historic character of Hilperton.
- Proposed location for growth at the town would lead to severe traffic congestion and an exacerbation of wider traffic impacts.
- Considering the environmental constraints at the town associated with the Western Wiltshire Green Belt, critical bat habitats and species, more emphasis should be placed on regenerating brownfield sites within the town before more greenfield land is built upon.
- Some suggested that development to meet the needs of the town should be spread around the town; redistributed to other Market Towns and/or the Large Villages of Southwick and North Bradley.

Warminster:

- Scale of growth was broadly acceptable, but possibly overly reliant on the West Warminster Urban Extension. Small sites for local builders might help avert possible housing supply issues.
- Development should be focused on the regeneration of brownfield sites.
- There was a mixed response in relation to the sites, but any new development should provide appropriate infrastructure.

Westbury:

- General support from the Town Council and developers for the proposed scale of growth, but tackling A350 congestion, providing more affordable housing homes, and a focus on town centre renewal were key priorities.
- The local community called for a lower scale of growth and improvements to existing infrastructure (e.g. schools, health facilities).
- Site 11, land at Redland Lane is an important playing field and losing it to development without compensation would be inappropriate.
- General consensus that there is no need for additional employment land.

28. It is also worth noting that there are landowners on the edge of settlements located in adjoining authorities (Shaftesbury and Swindon) who are promoting land that crosses into or is within Wiltshire. Equally there are landowners promoting the expansion of Ludgershall into the adjoining Test Valley Borough Council area. In the main this is for housing growth, but as set out in paragraph 19 above land at Junction 16 (Swindon) is also being promoted for employment use. Currently, as set out in paragraph 16 above, there are no requirements from adjoining authorities to meet their housing needs in Wiltshire.

29. Further work is being undertaken to consider an appropriate response to the consultation comments made and what revisions should be made to the spatial strategy. This will include identifying where changes may be justified to the scales of growth at the main settlements, as well as the preferred sites, and further detailed site assessment work to identify allocations for the draft Local Plan.

30. A critical part of the evidence base for the spatial strategy and distribution of growth will be further transport studies, which in simple terms will consider:

- (i) How self-containment of settlements could be improved to influence trip generation and reduce the need to travel, how a shift towards active travel and sustainable modes could be achieved; and to what extent this could reduce the reliance on the car and new road infrastructure. Scenarios will need to be looked at about how new development can support carbon neutrality in Wiltshire.
- (ii) What transportation infrastructure would be needed to support the spatial strategy (taking into account any revisions) and to form particular requirements for allocated sites.

Rural settlements

31. There were some calls to reclassify the status of a number of villages in the settlement strategy, which generally appear to be motivated on the basis that a lower classification (e.g. move from Large to Small Village status) would

mean less growth or a higher classification (e.g. move from Large Village to Local Service Centre) would mean more growth. These will all need to be looked at on an evidential basis to see if their role, function and the services/facilities they contain has changed substantially since they were first designated to justify any change.

32. The methodology to determine, and levels of, housing proposed for Large Villages and Local Service Centres were challenged. There were concerns that the method was too complex, while others thought it should add in more factors. Local communities were cautious about further growth, whereas those with a development interest sought an increase.
33. It was also suggested that Local Service Centres should be considered as strategic settlements with allocations made through the Local Plan, and less reliance placed on neighbourhood planning to deliver housing in the rural areas. Similarly, it was suggested that some Large Villages could also be considered as having a different strategic role borne out of their proximity to larger settlements.

Climate change

34. The consultation on the Addressing Climate Change and Biodiversity Net Gain paper generated significant interest. Comments generally fell into two groups. The first, those with environmental interests including general public and some parish/town councils, who felt the Local Plan should be more aspirational in terms of achieving zero carbon targets, particularly in terms of new development. In addition, this group of comments also considered that more emphasis should be placed on biodiversity enhancement, including placing open spaces at the heart of all new development.
35. The second group of comments included a significant lobby from the development industry who stressed a rapid transition to net zero carbon development would be unduly costly. Developers questioned the Council's evidence on the true costs of building to zero carbon standards. However, little evidence on such matters was submitted to illuminate their assertions.
36. In the light of the consultation response, the legal duty¹ to ensure the policies of the Local Plan address climate change, national policy and the Council's climate emergency declaration, it is considered that further work (alongside the transport evidence referred to above) needs to be undertaken to refresh the Council's evidence. This will include undertaking:
 - A Wiltshire-wide assessment of renewable energy potential focusing on wind, solar, biomass and other technologies.
 - An objective assessment of the cost of delivering zero carbon housing and commercial development (to feed into an overall Local Plan viability assessment).
 - An assessment of the potential for local energy networks at main settlements and the opportunity to identify potential off-grid energy sources.

¹ <https://www.legislation.gov.uk/ukpga/2004/5/section/19>

Overview and Scrutiny Engagement

37. Overview and Scrutiny has not been formally engaged in the proposals in this report. However, the Executive response to the recommendations of the Global Warming and Climate Emergency Scrutiny Task Group was considered by Environment Select Committee on 3 March 2021; and will be taken into consideration in the preparation of the draft Plan.

Safeguarding Implications

38. There are no safeguarding implications arising directly from the proposal.

Public Health Implications

39. Planning for sustainable development to meet the employment, housing and infrastructure needs of communities helps foster their wellbeing. Well planned development and good place shaping supports health and wellbeing of local communities, for example, through the provision of green infrastructure and infrastructure to encourage active travel (walking and cycling). Maintaining up to date policy for Wiltshire supports the timely delivery of social infrastructure to improve resilience of local communities

Procurement Implications

40. Procurement of further evidence to inform the Local Plan Review will be undertaken in line with corporate procedures.

Equalities Impact of the Proposal

41. The Council is subject to a public sector equality duty introduced by the Equality Act 2010. Consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement and associated Temporary Arrangements that are in place in the light of the COVID-19 situation. The consultation took an inclusive approach ensuring that everyone can be involved.

42. An Equality Impact Assessment will be carried out alongside the preparation of the draft Plan and will accompany the draft Plan when it is submitted to the Secretary of State for examination.

Environmental and Climate Change Considerations

43. In developing the Plan regard will continue to be given to the Wiltshire Council climate emergency declaration (26 February 2019), as part of policy and proposal formulation. To be legally compliant, the Plan must include policies designed to ensure that the development and use of land in the local planning

authority area contributes to the mitigation of, and adaptation to, climate change².

44. As summarised above, concerns about climate change and a desire for climate friendly planning policies have been articulated by consultees. Paragraph 36 sets out the work that will be carried out to develop the evidence relating to transport, renewable energy, zero carbon development policies and energy networks.
45. Sustainability Appraisal and Habitats Regulations Assessment also form an integral part of the plan making process. These help to ensure negative environmental impacts are avoided, and policies and proposals deliver development in a sustainable manner.

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

46. The principal risk is that progress is not made with developing an up to date Local Plan for Wiltshire, which will support plan led growth in the County and provide a framework for neighbourhood plans to be prepared. The Government expects all local planning authorities to have an up to date plan in place by 2023. If this is not done, the Council will be at risk of unplanned development on an ad hoc basis determined by the Secretary of State through planning appeals.

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

47. See above.

Financial Implications

48. Further evidence will be required to support development of the draft Plan (e.g. viability assessment, transport studies). The draft Plan will need to be progressed through subsequent stages of preparation including a further stage of consultation and examination before it can be adopted. While as far as possible the draft Plan will be developed using technical expertise of officers within the Council there is the need to procure support from external sources to ensure timely delivery.
49. Provision has been made for this in the 2021/22 Spatial Planning revenue budget and a recommendation has also been put forward to Cabinet as part of the Provisional Outturn 2020/21 report to create a Local Plan earmarked reserve. Future year budget requirements for 2022/23 and 2023/24 will need to be identified and included as part of the budget setting process.

Legal Implications

50. The Council has a statutory duty to prepare and maintain a Local Plan for Wiltshire (referred to in legislation as development plan documents), for which

² [Section 182 of the Planning Act 2008](#) [section 19 of the Planning and Compulsory Purchase Act 2004](#).

the process is set out in Planning and Compulsory Purchase Act 2004 (as amended) and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

51. Once adopted, the Plan will form part of the statutory development plan for the area and be used as such for determining relevant planning applications across Wiltshire.

Workforce Implications

52. Preparation of the draft Plan has workforce implications across the Council, as well as the Spatial Planning service. For example, specialist input from other services is required in relation to site proposals and policy development, as well as from legal due to the statutory nature of the process. Staff will need to be prioritised to work on the plan as the need arises. This is generally expected to be managed within current workforce capacity but will need to be kept under review.

Options Considered

53. The options open to the Council are limited as Wiltshire Council is legally required to maintain up to date planning policies for the county, and progress should continue to be made in line with the commitment in the Council's Local Development Scheme.
54. Government has set a target and expects up to date local plans to be in place by December 2023. Even with some slippage that may occur due to the weight of consultation response and the need to give this full consideration and develop further evidence, adoption is considered achievable by this target date.

Conclusions

55. The consultation has enabled the views of the local community and other stakeholders to be captured, which will inform important elements of the Local Plan. Further work now needs to be undertaken to develop the evidence base and consider in full the issues raised.

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Appendices

Appendix 1: Summary of main issues raised through consultation on Wiltshire Local Plan Review

Appendix 2: Wiltshire's Housing Market Areas

Background Papers

None

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APPENDIX 1:

Initial summary of main issues raised through consultation on Wiltshire Local Plan Review

1. Introduction

1.1 Consultation to inform the Wiltshire Local Plan closed on 9 March 2021. Overall, in excess of 3,500 representations from 2,682 people and organisations were submitted on the consultation documents. A breakdown of the number of representations is provided in this report below against each consultation document. This summary outlines an initial analysis of the main issues that have emerged from the following consultation documents:

- Emerging spatial strategy
- Empowering rural communities
- Addressing climate change and biodiversity net environmental gain
- Planning for the Principal Settlements (Chippenham, Salisbury and Trowbridge)
- Planning for the Market Towns (12 in total)

1.2 A tabular format is used for each document and the consultation documents can be viewed via this [link](#).

2. Emerging Spatial Strategy (372 comments, 324 respondents)

2.1 The scale of housing was the dominant subject of comments. Most representations were from the 'general public and town or parish councils' and 'developers and agents'. This analysis therefore focuses on these sources as they tend to represent the extreme differences in views and breaks them down into the main areas commented on.

| Amount of housing | |
|---|--|
| General public and Town and Parish Councils | <ul style="list-style-type: none">• The environmental impacts of this number of new homes are too great (both for lower and higher estimates of housing need for the plan period 2016 to 2036).• Infrastructure is insufficient to support it (both for lower and higher estimates of housing need).• Should not exceed the standard method requirement (a higher number will result in difficulties sustaining a five-year supply).• Job growth does not support a higher amount than the standard method calculation.• The amount of housing is being justified to deliver development at Chippenham.• Evidence underpinning housing numbers is out of date due to COVID and impact on economy (housing need is less than estimated). |

| | |
|---|--|
| Developer/agent | <ul style="list-style-type: none"> • A higher number than the standard method is supported; with many supporting the higher end of the range or above. • It should be higher: <ul style="list-style-type: none"> - To boost supply over the assessed need of the Wiltshire Core Strategy (44,000) - By a longer plan period (see below) - To deliver more affordable homes - To reflect recent high levels of delivery (Housing Delivery Test) - To both respond to and support economic recovery - To marry up with the maximum forecasts of five or ten-year migration trends in housing market areas where they differ |
| Climate change | |
| General public and Town and Parish Councils | <ul style="list-style-type: none"> • The strategy does not do enough to address climate change. • It represents business as usual - greenfield and car based. There should be carbon accounting and measurable targets set by the plan. • Lack of employment allocation at Melksham would exacerbate out-commuting and increase carbon footprint. |
| Developer/agent | <ul style="list-style-type: none"> • The strategy should focus growth on “sustainable settlements”, with general support for the main settlements. • Should extend “sustainable settlements” to include local service centres and large villages - both generally and certain settlements named e.g. those well related Swindon and Salisbury (see transport). |
| Transport | |
| General public and Town and Parish Councils | <ul style="list-style-type: none"> • Main settlements are already congested, and additional growth cannot be supported. • Greater emphasis upon accessibility by active modes of travel and brownfield development. |
| Developer/agent | <ul style="list-style-type: none"> • A focus on sustainable settlements can reduce the need to travel and support more sustainable modes. • Settlements near Salisbury (Laverstock and Wilton) and Swindon (Purton and Cricklade) are well located to support more environmentally friendly transport links. |
| Distribution of growth | |
| General public and Town and Parish Councils | <ul style="list-style-type: none"> • Too much emphasis upon greenfield sites and brownfield sites should be prioritised. • The COVID-19 pandemic will change behaviour and release land for new homes (e.g. in town centres). • The decline of town centres should be reversed. • Trowbridge Town Council considers that growth at Trowbridge should be dispersed around the town (village locations and Green Belt review). |

| | |
|---|--|
| | <ul style="list-style-type: none"> Concerns that inability to meet growth in Trowbridge Housing Market Area (HMA) will impact on locations in Melksham Community Areas in adjoining HMA. |
| Developer/agent | <ul style="list-style-type: none"> There is too great a focus on large sites at Chippenham, Trowbridge and (to a lesser degree) Melksham to be sure housing needs can be met in a timely way. (Consequently) higher scales of growth are necessary at other market towns. There is too much of a focus on main settlements when rural settlements can play a greater role than solely meeting local need. Opportunities to extend Swindon west have not been properly considered. There is too much emphasis upon brownfield land. Cotswold Business Park / Kemble Airfield promoted as new community for 2,000 homes (of which a significant part is in Cotswold District Council). |
| Economy | |
| General public and Town and Parish Councils | <ul style="list-style-type: none"> Growth should provide more employment to balance jobs and homes and reduce commuting. Becoming carbon neutral and changing behaviour as a result of the COVID-19 pandemic will affect employment needs. |
| Developer/agent | <ul style="list-style-type: none"> The economic evidence is out of date and needs to be revisited. Further evidence is needed on sectoral requirements. Junctions 16 and 17, M4 are promoted for strategic employment use. |
| Plan period | |
| Developer/agent | <ul style="list-style-type: none"> The end date of the plan should be altered so that it plans at least 15 years ahead at the time of adoption (2038 to 2040). The plan baseline should be brought up to date so that it plans positively for the future (2020 or 2021). |
| Neighbourhood planning | |
| General public and Town and Parish Councils | <ul style="list-style-type: none"> Confusion about neighbourhood plan requirements for towns, and the relationship between the Local Plan and neighbourhood plans. Confusion regarding purpose of brownfield targets and how these relate to the overall requirement for main settlements. |
| Developer/agent | <ul style="list-style-type: none"> The strategy should not rely on a large proportion of the homes needed being brought forward by neighbourhood planning. The relationship between neighbourhood plans and the Local Plan needs to be clarified. |

3. Empowering Rural Communities (337 comments, 158 respondents)

- 3.1 Over half of the comments received were from the general public, with approximately 20% from landowners, developers or their agents and just under 20% from Parish and Town Councils. The main topic of interest was the proposed housing requirements for Local Service Centres and Large Villages. The summary of responses below has been arranged around the proposed changes to strategic planning policy for rural areas, as set out in the consultation document.

Suggestion for 40% affordable housing on sites of 5 or more dwellings

40% Target:

- Many were supportive, with some asking that it be a minimum and others that it should be higher. A 50% target was suggested for Areas of Outstanding Natural Beauty.
- Some felt that it should be less than 40%; with one suggesting baseline target of 20%, with parish and town councils given scope to set higher targets in neighbourhood plans.
- Some highlighted national guidance that allows different targets to be set for different types/locations of sites.
- Others noted that the 40% target will need to be viability tested before it can be justified.
- Some expressed concerns that 'wherever possible' encouraged negotiation of lower provision, whereas others called for greater flexibility to reflect actual need at point in time.
- It was also suggested that a 40% target would compromise quality and mean greater proportion of larger homes for house builders to meet profit expectations.

The 5 dwelling threshold:

- Concerns that a 5 dwelling threshold would encourage developers to breakup larger sites.
- A 5 dwelling threshold is inconsistent with national policy and presupposes that applications for Designated Rural Status would be successful.
- A 5 dwelling threshold would impact on site viability in rural areas.
- Lower threshold of 2 dwellings was suggested in AONBs.
- Some support; thresholds higher than 5 (such as 10) would mean reduced affordable homes in rural area.

Revised Core Policy 44 - community led housing in rural areas

- General agreement and support for the proposed policy. However, concerns also raised.
- Some considered maximum homes on sites should remain as 10; others suggested 20 homes on some sites would be unviable - increase to a maximum of 30 dwellings, being no larger than 5% of the existing village size.
- Housing needs assessments to cover both affordable and market housing.
- 'Community support', 'genuine local need', 'community led' and 'affordable' should be clearly defined

- Inclusion of Community Led Homes (CLH) is supported; should reflect that can be provided by groups other than Community Land Trusts e.g. co-operatives
- 25% market homes cross-subsidy not justified.
- Concerns that allowing cross-subsidy of up to 50% market homes on CLH sites is too high, although some also felt that it should apply to all schemes.
- Self-build homes can't be retained as affordable in perpetuity.
- An additional exceptions policy is needed to support both affordable and market custom/self-build housing.
- Appropriate housing density should be one of the policy criteria.
- Provision should be made for down-sizing/retirement homes.
- Doesn't reflect proper use of brownfield sites.

Restricting permitted development rights to prevent small homes in rural areas being increased in size or replaced by larger homes

- Views were mixed. Whilst some were broadly supportive, many others were against.
- Wrong to restrict/withdraw permitted development rights. People extend to accommodate growing families due to restricted supply of larger houses and because moving is unaffordable.
- Would be justified if best way of maintaining good mix essential for vitality of village.
- 'Small' needs to be defined.
- Rural areas are already at disadvantage (poorer transport, more expensive internet, lower speeds, etc). Removing rights compared to those in urban areas is inequitable.
- Extending homes encourages redevelopment of buildings in need of repair. The proposed approach would prevent this.
- National policy encourages need for mix of housing to support local needs and the vitality of rural communities.
- Approach appears at odds with national planning policy, which is clear that policies should be positive and support sustainable development in rural areas.
- National guidance confirms permitted development rights should only be removed in exceptional circumstances. Government is clear that people should be able to alter and extend their own homes, which has led to a significant expansion of permitted development rights reflective of this presumption to support homeowners.
- There is no evidence to justify the approach proposed. Permitted development rights are enshrined in law and a compelling case is needed to withdraw them.
- Should only be applied to new and existing affordable homes regardless of size.
- Need for restrictions should be informed by housing needs assessments; and an understanding of number of households wishing to downsize and composition of the existing housing stock.

Housing figures for Local Service Centres and Large Villages

Method for calculating housing requirements:

- Figures do not seem to be based on clear evidence. Detailed methodology with stage-by-stage results should be published.
- Method should include factors such as:
 - safety and capacity of the highway network
 - access to public transport

- school capacity
- shop/ post office provision
- access to health services
- employment opportunities
- Grade 1 and Grade 2 agricultural land
- availability of sites for development
- proximity to services and facilities in nearby settlements
- how development can contribute to vibrancy of village and support services and facilities

- Method should be simpler, based on percentage increase of the existing population.
- Overall housing requirements allocated to Large Villages and Local Service Centres for each of the HMAs is too high.
- Figure for some places is too high e.g. Shaw/Whitley and Atworth
- Growth should be directed to areas where it will serve to enhance the vitality of communities across the area to support both housing and economic growth.
- Methodology is prejudicial against smaller Large Villages (LVs), imposing disproportionate level of housing upon them – proposed housing requirements for many of the smallest Large Villages is greater proportionately than for some of the Local Service Centres.
- Commitments that match or exceed requirements imposes moratorium on further growth to 2036 at those settlements.

Policy for housing delivery and settlement status

- Local Plan should allocate sites at Local Service Centres and Large Villages and not wait for Neighbourhood Plans or until the site allocations plan is reviewed.
- Should be time limits for how long Neighbourhood Plans will be given to allocate housing sites to meet their requirements.
- High residual housing requirements leave villages wide open for speculative development.
- Housing requirements should be for designated neighbourhood areas rather than settlements.
- Position of settlements in hierarchy should be reviewed to consider changes since they were first identified.
- Winterslow, Redlynch and Morgan's Vale should be reclassified as Small Villages.
- Purton and Lyneham should be reclassified as Local Service Centres.
- Durrington's population is significantly higher than other Large Villages - should at least be a Local Service Centre. No justification for changing status of settlement from Market Town.
- Shaw and Whitley should not be treated as a single Large Village, housing requirement is disproportionate.

4. Addressing climate change and biodiversity net gain (163 comments, 158 respondents)

4.1 Comments generally fell into two groups. The first, those with environmental interests including general public and some parish councils who felt the Plan should be more aspirational in terms of achieving net zero carbon. The second, the more cautious development industry who pushed back questioning cost of building to zero carbon standards and the need for justification. Little evidence was provided through comments to help develop policy themes explored through the consultation. A summary of comments against the five policy themes is set out below.

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| Tackling flood risk and promoting sustainable water management |
| <ul style="list-style-type: none">• Flood risk from all sources should be reduced through an evidence-led assessment process.• Proposals for new development:<ul style="list-style-type: none">- must be safe from flood risk from all sources, including the cumulative effects of flood risk.- should incorporate multifunctional Sustainable Drainage Systems (wherever practicable) alongside natural flood management measures and nature-based solutions.- should include measures to significantly reduce water consumption (e.g. using a standard of 110ltr/day).• Policies must be set for protection of water resources (e.g. Source Protection Zones). |
| Enhancing green/blue infrastructure and biodiversity |
| <ul style="list-style-type: none">• Proposals for new development to be designed with sufficient, accessible and interconnected open spaces.• Trees form an integral element of design of new developments.• Strategy for protecting and enhancing green/blue infrastructure should be linked to expanding the network of active travel routes (wherever practicable).• Proposals for new development should deliver biodiversity net-gains through comprehensive enhancement of existing habitats. |
| Delivering sustainable design and construction methods in the built environment |
| <ul style="list-style-type: none">• Proposals for new development should utilise design features - such as choice of fabric, plot orientation, appropriate massing/density and natural features - to adapt to and wherever practicable mitigate for the effects of climate change.• All new residential and commercial developments should be built to zero carbon standards for energy efficiency.• Some felt that proposals for delivering zero carbon standard developments can be achieved with limited or no impact on scheme viability; but developers questioned the ability to do so. |
| Encouraging sustainable renewable energy generation and management |

- Proposals for new development should have the ability to link to the national grid with limited or no impact on scheme viability.
- Proposals for new development should reduce energy demand and consumption.
- Opportunities for small-scale and large-scale renewable energy schemes should be encouraged and where necessary planned for through allocations of land.
- Wiltshire Council should lead by example in the installation and delivery of renewable energy from all practicable sources.
- Council's 'policy' of not supporting large-scale wind energy schemes should be reversed.
- Greater capture of wind and solar energy should be planned for, subject to the satisfactory mitigation of environmental impacts.
- Greater encouragement and support for the installation of community renewable energy schemes.

Promoting sustainable transport, active travel and improving air quality

- Opportunities for incorporating new Electric Vehicle (EV) charging points and hydrogen fuel refilling facilities should be fully explored and adopted.
- Proposals for new development should be in accessible locations to maximise opportunities for active travel.
- Opportunities for sustainable public transport schemes should be incorporated into major development schemes to encourage modal shift.
- All new development proposals should be adaptable and provide storage areas for bicycles and clothes drying facilities.
- Changes to working arrangements due to the pandemic should be factored into the design of new residential and commercial buildings.

5. Principal Settlements: Chippenham, Trowbridge and Salisbury

- 5.1 In response to the proposals for the three Principal Settlements there were significant representations relating to 'strategic matters' (e.g. the proposed scale, distribution and location of growth, lack of infrastructure, track record of delivery failure on large greenfield allocations, particularly at Trowbridge) and 'site specific' matters (e.g. traffic/congestion, environmental impact, loss of open space, disregard for the character of nearby villages).

Planning for Chippenham (473 comments, 375 respondents)

Summary

There were significant objections in response to the proposals, the scale of housing growth receiving the most comments, alongside objections to the preferred sites. Other specific issues raised by a significant number of respondents, include the need to prioritise brownfield over greenfield land, impacts on transport, landscape and biodiversity, and importance of green infrastructure and addressing climate change. Alternative greenfield sites were suggested including to the west of the A350 and an extension to Rawlings

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| Green allocation. Strategic employment allocations are promoted to the north and south of Junction 17, M4. | |
| Scale of Growth | |
| General public and Town and Parish Councils | <ul style="list-style-type: none"> • Significant objections to proposed level of growth - too high. Comments include how Chippenham is becoming too large and lacks infrastructure; housing numbers beyond Chippenham's needs. • Lead to out-commuting, increasing traffic and effect environment (air and noise pollution.) • Impacts on greenspace and cycleways. • Requests to prioritise redevelopment of brownfield land, higher brownfield land figure, reuse vacant buildings in the town centre and other empty buildings for residential use. • Requests for housing to be distributed to other towns and villages. • Climate change and loss of greenfield land is a concern; retain for farms and food production. • HIF bid pre-determined scale of growth. • Not enough evidence for housing figure. |
| Developer/agent | <ul style="list-style-type: none"> • Support for Chippenham as focus for growth. • Although questions about deliverability of high number of dwellings in plan period, as well as existing allocations. • Mixed support for brownfield target. |
| Other | <ul style="list-style-type: none"> • Prioritisation of brownfield land supported but must be designed sensitively to historic environment. • No robust case for level of growth. Not deliverable. • Excessive loss of countryside and resultant impact; contradicts climate emergency declaration. • Brownfield target implies loss of substantial employment land/space, undermining jobs and homes balance - increasing out commuting (carbon use) and congestion. • Support homes as positive for economic future of town |
| Place shaping Priorities | |
| General Public and Town and Parish Councils | <ul style="list-style-type: none"> • Consider impact of COVID-19 on the town centre and new uses for vacant buildings, including residential uses to strengthen centre; suggestion no need for new employment land. • Disagree that new road is required. • Should emphasise importance of River Avon, other green corridors and separation from surrounding villages (e.g. Tytherton Lucas, Stanley). Concerns about coalescence. • Priorities designed to support new sites, rather than lack of leisure and retail in Chippenham or adverse effects of development on Bremhill Parish. |

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| | <ul style="list-style-type: none"> • Protect: Marden River similar to River Avon; North Rivers Cycle route as important corridor for walkers and cyclists. A road to the East of Chippenham will not ease congestion. Prefer the road to the south of Chippenham. • General support by Chippenham Town Council, as match Neighbourhood Plan Vision - minor amendments for priorities 1 (employment), 2 (town Centre) and 5 (Transport). |
| Developer/agent | <ul style="list-style-type: none"> • Developers comments on the place shaping priorities generally relate to their use in justifying preferred sites. • Owners of Borough Parade and Emery Gate Shopping Centres seeking to change existing shops to residential. |
| Others | <ul style="list-style-type: none"> • Priorities could reflect positive strategy for conservation and enjoyment of the historic environment. • Sport England suggests the creation of a healthy, inclusive sustainable town can be achieved through use of their 'Active Design' guidance. • Priorities are business as usual references to sustainable development, air quality and congestion, town centre investment. Won't create homes or jobs for local people. • Priority 5 is disingenuous due to focus on traffic congestion, which facilitates homes to south of Chippenham. • National Trust objects to southward expansion of Chippenham due to impacts on wider landscape setting of Lacock village and its historic assets. |
| Preferred Sites | |
| General public and Town and Parish Councils | <ul style="list-style-type: none"> • Significant objections to preferred sites. Some support for other options instead, particularly west of A350. • Significant objection to Future Chippenham and HIF proposals - done deal without consultation. • Retain farms and use for local food production. • Petition from 65 Hardens Mead residents seeking some fields to be designated as local greenspace (Site 1, East Chippenham). • Much of Site 1 (East Chippenham) is in Bremhill Parish and not supported by Bremhill Parish Neighbourhood Plan. • Town Council objects to preferred sites: <ul style="list-style-type: none"> - severe adverse impact on town, unacceptable damage to local environment - destruction high-quality farmland and wildlife habitat in Avon and Marden Valley. - New road including 2 river crossings and railway bridge not required without excessive housing numbers. - Sustainability Appraisal site criteria is biased; site selection methodology used to dismiss other options, which would not require costly carbon intensive infrastructure. |

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| | <ul style="list-style-type: none"> - No brownfield or town centre sites included as options despite opportunity to improve town character and vibrancy. - Selected for commercial reasons (Wiltshire Council owned land), to coincide with road route and support business case for a new road. |
| Developer/agent | <ul style="list-style-type: none"> • Developers of land within preferred sites generally supportive; but raise objections on specific points, particularly place shaping priorities and concept plan layouts. • All developers seeking to maximise residential use on their land; less supportive of providing other uses e.g. employment, schools, renewable energy, greenspace. • More housing can be accommodated north of the North Rivers Cycle Route (New Leaze Farm); this has closer links with town centre than other parts of the site. • Promotion of some parts of sites as standalone developments. • Employment land locations would be better located nearer to A4 and/or A350; seeking advice from Local Enterprise Partnership. • Developers for other options consider their sites should be preferred as they do not involve major infrastructure and capable of early delivery - they challenge sustainability appraisal, site methodology including place shaping priorities. • Allocation of Langley Park as a brownfield site is promoted. • Promotion of additional land at existing Rawlings Green allocation to provide more housing and country park. • Promotion of extension to employment site south of M4 Junction 17 and new strategic allocation of land north M4 Junction 17 for employment. |
| Others | <ul style="list-style-type: none"> • Greater clarity needed on how impact on historic environment has informed spatial strategy and site selection considering legislation and national policy. • Some support that sites are the most appropriate. • Proposed economic development helps redress out-commuting and support town centre. • Lack of progress on Rawlings Green will impact on delivery of east Chippenham site. Alternative mix of sites based on lower quantum suggested that benefits from credible public transport. • Recommendation for the completion of hospital link road instead of the southern link road. • County farms should be used for local food. • Objections to all proposed sites. New economic evidence is needed to consider impact of COVID-19 and inform balance of jobs to homes - question need for employment land; retail and offices should be converted into homes. • Support for more homes north of cycle route due to accessibility to town centre and railway. |

| Concept Plans | |
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| General Public and Town and Parish Councils | <p>Detailed comments from Chippenham Town Council:</p> <ul style="list-style-type: none"> • Detail of sites should be left to neighbourhood plan; albeit broad support for land uses. • Infrastructure, renewable energy, green buffer, local green spaces, walking and cycling routes, sustainable building construction and biodiversity net gain most important aspects. • Concerns about impact on villages. • Walking/cycling to link with existing network, urban area, town centre and transport modes. • More employment land to reduce car use. • More land for renewable energy. • Objects to built-up areas either side of cycle route, should be a green corridor as in emerging neighbourhood plan; housing to north contrary to Bremhill neighbourhood plan. • Uses for Hardens and New Lease Farms should be agricultural. |
| Others | <ul style="list-style-type: none"> • Consider Agricultural Land Classification for East Chippenham - site includes soil graded as best and most versatile. • Sewage treatment works in south Chippenham option may need to be expanded, as such residential development would need to be at appropriate distance. • Significant infrastructure, such as bridges, will cross the floodplain and the main river - development of infrastructure must not increase flood risk, and be delivering flood risk betterment for community and new development. • Opportunity to provide a longer length of River Park through the town and beyond should be looked at, including options to replace radial gate, for benefit of biodiversity, amenity and flood risk. • Proposals should demonstrate how responded to the historic environment including historic and landscape setting of the town, as well as historic assets. • Wilts and Berks Canal Trust considers that provision of canal should be integrated into site proposals and construction secured as green and blue corridor with walking/cycling routes. • Location is sought for an indoor community tennis facility at town. |

Planning for Salisbury (357 comments, 289 respondents)

Summary

Significant concerns were expressed by the local community about effects of additional growth, both upon infrastructure and the city's historic landscape setting; and particularly the preferred site North of Downton Road between the city and Britford. Impact on ecology of the East Harnham Meadows SSSI being a key concern as well as coalescence. Fewer

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| <p>objections were expressed about the other two preferred sites, but concerns were raised about impact on historic environment. Considerable support was expressed for brownfield development first from the community with some wishing to see Churchfields brought forward for housing led development. Conversely, the development sector highlights that brownfield is uncertain and may not realise affordable housing that is needed. Alternative sites were promoted.</p> | |
| <p>General Public and City and Parish Councils</p> | <ul style="list-style-type: none"> • Redevelopment of brownfield land should be prioritised, re-use vacant buildings in the centre and elsewhere for residential use; ahead of greenfield/reduce greenfield loss. • Objections mainly to consequences of growth i.e. lagging infrastructure delivery, impact on highways, air-quality, landscape and biodiversity. • More active travel modes needed. • Concerns about loss of greenfield land. • General support for redevelopment of Churchfields for residential rather than retain in employment use, due to concerns about traffic (congestion, air quality) as alternative to greenfield. • Improvement of amenities and facilities needed at Old Sarum. |
| <p>Developer/agent</p> | <ul style="list-style-type: none"> • Comments that housing number for Salisbury should be higher, particularly given demand. • Brownfield development is uncertain and will not deliver. • Salisbury needs affordable housing, more easily realised through greenfield development. |
| <p>Place-shaping Priorities</p> | |
| <p>General public and City and Parish Councils</p> | <ul style="list-style-type: none"> • Concerns that priorities on landscape setting of city and separation with outlying villages (particularly Britford) not properly reflected in preferred sites selected. • Place shaping priority about Central Area Framework and visitor economy should be expanded to incorporate other sectors. • Priority for affordable housing should include explicit reference to key worker, young people and elderly. • Churchfields should be prioritised for redevelopment as Wiltshire Core Strategy to avoid HGVs through city cen • Support for redeveloping Churchfields and r • educing employment. |
| <p>Preferred sites</p> | |
| <p>General public and City and Parish Councils</p> | <ul style="list-style-type: none"> • Significant objections to preferred site North of Downton Road; concerns raised about coalescence of Salisbury with Britford, East Harnham Meadows SSSI, views to Cathedral, loss of landscape character and flooding. |

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| | <ul style="list-style-type: none"> • Salisbury City consider site should be country park, particularly if North of Downton Road is allocated. • Britford parish suggest alternative site option should be considered in combination with preferred site North of Downton Road. • Reduce quantum of development proposed on preferred site North of Downton Road. • Relatively few objections to preferred site South of Downton Road. • Quidhampton Parish Council objects to Quidhampton Quarry (although not preferred site) becoming housing allocation. • Concerns about preferred site North East of Old Sarum due to impacts on landscape and Monarch's Way long distance path, and lack of facilities and amenities at Old Sarum. |
| Developer/agent | <ul style="list-style-type: none"> • Support from developers and landowners of preferred sites; promoter of preferred site South of Downton Road seeking its expansion to include Britford Park and Ride. • Developer associated with alternative option South of Harnham promoting its allocation. • New sites submitted and promoted adjacent to Beehive Park and Ride (Old Sarum), and south-west of Salisbury, adjacent to existing allocation on Netherhampton Road. |
| Others | <ul style="list-style-type: none"> • Objection by Natural England to preferred site North of Downton Road adjacent to East Harnham Meadows SSSI, due to potential impacts from recreation and air quality on the grasslands. • Significant concerns by Highway's England about access to Quidhampton Quarry, albeit recognise it is not a preferred site. • Environment Agency raised concerns about preferred site at Old Sarum, which is adjacent to a Source Protection Zone (vulnerable to pollution). • Historic England raised concerns about: how development of preferred site at Old Sarum could be accommodated in sensitive and historic landscape setting; and for preferred sites at Downton Road, whether heritage and landscape constraints have been appropriately taken into consideration (Woodbury Scheduled Ancient Monument and heritage assets at Britford). • National Trust is concerned about further north-wards expansion of Salisbury that would have adverse impacts on landscape setting of Figsbury Ring (scheduled ancient monument). |
| Concept Plans | |
| General public | <ul style="list-style-type: none"> • Significant objections to Site 6, North of Downton Road (reasons see above). • Some support for custom and self-build housing. |

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| Developers and agents | <ul style="list-style-type: none"> • Concerns over inclusion of custom and self-build housing. • Developers of preferred sites at Old Sarum and North of Downton Road have presented different approaches. |
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Planning for Trowbridge (397 comments, 360 respondents)

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| Summary | |
| <p>There was a significant level of objection to the scale of growth and preferred sites at Trowbridge. Traffic, specifically the volume and congestion that development would bring to that part of Trowbridge, Hilperton and Staverton receiving the most comments. Other specific issues raised, like Chippenham, include: the need to prioritise the redevelopment of brownfield sites first; the scale of growth (housing need), flood risk, infrastructure provision, biodiversity and landscape. Alternative sites were promoted through the consultation.</p> | |
| Scale of Growth | |
| General Public and Town and Parish Councils | <ul style="list-style-type: none"> • Mixed opinion. However, more objections than support for proposed level of growth (reasons below). • Post COVID-19 and Brexit impacts not yet known. • Town needs regeneration and lacks adequate infrastructure. • Some requests for housing to be distributed to other towns and villages; including at Southwick and North Bradley or a new settlement created. • Scale of preferred sites inappropriate for Hilperton and Staverton – Hilperton is a Large Village, scale of growth contrary to Wiltshire Core Strategy. • Preferred sites would exacerbate commuting on congested roads and increase flood risk. • Allocated employment land should be considered for homes. • Growth should not be artificially inflated to justify a secondary school - rationale for secondary school is not explained. • Prioritise redevelopment of brownfield land, including vacant buildings in town centre, and set higher brownfield figure. • Objections due to climate change and loss of greenfield land. • Long-established, naturally integrated green spaces between settlements must be safeguarded against inappropriate development for mental and physical well-being. • Integrity and identity of Semington village must be maintained and protected from over-expansion of Trowbridge. |
| Developer/agent | <ul style="list-style-type: none"> • General agreement with Trowbridge's Principal Settlement status as focus for growth and level of growth, some stated it wasn't high enough. |

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| | <ul style="list-style-type: none"> • Other comments impact of COVID-19 not yet known - advocates more decentralised strategy to meet growth with more development to market towns and rural areas. • Support for strategic site to be allocated that transcends into next plan period. Site large enough to promote self-containment • Suggestion that Trowbridge could do more if other settlements more constrained. • Growth distribution strategy too weighted towards large scale complex sites adjacent to principal settlements and less reliance should be placed upon volume home builders to deliver a small number of complicated strategic sites (for which there is poor delivery track record in Wiltshire). • Smaller sites, separate from the main allocation, will enable choice for developers and provision of self-build plots. • Brownfield target too high. • Economic evidence out of date; plan should enable more employment generating development. • Greenbelt review required at town. • New housing sites promoted: Green Belt sites; employment allocation at Ashton Park; additional land adjacent to preferred options. |
| Others | <ul style="list-style-type: none"> • Historic England consider greater clarity needed on how level of growth and proposals have considered and responded to historic environment (landscape setting and heritage assets). • Prioritisation of brownfield land, including underused heritage buildings, is supported but must be designed sensitively to historic environment. • Reappraise employment and economic growth and take realistic approach to housing numbers for a town which is swamped with commuters. |
| Place shaping Priorities | |
| General Public and Town and Parish Councils | <ul style="list-style-type: none"> • Few comments from local councils, suggestion that vague and ineffective. • Some stated that the priorities are reasonable, but the strategy seems to bear little relationship to them. • Order of priorities should refocus on sustainability and climate change. • Impact of COVID-19 on town centre and new uses for vacant buildings (including residential uses), should be reflected. • Provision of services and amenities, such as health, play provision and the re-generation of the town centre should be prioritised. • Prioritise protecting village identities and importance of green infrastructure (including green belt and spaces), development should take place within town boundary not encroaching on villages. |

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| | <ul style="list-style-type: none"> • Priorities are nearly all focused on the town, not enough about the villages and important greenspace around them. • Staverton should be one of the villages identified. Addressing traffic impact around the town and surrounding area should be prioritised e.g. Staverton bridge and Hilperton village despite Elizabeth Way. |
| Developer/agent | <ul style="list-style-type: none"> • Broad support for priorities. • Right priorities but don't appear to have necessarily informed preferred strategy for town. • Wording in priority (v) (bat mitigation) should be reviewed to ensure it has a 'place-shaping' focus and not one that limits development sites. |
| Others | <ul style="list-style-type: none"> • Historic England suggests the priorities could reflect positive strategy for conservation and enjoyment of the historic environment. • Sport England suggests the creation of a healthy, inclusive sustainable town can be achieved through use of their 'Active Design' guidance. |
| Preferred Sites | |
| General Public and Town and Parish Councils | <ul style="list-style-type: none"> • Considerable objections to all preferred sites. • Location for growth inappropriate - it does not share a contiguous boundary with the town; and goes beyond recently adopted settlement boundary. • Specific concerns about: <ul style="list-style-type: none"> - traffic generation and congestion in Trowbridge, Hilperton and Staverton, impact on road network including Staverton Bridge and walking and cycling; - exacerbation of flood risk; - lack of infrastructure, including health care and local services; - loss of farmland; - impact on biodiversity and landscape; - loss of market value of existing homes • Brownfield sites should be prioritised before greenfield - develop Bowyers site, East Wing, unused commercial land and premises etc • Capacity of preferred sites far exceeds any "local" needs. • Alternative sites/strategies suggested: Green Belt release (better locations to Trowbridge centre and station), dispersing growth to Southwick and North Bradley villages; adjacent to Green Lane Wood; Biss Farm employment allocation; either side A361 beyond rugby club; new settlement elsewhere (Hullavington, east of Devizes or west of Salisbury); locate neat new roads West Ashton, Melksham and Chippenham. |

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| Developer/agent | <ul style="list-style-type: none"> • Support from land promoters within preferred sites, with feedback on proposals and objections on specific points on concept plan layouts. • Close collaborative working will be needed between Council and developer to ensure no viability challenges are created through development assumptions and policy requirements. • Developer's concern about extent of open space on their part of the allocation, preferring to see more housing. • Promoter of North East Trowbridge preferred site considers that land at Paxcroft Farm could be provided as 'Suitable Alternative Natural Greenspace' to provide recreation facilities to avoid harm to bats. • Questions raised about: site selection methodology and how Green Belt land has been dismissed; what is meant by a self-contained sustainable community; relationship of Staverton Road Bridge improvements to the preferred sites. |
| Others | <ul style="list-style-type: none"> • Natural England: Concerns raised, as preferred sites are in a medium risk area associated with important bat populations, ecological connectivity with the Kennet and Avon Canal important. Further assessment is needed and updating of Trowbridge Bat Mitigation Strategy to consider functionality of landscape including Hilperton Gap. • Local Plan must also consider potential designation of Trowbridge Woods as a SSSI. • Concerns raised by Wessex Water about scale of development, which is significant and requires major investment in networks and treatment. Clear guidance needed as to timescales and phasing to ensure strategies and investment can be in place. • Historic England suggests that greater clarity needed on how landscape setting of town and historic environment has informed site selection in accordance with national policy. |
| Concept Plans | |
| General Public and Town and Parish Councils | <ul style="list-style-type: none"> • Rather than providing comments about the concept plans, comments generally focused on in principle objections to the preferred sites being allocated (as set out above) - other comments relate to land being used for food production, open space for recreation. • Most disagree but conclude, if going to be built should: <ul style="list-style-type: none"> - Examine potential for district heating systems. Otherwise use solar energy on homes. Mixed views on wind power. - Consider water source heat pumps utilising the canal as a heat source. |
| Others | <ul style="list-style-type: none"> • Solar panels on roofs of all new buildings/ retrofitted on old buildings where possible. |

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| | <ul style="list-style-type: none"> • New construction must meet highest standards of energy efficiency |
| Developer/agent | <ul style="list-style-type: none"> • Questions rationale for allocating green space on majority of site being promoted as part of preferred site, when series of smaller open spaces throughout the new allocation may be more appropriate. • Location of proposed uses are not agreed, and alternative plans are promoted. • Some support for masterplan and design code approach. |

6. Market Towns

- 6.1 Generally each local community was concerned about the scales of growth being proposed. Many wished to see brownfield development prioritised and as much as possible delivered so that it is the only form of development. Communities expressed how much they valued the character and setting to their settlements and saw greenfield development as likely to be harmful in those respects.
- 6.2 Developers on the other hand most often considered that scale of growth at Market Towns should be higher. Many supported this view on the basis that too many homes were being focussed at the Principal Settlements, contrasting the large urban extensions proposed there with the opportunities they said they could provide to deliver housing sooner and more easily.
- 6.3 There was more consensus around place shaping priorities. These seemed to be broadly in tune with the views of each community. However, there were additional suggestions, alongside questioning of how priorities could be achieved.
- 6.4 The pool of sites suggested at each Market Town attracted a good proportion of comments from both the local community and others. These included comments from statutory agencies, like Natural England and Sport England, to sites that affected their interests, for example because of potential impacts on nearby Areas of Outstanding Natural Beauty or for potentially impeding the use of playing fields.
- 6.5 Historic England advises that the form and character of a town, within its wider landscape and historic setting, and the availability of suitable sites should inform the proposed scale of growth. To this end, it is suggested that the Council prepares a Heritage Topic Paper for each settlement and ensures that Conservation Area appraisals and management plans are kept up to date.
- 6.6 The Environment Agency highlight that Amesbury, Salisbury, Warminster, Devizes are within the River Hampshire Avon catchment which is currently failing protected area and Water Framework Directive objectives because of elevated phosphorus.
- 6.7 A summary of the main issues raised for each Market Town is set out below in alphabetic order.

| Planning for Amesbury (18 comments, 18 respondents) | |
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| Respondent Type | Main Issues Raised |
| Prescribed bodies including Town and Parish Councils | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Town Council supports self-sufficient communities and balanced housing and employment growth. They are concerned the 350 additional homes suggested are top-down without adequate consideration of local factors. • Town Council support separating Amesbury from Bulford and Durrington, but clarification is needed on each settlement's future housing requirement. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Sport England supports the priority to improve recreational facilities and sports pitches in Amesbury. • Town Council agrees with all place shaping priorities but considers that self-sufficiency also requires enough infrastructure to balance development. <p>Pool of Sites</p> <ul style="list-style-type: none"> • MoD objects to Site 3 (south of Amesbury) due to the Aerodrome and Technical safeguarding zones associated with Boscombe Down. Natural England also highlights provisionally as Grade 3 Agricultural Land Classification (ALC) • Natural England objects to Site 2 (rear Countess services) – as it supports mixed area of both Deciduous Woodland and Lowland Fen registered as Priority Habitats. • Wessex Water prefers Sites 1 (north of Amesbury, south A303) and 3 (south of Amesbury) as seeming the most appropriate for connections to water services. Site 2, adjacent to sewage treatment works with a risk of reduced amenity due to fly and odour issues. • Town Council raises concerns for all three sites. Site 1 overlooks the A303; Site 2 is close to river and Site 3 is close to Boscombe Down. All three might result in adverse impacts on the World Heritage Site, and recreational pressures on the Salisbury Plain Special Protected Area (SPA). They suggest development of any sites would require contributes towards local infrastructure. • Highways England notes two sites are next to the A303 and there could be noise and air quality issues, which will need to be mitigated alongside any other impacts on the integrity of the asset. <p>Other</p> <ul style="list-style-type: none"> • Town Council suggests effects of the pandemic, move towards a Net Zero economy and increased working from home will change |

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| | <p>the needs of the population and shape requirements for Amesbury.</p> |
| Developer/agent | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Scale of growth should be increased because Amesbury not only serves residents of the town but also neighbouring areas. • Residual housing requirement should be increased from 350 dwellings to a minimum of approximately 1,500 dwellings for the period 2018-2040. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • New proposed site at South West Amesbury could potentially deliver or facilitate several of the priorities by the provision of new in infrastructure. • Site 3 is large enough to accommodate a mixed-use development that includes new land for employment. <p>Pool of Sites</p> <ul style="list-style-type: none"> • New site proposed on land adjacent to High Post Business Park - 146.5 acres of land for employment use. • New site proposed on land west of A345 to the south of High Post (Fourmile Hill) - 355 acres of land for mixed use development. • New site proposed on land South West Amesbury as a development of approximately 1,200 new homes to include local village centre, community facilities, potential health hub, new primary school, green space and mobility hub. |
| General Public | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Views on the scale of growth were mixed. Some saw Army Re-basing already filling the towns 'quota' of additional homes. <p>Place shaping priorities</p> <ul style="list-style-type: none"> • Priorities were generally acceptable. • Additional infrastructure was necessary to accompany any additional growth. Health services and education provision is particularly limited. • With few jobs there was little encouragement to live and work within the town. <p>Other</p> <ul style="list-style-type: none"> • The town needed to be served by more shops |
| Others | <p>Scale of Growth</p> <ul style="list-style-type: none"> • A local councillor suggests Amesbury has seen significant growth and that scale of development proposed would further constrain |

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| | <p>already limited infrastructure. There are also limited brownfield sites.</p> <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • A local councillor supports the priorities but suggests the integration of Boscombe Down and Amesbury should be included. • Priorities supporting future development of Porton Down and Boscombe Down should be included. <p>Pool of Sites</p> <ul style="list-style-type: none"> • A local councillor advises that Site 1 floods, noise pollution would be problematic on Site 2 and Boscombe Down could have adverse impacts on Site 3. <p>Other</p> <ul style="list-style-type: none"> • Stagecoach support development on Land South West Amesbury, as it could underpin delivery of public transport infrastructure. |
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| Planning for Bradford on Avon (674 comments, 667 respondents) | |
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| Respondent Type | Main Issues Raised |
| Prescribed bodies including Town and Parish Councils | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Natural England advise that air quality impacts from growth should be assessed. • Town Council considers the scale of growth acceptable if it can be delivered on brownfield sites determined by neighbourhood planning. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Town Council suggests there should be more detailed reference to the need to address the climate emergency and biodiversity. • Town Council also considers there should be stronger recognition of heritage, landscape setting and infrastructure constraints affecting the town. • Town Council question's whether land should be provided for employment. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sport England objects to Site 3 (golf course) unless golf course is shown to be surplus and Natural England raise concerns about potential loss of green infrastructure. • Of three sites, Town Council suggested only a small part of Site 2 (land north of Holt Road) might have some potential for |

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| | <p>development. Any sites should be identified by neighbourhood planning.</p> |
| Developer/agent | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Scale of growth should be higher as the town has a range of services and facilities and a pronounced need for affordable homes. • A supply relying on small windfall sites cannot respond flexibly to changes in demand and will not deliver affordable homes. • Town does not have a good supply of previously developed land and the role of a brownfield target is unclear. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Proposed growth will not be enough to address the priority for affordable housing in the town • Employment and economy is stated as a priority but no provision suggested for additional land. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sites 2 (land north of Holt Road) and 3 (golf course) have been promoted for development confirming availability. • Site 1 (allotments) has not been formally promoted but it has been suggested that it can be developed in combination with site 2, with relocation of allotments to an area within site 2. • Alternatives or additions to the sites are promoted at the Football Ground, North of Poulton Lane, Land parcels off Bath Road, Leigh Road West and Trowbridge Road (to rear of Beehive). All except the football ground are Green Belt. <p>Other</p> <ul style="list-style-type: none"> • There should be a review of Green Belt boundaries and the neighbourhood plan should plan more positively to meet needs. |
| General Public | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Scale of growth too high and would exceed the capacity of local infrastructure. It would create unacceptable environmental harm, including to local air quality. • Small minority supported a higher scale pointing to a local need for affordable homes. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • No proposals for additional employment land provision undermine a priority to support the economy. • Strong support for pedestrian/cycle bridge across the River Avon. • Town should have a by-pass. • Green space and biodiversity should have greater recognition. |

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| | <p>Pool of Sites</p> <ul style="list-style-type: none"> • Significant scale of objections to all three sites for a variety of reasons, particularly Site 3 (golf course). Sites 1 and 3 (allotments) are valued community spaces • Some indicated that site 2 would be preferred out of the three and a minority of others thought that the golf course would be preferable. • Sites were suggested adjacent to Beehive (Green Belt), the undergrounding of Station Car Park to free up land and land along Winsley Road (Green Belt). <p>Other</p> <ul style="list-style-type: none"> • Some suggested that homes could be provided by converting vacant retail. • Impact of COVID-19 and the future of the town centre were raised as concerns |
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| Planning for Calne | |
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| Respondent Type | Main Issues Raised |
| Prescribed bodies including Town and Parish Councils | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Town Council accepted suggested scale subject to concerns about employment and infrastructure being addressed. Employment land at Oxford Road and Spitfire Way should be safeguarded and employment provided as a priority. • Significant additional growth could potentially deliver an eastern bypass. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Town Council listed key priorities as: <ul style="list-style-type: none"> - Protect and provide sites for employment - early provision; - Provision of open space and allotment land; - Provision of land suitable for cemetery space; - Improvements to existing and new pedestrian and cycle routes; - A Town Centre levy; and - Provision of Primary School places and NHS services. • Calne Without Parish Council believes the priorities should be determined in the Neighbourhood Plan and include provision of infrastructure such as broadband in rural areas. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Calne Without Parish Council consider it would be appropriate to examine the feasibility of developing sites that would bring together existing new development on the edge of town |

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| | <ul style="list-style-type: none"> • Natural England raise concerns about the cumulative impacts that development of sites 2, 3 and 4 may have on the Area of Outstanding Natural Beauty • Wessex Water state that sites to the west of Calne have more potential spare capacity, although significant development to the east could lead to significant capacity improvements • Historic England note that several proposed sites adjoin or affect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability |
| Developer/agent | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Calne is capable, and suitable for accommodating a higher level of growth to meet housing needs and to support economic growth. • Proposed level of growth should be higher to achieve transport solutions to alleviate air quality issues. • Calne is not significantly constrained in environmental terms. • Question whether brownfield sites are available for 60 dwellings and can be viably developed. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Meeting the range of housing needs, particularly for older people and affordable homes, should be recognised by a higher scale of growth. • It is stated in the settlement profile for Calne that significant additional growth could potentially deliver an eastern bypass - this should be included in the strategic priorities. <p>Pool of Sites</p> <ul style="list-style-type: none"> • General agreement that this is the right pool of sites for the Council to be considering at this time; but Council need to demonstrate they have considered all reasonable alternatives. • Given past delivery rates of new homes on brownfield land it is highly unlikely that Calne's housing needs can be met in full using brownfield land. • Three new sites were put forward for consideration through the site selection process. |
| General Public | <p>Scale of Growth</p> <ul style="list-style-type: none"> • There is a lack of infrastructure at Calne to cope with significantly higher growth. • Brownfield target should be much higher. • Any growth should lead to improvement in town centre services and amenities. • Significant number of comments supporting an eastern bypass between Sand Pit Rd and A4 at Quemerford. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Priorities are supported but question how they will be achieved. |

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| | <ul style="list-style-type: none"> • Town centre regeneration urgently needed - town has a much larger population than the centre would suggest with a lack of shops, pubs and amenities. • GP, dental surgeries and more shops are needed. • Growth should seek transport solutions to alleviate town centre congestion and air quality concerns. • Local green spaces and biodiversity are highly valued by local people. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Any development should make full use of all available brownfield sites before encroaching onto greenfield sites. • Sites around Calne received various objections and support depending on where people live. • Sites should be chosen that have good access to the transport network and employment. • Sites to be developed should be decided through the neighbourhood plan process. • Site 4 is very large and if developed should provide for an eastern bypass linking Sand Pit Road/Oxford Road with the A4 at Quemerford. <p>Other</p> <ul style="list-style-type: none"> • Desire to develop links with Bath University, Swindon colleges and other centres of learning to create opportunities for new environmental and economic business to revitalise Calne • Important that any development is aesthetically pleasing, allowing residents to integrate into the community, adding value to the town • Sustainability needs to be given much greater importance in all respects - site location, method of building, house insulation, heating systems, cycle routes, access to public transport etc. |
| Others | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Scale of growth should be constrained until Neighbourhood Plan has completed an assessment of town centre brownfield sites in the light of pandemic. |

| Planning for Corsham (40 comments, 40 respondents) | |
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| Respondent Type | Main Issues Raised |
| Prescribed bodies including Town and Parish Councils | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Town Council considers levels of growth above those proposed would put undue pressure on local health services. <p>Place Shaping Priorities</p> |

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| | <ul style="list-style-type: none"> • General support for the priorities with rewording suggested. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Town Council support for sites 5 (The Circus), part of 3 (Land east of Lypiatt Road and west of B3353) and part of 4 (Land east of Leafield Trading Estate and west of Lypiatt Road). • They also outline opportunities to consider land excluded at Potely Rise and Copenacre. • Town Council object to further consideration of Sites 1 (Pickwick Paddock, Bath Road), 2 (Land South of Brook Drive), and 6 (Land to the North of 16 Bradford Road). • Natural England objects to Sites 5 (The Circus) and 6 (Land to the North of 16 Bradford Road) due to potential impacts on Bath and Bradford on Avon Bats Special Area of Conservation (SAC), Box Mine Site of Special Scientific Interest (SSSI), Corsham Railway Cutting SSSI and Cotswold Area of Outstanding Natural Beauty. • Potential for all sites to impact on Bath and Bradford on Avon Bats SAC. Detailed consideration of this is required during further assessment. <p>Other</p> <ul style="list-style-type: none"> • Need to protect the local mining industry. • Protection of the green buffer. • Local infrastructure improvements i.e. healthcare and roads. |
| Developer/agent | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Support for additional growth at Corsham. • Opportunity to increase requirements at Corsham to ensure housing needs are met across Chippenham Housing Market Area. • Brownfield target should be avoided or clearly evidenced. • Plan period should be extended and the housing requirement for Corsham increased to reflect this. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Development to south of Corsham would help avoid coalescence with villages to the west and should be a priority. • A priority should be the enhancement of existing public transport. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Brownfield sites should be included in the pool, including former RAF Rudloe Manor and other brownfield sites which fall outside of, but are well related to, main settlements. • General support provided for pool of sites as proposed. • All sites are actively promoted, except Site 5 (The Circus), which is not available for development at this time. |

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| | <ul style="list-style-type: none"> • Three sites excluded at stage two are promoted. |
| General Public | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Additional growth should be as minimal as possible and is potentially too high as proposed. • Any additional homes should be on brownfield sites. • Need for clarity relating to the brownfield target, which is higher than the residual number of homes to plan for. • Transport infrastructure improvements and local facilities, such as schools and healthcare need to accompany new development. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Priorities need updating to reflect impacts of the COVID-19 pandemic on shopping habits. The need for the provision of a second supermarket is questioned. • Need for improved social infrastructure, particularly local health services. • Addressing climate change, particularly renewable energy opportunities, need to be incorporated. • Local transport infrastructure improvements, particularly sustainable transport modes. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Generally, the further consideration of any greenfield sites is argued. Brownfield sites within the town should be considered. • All sites are subject to objections, most pointedly Sites 3 (Land east of Lypiatt Road and west of B3353) and 4 (Land east of Leafield Trading Estate and west of Lypiatt Road). • Some support for Sites 1 (Pickwick Paddock, Bath Road) and 6 (Land to the north of 16 Bradford Road). <p>Other</p> <ul style="list-style-type: none"> • Joined up approach needed with carbon reduction targets. |

| Planning for Devizes (118 comments, 111 respondents) | |
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| Respondent Type | Main Issues Raised |
| Prescribed bodies including Town and Parish Councils | <p>Scale of growth</p> <ul style="list-style-type: none"> • Devizes Town Council and Neighbourhood Planning Group (NPG) state that it is not sustainable to plan for more housing than is needed for the local population. Level of growth proposed would decrease self-containment and increase traffic at peak times. More consideration to be given to type of housing needed to suit the population profile. |

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| | <ul style="list-style-type: none"> • Potterne Parish Council supports brownfield development close to the town centre to avoid further traffic congestion. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Devizes Town Council and NPG consider high priority should be given to the North Wessex Down Area of Outstanding Natural Beauty (AONB). More recognition is needed of the landscape setting of the town. • More reference to proposed 'Devizes Gateway Rail Station'; more focus on homes to meet local needs; and more detail on design. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Natural England do not support: Site 1 (land adjoining Lay Wood) due to impact on AONB and restriction on movement of species in Lay Wood from wider landscape to east; Site 2 (land at Coate Bridge) due to impact on AONB. They consider Site 3 (land east of Windsor Drive) would need careful consideration due to AONB setting and nearby allotments as green infrastructure asset. • Historic England seek clarification that proposals have considered and responded to the historic environment - town's history, character and landscape setting surrounding heritage assets. • Devizes Town Council and NPG favours smaller sites in line with the neighbourhood plan, and brownfield sites (Devizes Wharf Regeneration project, hospital site and land linked to Green Lane treatment centre). • Devizes Town Council and NPG object to: <ul style="list-style-type: none"> - Site 1 (Land adjoining Lay Wood) due to impact on AONB setting and distance from the town centre (more than 20 minutes walking distance). - Site 2 (Land at Coate Bridge) due to impact on rural setting. - Site 4 (Broadway Farm) due to distance from town centre. - Site 6 (Greencare Nursery) due to proximity to woods. - Site 7 (Caen Hill Farm and Garden Trading Estate) due to access and impact on landscape setting. • Devizes Town Council and NPG suggest Sites 3 and 5 should be reduced and consider Site 8 suitable due to proximity to town centre. |
| Developer/agent | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Support for the level of growth and calls for a higher housing requirement for Devizes. • Brownfield sites are difficult to deliver, a more balanced approach to housing delivery should be sought rather than brownfield first. • Further greenfield sites should be identified. • Brownfield target is based on historic windfall and there may not be enough deliverable sites. |

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| | <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • There is general support for the place making priorities. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Plan should not just focus on strategic and complex sites but identify moderate and small sized sites. • Brownfield sites have been promoted at: Wadworth Brewery site, Devizes School and two sites that will be surplus to NHS requirements - the old Devizes hospital site when the new Integrated Care Centre opens and Southgate House. • Some housing should be allowed on the Wiltshire Core Strategy Horton Road employment site allocation. • Sites 3 and 4 are being promoted together and can be combined with an adjoining site - land east of Windsor Drive. • Additional land is promoted: to increase Sites 5 and 8, and Site 2 with benefit of connection with the Canal; new land south of Marshall Road has been promoted; existing neighbourhood plan allocation at Hillworth Road is promoted together with an adjoining site. |
| General Public | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Some responses called for development to occur on brownfield sites only. • Scale of growth generally considered to be too high or 'about right' • Those of objecting to high level were concerned about traffic and air quality issues; lack infrastructure including GP surgeries, dentists, roads and schools; loss of agricultural land; impact on wildlife; and landscape impact. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • General support for place shaping priorities. • Further emphasis could be added on protection of natural environment, biodiversity and greater access to green spaces in the town. • Development should not exacerbate traffic problems in town • Consider access to potential Lydeaway train station. • Lack of infrastructure for new housing • Heritage value of town should be emphasised. • Greater recognition of Devizes Wharf regeneration, vitality of the town centre and good design. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Many object to the Site 6 (Greenacres Nursery) due to existing use by community as greenspace as well as its importance for biodiversity, including bats. • Site 6 incorrectly classified as brownfield land. |

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| | <ul style="list-style-type: none"> • Objections to all other Sites, particularly Site 2 (land at Coate Bridge) and Site 5 (land off the A342 and Sleight Road). • Underused retail and commercial units should be redeveloped for housing. • Empty properties should be tackled. • Windsor Drive is an effective outer boundary to the town. |
| Others | <p>Scale of Growth</p> <ul style="list-style-type: none"> • North Wessex Downs AONB consider growth to be okay, and support brownfield target due to landscape constraints at town. • Trust for Devizes consider growth to be about right but raise concerns about growth elsewhere and need to maintain housing land supply to avoid impact on Devizes. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Trust for Devizes consider: higher recognition of AONB and setting of the town is needed; vitality and viability of the town centre must be considered, particularly following COVID; the renewal of Devizes Wharf and restoration of Assize Court are crucial for the town. • The Devizes Assize Courts Trust call for specific heritage related place shaping priority to recognise heritage value in town as well as referencing the aims of the Devizes Wharf project and role that Assize Court play in that. • North Wessex Down AONB comment little weight has been given to the setting of the AONB. <p>Pool of Sites</p> <ul style="list-style-type: none"> • North Wessex Down AONB don't support Sites 1, 2 and 3 due to impact on landscape setting. • Canal and River Trust consider Sites 1 and 2 should contribute to enhancements to the canal towpath. |

| Planning for Malmesbury (61 comments, 61 respondents) | |
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| Respondent Type | Main Issues Raised |
| Prescribed bodies including Town and Parish Councils | <p>Scale of Growth</p> <ul style="list-style-type: none"> • The Town Council (on behalf of the Joint Neighbourhood Plan Working Group (JNPWG)) consider the suggested scale of growth to be unsustainable because of the pressures on local infrastructure that would result; and there is no local need for more homes. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • The Town Council (JNPWG) support recognition and support for the special irreplaceable characteristics of the town, |

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| | <p>including landscape, heritage and ecology. Priorities should extend to climate change and encompass a town centre strategy</p> <p>Pool of Sites</p> <ul style="list-style-type: none"> • The Town Council (JNPWG) identify constraints and object to all the pool of sites. Additional greenfield sites are not needed and should not therefore be considered. • Natural England raise concerns about the impacts that development of Sites 4 and 5 to west of town may have on the Area of Outstanding Natural Beauty • Sport England object to the potential loss of the cricket club in Site 1. <p>Other</p> <ul style="list-style-type: none"> • Town Council (JPNWG) consider there should not be a target for housing on brownfield land. Opportunities are limited and it would lead to the loss of other uses important to the town to residential redevelopment. • Town Council (JPNWG) identify a range of other issues (such as traffic, education and sport and leisure that are referenced in the Neighbourhood Plan) |
| Developer/agent | <p>Scale of Growth</p> <ul style="list-style-type: none"> • The proposed level of planned growth is too low. • The town is a sustainable location for further growth to meet needs for affordable homes and help support local economic growth • There is insufficient justification for curtailing continued growth below past rates <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • A priority to meet the housing range needs, particularly affordable homes, should be recognised by a higher scale of growth • Economic growth prospects should be matched by allocating land for business development <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sites 1, 4 and 5 were supported by developers, landowners or their agents. • Five other parcels of land were suggested as fresh opportunities or land that should not have been rejected |
| General Public | <p>Scale of Growth</p> <ul style="list-style-type: none"> • The proposed level of planned growth is too high. The character and attractiveness of the settlement will be harmed, including access to limited and diminishing green space |

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| | <ul style="list-style-type: none"> • There is insufficient infrastructure to support further significant development. • Levels of growth should respect proposals in the neighbourhood plan. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • There should be greater recognition of the distinctiveness of the town, preserving its historic character and setting. • The town centre has an important role and character that should be protected and supported. • There should be a greater reference to meeting the needs of the young • Priorities should recognise needs for local sports and leisure provision <p>Pool of Sites</p> <ul style="list-style-type: none"> • The scope for development shown by a pool of sites does not correspond to the scale of growth proposed. • The only sites that should be developed are those in the neighbourhood plan or brownfield sites • Site 1 had the most objections largely because of its size, the threat to the cricket club and the impact development would have on the town's surroundings <p>Other</p> <ul style="list-style-type: none"> • There should be a greater emphasis upon tackling climate change. • The character of the town was already under threat from development that would harm it. |
| Others | <p>Pool of Sites</p> <ul style="list-style-type: none"> • The Malmesbury River Valleys Trust highlights the role of site 1 in mitigating flood risks and as a site of biodiversity value. |

| Planning for Marlborough (52 comments, 48 respondents) | |
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| Respondent Type | Main Issues Raised |
| Prescribed bodies including Town and Parish Councils | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Preshute Parish Council voiced objection to levels of housing and employment land that had not directly been tested, believing it unsustainable. Justification base on need for affordable housing is not fully evidenced. • Marlborough Area Neighbourhood Plan Steering Group (MANPSG) and Marlborough Town Council called for more detailed assessment of capacity for brownfield land to provide new homes. |

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| | <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • The MANPSG and Marlborough Town Council generally support for priorities but wished to see the findings of their work on these to be given consideration. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Natural England is concerned by Site 1's proximity to River Kennet SSSI and does not support Site 2 due to proximity of priority habitat. They raise the importance Savernake Forest SSSI and disused railway tunnel for species (bats). • The Environment Agency comments that the effect of climate change on the fluvial flood levels from the river may affect lower areas on Site 1; and as Site 2 lies almost entirely within Source a Protection Zone for Marlborough public water supply borehole it is not taken forward. • Sport England raised concern over Site 3 due to its proximity to playing fields, outlining no land should be developed on or impacting sports facilities. • Preshute Parish Council raised concerns about landscape character and impact on the AONB. • The MANPG and Marlborough Town Council referred to site selection work they undertook to allocate sites within their neighbourhood plan and highlighted that some sites appearing in the Site Selection Report had been identified as unviable. <p>Other</p> <ul style="list-style-type: none"> • The MANPSG and Marlborough Town Council outlined concerns regarding the impact of growth on education capacity, highway network and traffic congestion. • The MANPSG and Marlborough Town Council outlined a need to provide sports and leisure facilities. |
| Developer/agent | <p>Scale of Growth</p> <ul style="list-style-type: none"> • The scale of growth was broadly supported noting the need to provide more affordable homes. • The Council should undertake a more detailed assessment of capacity for brownfield land to provide new homes. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Broad agreement that affordable housing needs are met as part of a mixed and balanced community. <p>Pool of Sites</p> <ul style="list-style-type: none"> • The withdrawal of Preshute from the Marlborough Area Neighbourhood Plan means some sites cannot be considered by the that Plan that may be preferable. This should not influence the Local Plan Review. |

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| | <ul style="list-style-type: none"> • Sites 3 and 4 can deliver a healthcare facility and primary school land. |
| General Public | <p>Scale of Growth</p> <ul style="list-style-type: none"> • There were concerns about the scale of growth being justified by a need of affordable housing that is not fully evidenced. • There was concern that additional housing was not being matched by equivalent new employment. • Growth should not put undue pressure on local infrastructure. In particular there were concerns about the effects of traffic, including HGVs and concerns about air quality. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Many were concerned about protecting the towns assets and character, in particular landscape value and biodiversity of natural space. • The impacts of the COVID-19 pandemic need consideration in relation to changing travel patterns and need for employment land. • Town centre should be enhanced. • Affordable housing should be genuinely affordable. <p>Other</p> <ul style="list-style-type: none"> • There were contrasting views on the role of the Neighbourhood Plan. One view was that neighbourhood planning should allocate sites for development. A different view was that the Local Plan should lead the planning process. |
| Others | <p>Scale of Growth</p> <ul style="list-style-type: none"> • North Wessex Downs AONB support the need for new development but advise this should be prioritised on brownfield land. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • North Wessex Downs AONB broadly support the place shaping priorities, offering refinements. • Higher priority should be given to environmental considerations and net zero by 2030. <p>Pool of Sites</p> <ul style="list-style-type: none"> • North Wessex Downs AONB did not support the pool of potential development sites due to landscape sensitivities and ecological habitats. Consideration should be given to dark skies. |

Planning for Melksham (102 comments, 95 respondents)

| Respondent Type | Main Issues Raised |
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| <p>Prescribed bodies including Town and Parish Councils</p> | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Joint response of Melksham Without Parish Council (MWPC), Melksham Town Council (MTC) and Melksham Neighbourhood Plan Steering Group (MNPSG) - consider there has been a disproportionate uplift to Chippenham HMA and thus Melksham specifically. • MWPC/MTC/MNPSG wish to see additional employment land allocated at Melksham • MWPC/MTC/MNPSG strongly supportive of development of brownfield land being prioritised • Wessex Water consider development proposed at Melksham is significant and appraisal will be required to consider solutions and how best to direct investment for growth. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • MWPC/MTC/MNPSG generally supportive of priorities but suggest some amendments. • MWPC/MTC/MNPSG - Melksham and Bowerhill have reached a point where much of its existing market town infrastructure is at or over capacity. Growth must be linked to delivery of infrastructure (schools, healthcare and community facilities) and investment in the town centre. • MWPC/MTC/MNPSG supportive of A350 bypass but consider larger scale planned growth should be delivered with and not before its delivery. <p>Pool of Sites</p> <ul style="list-style-type: none"> • MWPC/MTC/MNPSG consider that Sites 1, 9, 10, 11, 13, 17 are most suitable for development and suggest an alternative site (Cooper Tires brownfield site) is also suitable. • Historic England note several sites adjoin or affect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability. • Semington Parish Council is seeking a 500m no development zone to the north of the Kennet and Avon canal if Sites 5, 6 or 7 are allocated for development. • Sport England is concerned that Site 1 would prevent Melksham football and rugby club from expanding its facilities and that careful masterplanning will be required <p>Other</p> <ul style="list-style-type: none"> • Canal & River Trust request early engagement if bypass route to cross River Avon • Environment Agency highlight need for detailed flood risk assessment for the Melksham link project that will connect with |

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| | <p>the River Avon; and potential for integrated approach to navigation and flood risk.</p> |
| Developer/agent | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Most consider level of growth is appropriate, but some think it is too low. • Town is a sustainable location for further growth to meet needs for affordable homes and support local economic growth • Seek review of decision not to allocate employment land at Melksham. • General support for brownfield site development but this should not impact on the overall phasing and delivery of other sites that will be required. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • General support for the priorities. • Support the proposed A350 bypass as it is needed as a strategic corridor. • Education, health care and transport improvements are rightly key infrastructure priorities that need to be addressed by new developments. <p>Pool of Sites</p> <ul style="list-style-type: none"> • General support for the pool of sites proposed. • Acknowledgment that several large sites may be needed to meet housing requirement. • Three new sites were promoted for development (land at Verbena Court/Eastern Way, land north and west of Manor Farm and land between Eastern Way and Site 1). |
| General Public | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Proposed level of growth is far too high for a town the size of Melksham. • Melksham should retain its rural market town feel. • There should be a more equal distribution of new housing to other settlements in the HMA. • Brownfield target is not ambitious enough. • This high level of growth will add to coalescence with the villages of Bowerhill and Berryfield. • There is insufficient infrastructure to support further significant development, especially schools, GP surgeries and dentists. • Significant growth should not come forward before a bypass is in place as it will only add to A350 traffic congestion. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • General support for the priorities. |

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| | <ul style="list-style-type: none"> • Natural environment along the River Avon corridor should be protected. • New development must support regeneration of the town centre. • Widespread support for Wilts & Berks Canal restoration. • Kennet and Avon Canal must retain its rural character. • The town needs more GP and dental surgeries and a new secondary school. • There is generally a mixed response to the need for an A350 bypass - some believe it is urgently needed, some believe it is not a priority. <p>Pool of Sites</p> <ul style="list-style-type: none"> • There should be a policy of developing brownfield sites first and a higher brownfield target. • The only sites that should be developed are brownfield sites and those allocated through the neighbourhood plan process. • A priority should be the redevelopment of the Cooper Tires site which could aid town centre regeneration. <p>Other</p> <ul style="list-style-type: none"> • There should be a greater emphasis on tackling climate change and enhancing biodiversity. • An eastern bypass will have significant landscape and biodiversity impacts. • Infrastructure, especially schools, transport and healthcare must come first before any new housing. |
| Others | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Stagecoach consider that Melksham has potential to support growth on a strategic scale and they see scope to develop the level of public transport provision substantially • National Trust is concerned that development to the north and east of Melksham will add to rat-running issues through Lacock. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Strong support for the safeguarding of route for the canal and restoration by Wilts and Berks Canal Trust. |

| Planning for Royal Wotton Bassett (59 comments, 57 respondents) | |
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| Respondent Type | Main Issues Raised |
| Prescribed bodies including Town and Parish Councils | Scale of Growth |

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| | <ul style="list-style-type: none"> • Royal Wootton Bassett Town Council is only supportive of the proposed level of growth if it can be assured that the infrastructure improvements to support it can be delivered. • Wessex Water state that significant improvements are likely to be required to support this scale of growth. • Highways England notes a potentially significant level of development and obstacles to overcome if growth is to be successfully delivered (traffic at Junction 16 and within the town), further information is sought on mitigation. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • The Town Council would like to see four additional priorities to reflect those that have emerged from public consultation on the neighbourhood plan review. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Natural England is concerned that Site 7 contains Wootton Bassett Mud Springs SSSI designated for its fluvial geomorphology. • Sport England is concerned that development at Sites 1 and 3 (north of town) could impede the use of adjacent playing fields • Royal Wootton Bassett Town Council do not support: Sites 1 and 2 (north of town), 4 (land at Whitehill Lane) ,7 (south of town) and 8 (land at Woodshaw), but in principle would support Sites 3 (land at Maple Drive), 5 and 6 (south of the town). <p>Other</p> <ul style="list-style-type: none"> • The Town Council do not support the brownfield target, as it is not in accordance with national policy, which requires neighbourhood areas to be given a 'housing requirement' figure. Also, target is based on historic windfall delivery and may not be possible to allocate sufficient sites. |
| Developer/agent | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Scale of growth was generally supported, but it was suggested that higher scales could help meet needs for infrastructure (e.g. health and education). Growth scales reflected the town's relationship with Swindon. • The Neighbourhood Plan could be a platform to bring forward small scale brownfield land to complement Local Plan allocations. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Generally considered to be the right priorities. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sites 1, 3,4,5,6,7 and 8 have all been promoted, Site 2 was not. |

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| | <p>Other</p> <ul style="list-style-type: none"> • Questionable whether brownfield sites are actually available and can be viably developed. |
| General Public | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Growth should be lower and the need for additional employment land was questioned <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Priorities 1 (protecting the distinct character and identity of the town, recognising its proximity to Swindon), 9 (conserving and enhancing environmental assets around Royal Wootton Bassett) and 10 (maintaining the town's elevated historical setting and central conservation area) are considered the most important. • There needs to be a bypass to deal with the town's traffic problems. • Investment in school and GP provision is needed <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sites to the west of the town should be avoided to preserve the historic character of the town. Concerns raised about harm to landscape in relation to the Royal Wootton Bassett escarpment and Dauntsy Vale. • Significant objections to Site 4 (land at Whitehill Lane). These included references to flooding, traffic problems and loss of biodiversity. • Sites 5,6,7 and 8 should be avoided as they are on the floodplain. • Site 8 could cause coalescence with Swindon. |
| Others | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Stagecoach consider quantum for the Swindon housing market area is suppressed, and as such fails to recognise role that Royal Wootton Bassett can play to meet the five delivery principles set out in the Emerging Spatial Strategy document. Higher growth can help support public transport infrastructure. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Wilts and Berk Canal Trust supports the safeguarding of a route and restoration of the canal as a priority. |

Planning for Tidworth and Ludgershall (14 comments, 14 respondents)

| Respondent Type | Main Issues Raised |
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| <p>Prescribed bodies including Town and Parish Councils</p> | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Both Tidworth and Ludgershall Town Councils agree with the scale of growth, but do not support higher levels of housing. • They also support prioritisation of delivering employment at Castledown Business Park ahead of allocating additional employment land; and support limited retail and leisure uses on the site. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Town Councils provide general support for priorities and some rewording. • Ludgershall Town Council propose the incorporation of priority to address climate change, through 'greener' housing. • Environment Agency asks that the need to avoid impacts on River Avon SAC from new development are incorporated. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Both Town Councils provide support for Sites 1 (Land East of Crawlboys Road), 4 (Land at Empress Way), 5 (south-west Ludgershall), 6 (Land North of Wellington Academy) and 7 (Land North of A3026). • Tidworth Town Council is concerned over sites around Tidworth. • Ludgershall Town Council believe Sites are good representation of land availability. • Wessex Water outline water supply requirements as a key consideration for this area, as it is subject to three separate undertakers. • Natural England outline landscape concerns relating to Sites 1 (Land East of Crawlboys Road), 4 (Land at Empress Way) and 5 (south-west Ludgershall). • Objections relating to the potential scale of residential development at Site 4 (Land at Empress Way). • Sport England raised concerns relating to Sites 5 (south-west Ludgershall) and 6 (Land North of Wellington Academy), which are adjacent to playing fields. |
| <p>Developer/agent</p> | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Level of growth proposed is not justified and should take account of the extent of the functional relationship with Andover. • Increasing housing development will support the delivery of Castledown Business Park. The delivery of which should be prioritised ahead of making additional allocations. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Meeting 'local needs' does not reflect the area's strategic role. |

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| | <ul style="list-style-type: none"> • Priorities iv and vi require the delivery of Site 4 (Land at Empress Way). <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sites 5 (south-west Ludgershall), 6 (Land North of Wellington Academy), 7 (Land North of A3026), 8 (Land West of Pennings Road), 9 (North-west Tidworth), 10 (Land South of Bulford Road) and 11 (Land South of The Mall) are unavailable at this time. • Site 4 (Land at Empress Way) is actively promoted. |
| General Public | <p>Scale of Growth</p> <ul style="list-style-type: none"> • The proposed scale of growth is supported. • Additional employment could help overcome Ludgershall's dormitory role. • Castledown Business Park should be able to meet short term employment needs. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • General support for the priorities as written. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Some support for the proposed pool of sites. • Concern that the continuation of Empress Way linking to the A342 to the east would be needed ahead of additional housing development at Site 4 (Land at Empress Way) <p>Other</p> <ul style="list-style-type: none"> • Transport improvements are required to address local transport issues, including road, cycle and pedestrian improvements. • Timing of delivery of a road linking Empress Way to the east of Ludgershall is a key concern. |
| Others | <p>Scale of Growth</p> <ul style="list-style-type: none"> • The current or a lower quantum of housing development is accepted. • A joint neighbourhood plan could be the appropriate vehicle for delivering brownfield sites and affordable housing. • Prioritisation of the delivery of Castledown Business Park ahead of additional employment allocations. • Support for start-ups/small businesses at Castledown Business Park. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Support for the continuation of Empress Way, increased recreation and leisure facilities for younger people and housing to meet locally identified needs. |

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| | <p>Pool of Sites</p> <ul style="list-style-type: none"> • There was strong support for Sites 5 (south-west Ludgershall) and 7 (Land North of A3026). • Salisbury Reds object to the further consideration of Sites 1 (Land East of Crawlboys Road), 2 (Land North of A342), 3 (Land North-East of A342) and 6 (Land North of Wellington Academy) due to distance from the existing bus network. • Public and private rights of way, which cross the railway line will require detailed consideration during further assessments. <p>Other</p> <ul style="list-style-type: none"> • Road improvements are required to address local transport issues, including road, cycle and pedestrian improvements. • Timing of delivery of a road linking Empress Way to the east of Ludgershall is a key concern. |
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| Planning for Warminster (25 comments, 24 respondents) | |
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| Respondent Type | Main Issues Raised |
| Prescribed bodies including Town and Parish Councils | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Chapmanslade Parish Council support the identification of opportunities for housing on brownfield sites. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Chapmanslade Parish Council outline a need to emphasise active travel. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Natural England indicate that landscape and biodiversity are a concern for Site 9 (Land at New Farm). • Environmental Agency states that pollution prevention in relation to River Avon Special Area of Conservation (SAC) is a concern for Site 9 (Land at New Farm). • Environment Agency states risk of contamination of Warminster Malting Public Water Supply boreholes for Sites 5 (Land at Church Street), 6 (Land Adjacent 89 Bath Road), 7 (44 and 48 Bath Road) and 8 (Land at Brick Hill) and also, that sites are within areas where water resources and pollution prevention are a key consideration. • Highways England outline that due to proximity to A36, noise and air quality issues are concerns for Sites 4 (Warminster Common) and 8 (Land at Brick Hill). • Historic England have heritage concerns relating to Site 2 (East Warminster/East of the Dene). |

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| | <ul style="list-style-type: none"> • Sport England objects to Sites 1 (North Warminster/Elm Hill) and 2 (East Warminster/East of the Dene) due to loss of playing fields. |
| Developer/agent | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Risks identified related to a reliance on the delivery of the West Warminster Urban Extension - small/medium sites needed to diversify supply. • Interim Sustainability Appraisal suggests that there is capacity for additional/higher levels of growth. • Reliance on housing delivery through neighbourhood plans should be avoided. • Asks for detailed consideration of cross boundary housing needs and suggests unmet housing needs from Mendip District should be provided for. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • A priority is needed to encourage the delivery of green space alongside new homes. • Support for incorporation of a priority for the use of sustainable materials and construction. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Opportunity to maximise development at the West Warminster Urban Extension should be taken. • Opportunity on land excluded north of Grovelands Way, which is subject to planning permission for specialist housing for older people. • Sites 2 (East Warminster/East of the Dene), 5 (Land at Church Street), 8 (Land at Brick Hill) and 9 (Land at New Farm) have been actively promoted. Site 3 (Land adjacent to Fanshaw Way) is also being promoted, but as part of a larger site area. • Site 1 (North Warminster/Elm Hill) is not currently available for development. |
| General Public | <p>Scale of Growth</p> <ul style="list-style-type: none"> • The proposed scale of growth is accepted and should not increase. • Growth should be directed towards brownfield sites. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Priorities should support redevelopment in the town centre. • Priorities should include: need for GP surgery expansion; tree planting on new developments; flood risk; and the need to protect green space. <p>Pool of Sites</p> |

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| | <ul style="list-style-type: none"> • Redevelopment of brownfield sites should be prioritised ahead of allocating additional greenfield land. • Objections raised to the further consideration of Sites 1 (North Warminster/Elm Hill), 5 (Land at Church Street) and 9 (Land at New Farm). • Support for further consideration of Sites 4 (Warminster Common) and 8 (Land at Brick Hill). |
| Others | <p>Scale of Growth</p> <ul style="list-style-type: none"> • Development in addition to that committed should be directed towards brownfield land/vacant land and buildings. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Priorities should support redevelopment in the town centre and other mixed-use development that could address the town's dormitory role. • Pedestrian, cycle and bus access should be a priority for all new developments to increase access between the town centre and edge of town developments. <p>Pool of Sites</p> <ul style="list-style-type: none"> • The Woodland Trust outline that Site 8 (Land at Brick Hill) is near Norridge Wood Ancient Woodland, which should be considered during further assessment. • Allocation of additional greenfield sites should be avoided. Brownfield sites or the increase in allocation at the West Warminster Urban Extension should be prioritised. |

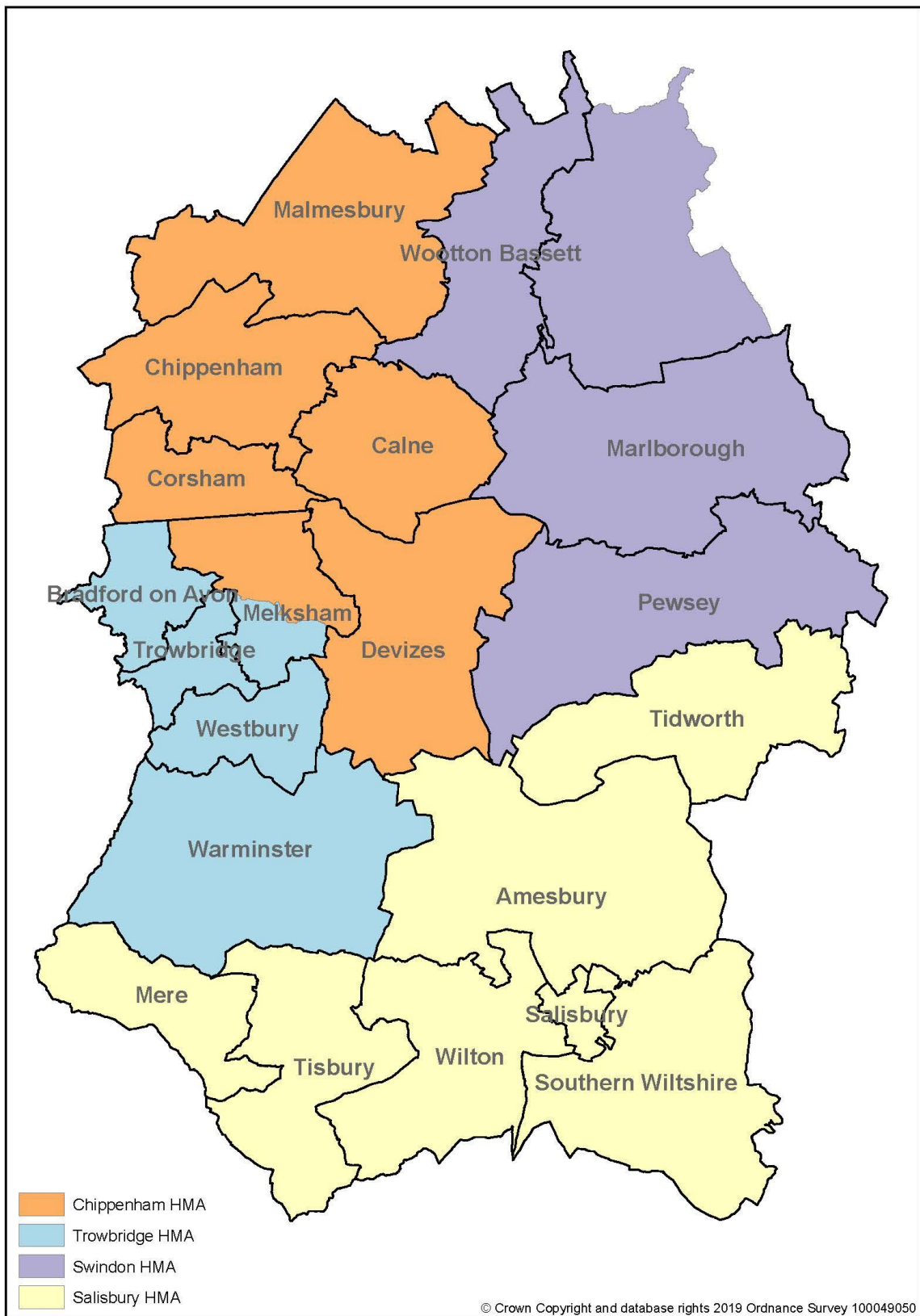
| Planning for Westbury (39 comments, 33 respondents) | |
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| Respondent Type | Main Issues Raised |
| Prescribed bodies including Town and Parish Councils | <p>Scale of growth</p> <ul style="list-style-type: none"> • Town Council considers that for the scale of growth to be sustainable, the following need to be addressed: <ul style="list-style-type: none"> - A350 congestion and air quality management - Sustainable transport and linkages - Town centre recovery and regeneration - Affordable housing delivery • Some support for less housing balanced with employment growth. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Town Council supports emphasis on infrastructure delivery, sustainable transport links and provision of open space. |

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| | <ul style="list-style-type: none"> • Town Council highlights need for bypass, railway crossing from Mane Way/ Oldfield Road and better pedestrian links. • Town Council generally supports protection of employment areas, particularly at West Wiltshire Trading Estate but considers that former Westbury Ironworks due to its location by the station could have a more flexible approach to allow for greater diversity of uses and higher density to support economy of town. • Town Council highlights need to protect heritage assets and landscape setting of town and improve range of facilities and services. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Town Council (with AECOM) identified those sites from the pool of sites they consider potentially suitable to progress <ul style="list-style-type: none"> - <i>Potentially Suitable:</i> Sites 4, 7, 8, 9, 10, 12 - <i>Not supported:</i> Sites 3, 5, 6 - <i>Not assessed:</i> Sites 1 and 2 (outside of Westbury Neighbourhood Plan boundary), and Site 11. • Town Council (with AECOM) considered that SHELAA sites 229, 3679 should be considered, and not excluded at stage 2. • Natural England objects to Site 6 because of unacceptable landscape impact. • Sport England objects to Site 11 (Land at Redland Lane) unless playing fields are replaced or surplus to requirements. • LaFarge Cement Works is identified as potential brownfield site, instead of greenfield. <p>Other</p> <ul style="list-style-type: none"> • Town Council supports brownfield target based upon previous years development; sees neighbourhood plan playing key role in delivery. • Town Council identify range of infrastructure alongside those identified in the consultation document. • Chapmanslade Parish Council highlight the impact of growth (past and present) on surrounding parishes, e.g. A3098 and Chapmanslade. • Westbury Leigh Primary School opposes more development to east of town, which has resulted in declining numbers for primary schools on the west. • Regeneration of town centre supported as priority, including improving air quality, range of shops and more housing. • Need for further employment questioned given existing areas and land. |
| Developer/agent | <p>Scale of growth</p> <ul style="list-style-type: none"> • Support higher level of growth at Westbury that could include additional housing required if plan period is extended. • Westbury is least constrained settlement in housing market area. |

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| | <ul style="list-style-type: none"> • Some question how the precise figure of 1,820 homes was derived (down from TR-B growth option figure of 2,920). <p>Place shaping priorities</p> <ul style="list-style-type: none"> • Priority 4 needs to be addressed with a transport strategy, outlining delivery, sustainable travel and identify site-specific measures. <p>Pool of sites</p> <ul style="list-style-type: none"> • Further site assessment should consider the more detailed site assessments undertaken on behalf of the Town Council for the neighbourhood plan and, also include more recent confirmation of site availability. • Sites 1,2,3,7 and 10 are being promoted. • Calls for five sites that have been rejected should be re-instated. • New sites were promoted: southwest of Petticoat Lane, Dilton Marsh; at the former Westbury Cement Works; and Titford Farm, Westbury. <p>Other</p> <ul style="list-style-type: none"> • Oppose bypass because of little evidence of need. Other strategies to reduce congestion and air quality may be more appropriate e.g., enhanced rail services. • Unconvinced of scale of education requirements in the town - Council's evidence shows a likely 17% drop in the proportion of under 14s by 2036. • Support for a more flexible approach to the future of the Hawke Ridge Employment Allocation if evidence shows little prospect of delivery. |
| General Public | <p>Scale of growth</p> <ul style="list-style-type: none"> • The scale of growth is too high, without commensurate level of infrastructure investment (e.g. schools, GPs/ dentists and transport, including a bypass) <p>Place shaping priorities</p> <ul style="list-style-type: none"> • Priority 4 is most important - the A350 is a major problem. <p>Pool of sites</p> <ul style="list-style-type: none"> • Site 6 had most objections. There were also objections to Site 7 because of landscape and biodiversity concerns, and Site 11 as an existing playing field. • Site 10 had most support because of its proximity to existing housing/ employment developments, good transport links and opportunity to realise bridge over railway. • Other sites received a mixed response, or some objections (i.e. 1, 2, 3, 8 and 9). |

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| | <p>Other</p> <ul style="list-style-type: none">• Most prevalent concern expressed is need for A350 bypass to combat traffic congestion, poor air quality and road safety.• Support for other transport improvements at Oldfield Road, a bridge over the railway off Mane Way and a shuttle bus between the railway station and town centre.• Improve town centre - challenges include traffic problems, range of shops and pedestrian safety.• Support for higher brownfield target and less, if any, further greenfield development• Support for better housing design, lower density, more open space, carbon neutrality and adequate parking provision• No demand for further employment provision, with Hawke Ridge remaining unbuilt and proposed housing near railway station likely to benefit commuters |
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APPENDIX 2: Housing Market Areas (HMAs), Wiltshire



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Wiltshire Council

Cabinet

29 June 2021

Subject: Housing Related Support

Cabinet Member: Cllr Jane Davies, Cabinet Member for Adult Social Care, SEND, Transition and Inclusion

Key Decision: Key

Executive Summary

1. This paper makes recommendations for Housing Related Support (HRS) delivered to residents in 130 sheltered sites within the county of Wiltshire, excluding Swindon.
2. HRS is a discretionary rather than statutory service. The service is delivered by Somerset Care and Cera Care (formerly Mears) and seeks to promote independence and delay the onset or need for more formal social care. The service model is now considered outdated against more effective models of independent living.
3. The HRS service dates back to 2003/4 under the Supporting People regime. Since Supporting People was disbanded in 2009 it was commissioned under a number of arrangements but was consolidated as a Help to Live at Home (HTLAH) service in 2013. The HTLAH contracts expired in 2018. Since then providers continue to operate the services.
4. In recommending a preferred option for the HRS service, the council has identified duplication of tasks with other services, and also considered the social care needs profiles of residents living across the 130 sheltered sites.
5. During November – December 2020 residents were consulted on how they use the service and the support they might need in the future. Findings showed that although some residents were at risk of social isolation, when that need was met, they were able to live independently. The consultation also demonstrated that there was considerable overlap in the HRS and the housing management provided by the Registered Social Landlords (RSLs).
6. HRS is not a needs-based service. Each resident in the 130 sheltered sites is able to opt-in to the service. At the time of this paper only 40% of eligible tenants use the HRS service. The service costs £957,987 per year, equivalent to £800 pa for each tenant currently using the service.
7. As a non-statutory service that is no longer fit for purpose and which duplicates other means of support, it is proposed that the HRS service is not

renewed. The majority of residents will be able to access the same type of provision from existing resources elsewhere via landlords, voluntary or mainstream community resources. The Council's transition plan will ensure that any residents who may have statutory eligible care needs, will have a care act assessment and appropriate support put in place.

8. The recommendation aligns with our early support and prevention strategy and strength-based approach to working with adults.

Proposal(s)

1. Cabinet is asked to agree the following recommendations:
2. To note the Council's preferred position of ending the contracted HRS service provided by Cera Care and Somerset Care on 31 March 2022 in line with the indicative timeline in paragraph 74 and liaise with landlords and providers to support residents through a transition phase to:
 - i. access alternate means of housing related support from other existing tenant support services
 - ii. ensure that residents receive appropriate information, advice and signposting as needed for any other identified support need to voluntary and community resources
 - iii. ensure that those with, or who may have, statutory eligible care needs, will have a care act assessment and appropriate support put in place.
3. That officers undertake a further consultation with residents on the Council's preferred position in line with the indicative timeline.
4. That the final decision on the future means of supporting HRS residents and any associated decisions is delegated to the Director Joint Commissioning in consultation with the Cabinet Member for Adult Social Care, SEND, Transition and Inclusion and the Corporate Director of People.

Reason for Proposal(s)

1. The current service requires review as outlined in paragraph 13.
2. HRS is a non-statutory service. The local authority does not have a duty to provide it. Residents can also access the same type of support from elsewhere within the community. There is duplication of elements of the HRS service with the tenant support service. The Registered Social Landlords (RSLs) are obligated to provide these elements.
3. Every resident will be supported to transition to alternate means of support, and those with, or who may have, eligible care needs will be identified and assessed by adult social care.
4. HRS services are not in line with a strength-based approach to care and support, and in its current format does not promote independence.

Terence Herbert
Chief Executive

29 June 2021

Subject: Housing Related Support

Cabinet Member: Cllr Jane Davies, Cabinet Member for Adult Social Care, SEND, Transition and Inclusion

Key Decision: Key

Purpose of Report

1. This report makes recommendations for the future of the housing related support (HRS) service. HRS is a non-statutory service, which is provided as an option only to sheltered housing residents across 130 schemes in Wiltshire. The types of support that residents receive is available elsewhere within the community.
2. The council consulted with residents using the service in late 2020. The consultation identified duplication between the HRS service's intended activity and the statutory support provided by tenants' landlords (the RSLs).
3. There is inequity between the landlords about who can access the service. The service was established to be available to sheltered housing tenants. However, some landlords recategorised some of their sheltered housing stock to general needs. Following this, the service has continued to be offered to those schemes as well as some other general needs schemes.
4. During the COVID pandemic, HRS providers have not provided the regular service. Typically, they have offered wellbeing phone calls and only visited schemes in the event of an emergency. It is timely to review the HRS service in line with the council's strategy for prevention and early intervention.

Relevance to the Council's Business Plan

5. This report aligns with the Business Plan 2017-27 priorities of 'protecting the most vulnerable' and 'Building stronger and more resilient communities'. The recommendations are also relevant to the key aims of:
 - Helping people to remain as independent as possible for longer
 - Getting the right help that people need, in the right place and at the right time

Background

6. HRS is a service designed to help ensure that a person living in a sheltered housing scheme can maintain their tenancy and live independently, where they need support to do so. The model is based on a person-centred approach and aims to facilitate reduced dependence upon statutory services.

7. The types of support someone receiving HRS might expect to receive relate to some of the following:

- Help to manage the safety and security of residential accommodation
- Help to maintain personal health and wellbeing
- Help to maintain financial wellbeing
- Help to develop life skills, such as cleaning, budgeting skills, cooking
- Signposting to other services for support, e.g. Universal Credit
- Advice or advocacy in relation to housing or tenancy matters

8. HRS is currently delivered by 2 providers (Cera Care and Somerset Care) at 130 sheltered housing schemes across Wiltshire. These schemes are split across 5 landlords, as follows:

9. Customers who live at these schemes are automatically eligible for the HRS service and do not have to meet any needs-based criteria. Customers choose to 'opt in' or 'opt out' of the service. This means that the service is choice-based, rather than needs-led. As the table below shows, at January 2021 approximately 40% of residents have 'opted-in' to receive the HRS support.

| Provider | Number of schemes | Number of customers 'opted in' | Number of customers 'opted out' | Total |
|---------------|-------------------|--------------------------------|---------------------------------|-------|
| Somerset Care | 34 | 289 | 339 | 628 |
| Cera Care | 96 | 908 | 1414 | 2322 |
| Total | 130 | 1197 | 1753 | 2950 |

Table One: Data provided by providers in January 2021

10. It has been identified that there is a lack of clarity around the number of customers who have chosen to opt out of the service. This is due to landlords recategorizing some of the schemes¹, from sheltered to general needs for over 55s; which has resulted in details of new residents not always being passed on to the providers by the landlord. For the purpose of this report, the number of opted out customers is representative of the number of customers not in receipt of a service.

11. To support the recommendations for the future of the HRS service, this report outlines the following:

- Contractual and funding arrangements
- Needs profile of HRS residents
- Duplication between landlord support and the HRS service
- Findings from 2020 resident consultation

Contractual and Funding Arrangements

12. The HRS service was originally commissioned with Somerset Care and Cera Care as part of the Help to Live at Home (HTLAH) contracts. The HRS service dates back to 2003/4 under the Supporting People regime. Since Supporting People

¹ Though these schemes remain part of the service

was disbanded in 2009 it was commissioned under a number of arrangements but was consolidated as a Help to Live at Home (HTLAH) service in 2013.

13. The current budget is £957,987. This equates to approximately £800 per customer who accesses the service.

Main Considerations

14. This paper's proposals are designed to ensure that the future means of supporting people with HRS type needs is fit for purpose and that all care and support needs are met in the most appropriate way. The proposals are therefore based on a thorough consideration of factors related to the current service as well as the broader strategic direction of social care. These include:

- equitable use of resources, effectiveness of the service, social care needs, social care need profile, strategic relevance and duplication with other services as well as the results of initial consultation with residents and ensuring a safe transition to other support is achieved.

Equitable use of resources

Current model is not needs-based and does not offer best value

15. Historically, the contracts with Somerset Care and Cera Care have been priced on the number of customers living at each scheme. However, only 40% of customers have opted in to receive the service, which has resulted in the council paying for higher volumes of service than has been delivered.
16. Somerset Care has confirmed that since March 2020 (England's first COVID lockdown) they have only been carrying out telephone calls to their HRS residents, although the service has been extended, so that even those residents who have 'opted out' have been called. Similarly, Cera Care have also been providing a telephone service since the same period in March 2020 and have only recently started to include an increasing number of visits.
17. For approximately 12 months HRS residents have been receiving a reduced service. No complaints have been received about the differing service offer, which indicates that the level of need for this type of service is not high, therefore, the contracted model could be seen as offering limited value to the customers.
18. One of the key aspects of the HRS service is ensuring that individuals can maintain their tenancy and live independently, with a reduced need for statutory services. The following areas have been analysed to provide a detailed picture of the support needs of the 'opted-in' HRS residents and how this has impacted on the requirement for statutory service support.

Effectiveness of current service and housing support need profile

19. Analysis of rent arrears data comparing sheltered tenants' rent arrears against people over 60 in general needs accommodation showed no evidence that the HRS service more effectively supports individuals to maintain their tenancies. Older people were typically seen to manage their tenancy well with low levels of arrears in both sheltered and general needs housing.

Social Care need profile

20. The table below shows that out of a capacity of 2950, 243 (8.2%) are in receipt of eligible care packages, following a Care Act Assessment. Across the 2 providers, 25.8% of all residents with social care packages have opted into the HRS services.

| Provider | Sites | Capacity | Opted in residents with care packages | Opted out residents with care package | Total |
|-----------|-------|-----------------|---------------------------------------|---------------------------------------|------------|
| Cera Care | 96 | 2322 (78.7%) | 53 (1.8%) | 119 (4%) | 172 (5.8%) |
| Somerset | 34 | 628 (21.3%) | 10 (0.3%) | 61 (2.1%) | 71 (2.4%) |
| Total | 130 | 2950 | 63 | 180 | 243 |

Table Two. Data source: Cera Care, Somerset Care, Wiltshire Council 2020

21. A desktop analysis of social care need within the services was undertaken (see Appendix Four). The data suggests low levels of need for social care, with 91.8% not in receipt of council funded care packages. Distribution of care packages between opted-in and opted-out is slightly greater in the opted-out cohort, though the opted-in residents have larger care packages. Therefore, there is limited evidence to suggest that the HRS service reduces reliance on formal support services.
22. The levels of residents with formal support packages are representative across each landlord, with 9% being the highest figure. The spread of support packages is evenly split across all five landlords. This tells us that an individual's need for formal care does not correlate to their landlord, suggesting that a tenant's need for social care is not affected by the support they receive from their landlord.

Strategic Relevance

Duplication of HRS Role with Housing Role and Discrepancy in Support

23. In mid-2020 discussions held with Wiltshire Council Housing concluded that the HRS was duplicating housing management support, which the landlord is legislated to provide. There was concern that the current provider-led activities could be creating a dependency culture and would achieve better outcomes if the activities were resident-led. This is something that the Council's Resident Engagement Officers could support for the council tenants.
24. HRS officers' job descriptions were compared against the typical tasks that each landlord's Neighbourhood Officer² (NO) / Housing Support Officer (HSO) performs as well as the tasks generally undertaken beyond the scope of the NO/HSO's contract. This information was then mapped accordingly, so that any duplications and gaps in provision could be identified.

² some landlords refer to their Neighbourhood Officer as a Housing Support Officer (HSO)

25. This exercise showed that there is duplication between all landlords and the providers regarding the housing management service. The only gap in provision is around liaison with a tenant's family and statutory services. Although there is an element of flexibility in the landlords' service, if there is an emergency.
26. As noted above in the 'purpose' section, there is discrepancy in the type of support provided by each of the RSLs. The responses from the consultations have been analysed per landlord, to understand how the intensity of landlord support may impact upon a resident's use of the HRS service. Further detail on this is set out below and in Appendix One.

Similar Services Elsewhere within the Community

27. A desktop review has shown that within Wiltshire, there are several organisations who offer help and support to people in a similar fashion to the support provided by the HRS officers e.g. Citizen's Advice, WCIL, Silver Line.
28. There is a strong universal service offer available for our sheltered communities via the voluntary sector, that could address key support domains currently delivered through housing related support:
- Financial wellbeing
 - Health and wellbeing
 - Emotional wellbeing
 - Meaningful use of time
 - Social isolation
29. There are additional benefits derived by supporting sheltered residents via the community rather than via commissioned services, in that it helps to build stronger communities, allowing residents to be more involved in their locality as well as the potential to mobilise sheltered accommodation assets to support the community.
30. Despite HRS services not being statutory, there has been a long history of support being offered to those residents based on their choice to accept the support. This may have led to some residents becoming both used to and dependent on this support for some of their social interaction. However, during the COVID lockdown that support has largely moved online/via the phone without any complaints from the residents.
31. There is scope to meet identified needs of the residents by building better bridges within the community and the wider voluntary sector. This can be effectively facilitated during the transition and ending of the existing services.

Consultation Results

32. A full analysis report detailing the responses to the HRS consultation can be found at Appendix One, along with the questionnaire provided to residents, listed in Appendix Two. The consultation ran from 11 November 2020 to 4 December 2020 and received a 60% response rate.

33. The key themes highlighted from the consultation's responses were that many HRS residents feel lonely and use the HRS service to reduce their social isolation, although it should be noted that this consultation took place during England's second national COVID lockdown.

34. Significantly, the consultation provided further evidence that the HRS role and RSL role are duplicated; as many respondents reported being confused at the difference between the HRS worker and their HSO.

35. The consultation has shown that the social care needs profile of residents is no greater than in the wider community. This has been identified through the analysis of residents' social care packages and supplemented through the consultation's results, as detailed in Appendix One.

36. The key headlines from the consultation are that:

- 65% of people report not needing help with the types of things HRS offers such as: managing tenancy and living arrangements; managing money; feeling safe at home
- The service's value for some is supporting emotional wellbeing or reducing loneliness
- 60% of respondents report receiving support from family and friends
- With social isolation and loneliness needs met, most felt able to live independently at home, for example:
 - *62% of respondents value either the support for their 'emotional wellbeing' or that the HRS service ensures that they do not feel lonely*
 - *Of the 169 people who selected valuing the HRS service for an 'other' reason, 40% said because it gives them the opportunity to talk to someone. A number of these people provided handwritten comments that their Housing Support Officer or their HRS worker is the only contact they may have all week.*
 - *68% of respondents use the service either once a week or more than once a week*
 - *83% of respondents said that they see their HRS worker for between 1-30 minutes*

37. Residents on thinking about future independence:

- 31% reported needing an emergency alarm call system
- 25% stated greater access to advice & information would help them be more independent
- If the HRS service was removed, residents would still have access to HRS-type support to maintain their tenancies (overlap with landlords' housing management function).
- The more developed a landlord's offer, the lower the requirement for HRS to meet support needs among those opting into the service was identified. All landlords have tenant support services, which offers very similar support to HRS. Selwood has the lowest landlord support offer and the greater reliance on HRS.

Transition process

38. Residents with eligible care needs are supported through commissioned care or direct payments. Three times as many people with eligible care needs opt-out of the service as opt-in. This suggests that the HRS service is not playing an integral role in people's ability to live independently with appropriate support and many are able to do so without accessing the HRS service.
39. The level of support currently on offer to those residents who have opted-in would not meet the threshold of support that would meet eligible social care need. Therefore, there will be no need to provide a full care act assessment for those residents impacted by the proposal. However, those residents with current care packages, who are currently receiving an HRS service, will have those packages reviewed by Operational teams, as part of their normal review process. Those reviews will consider the impact of the proposal on those residents and their current care packages.
40. During the transition phase (see the timeline listed below), those residents who might require additional support will be identified by the provider or by residents who identify themselves as requiring additional support. Advice and Contact will be able to have a strength-based conversation with those residents, who might meet the threshold for social care, to identify community-based support, family and friends, commissioned universal services or voluntary sector organisations. Commissioning will play a role in identifying capacity and coordinating a community-based response, alongside Community Engagement Managers and landlords.

Overview and Scrutiny Engagement

41. The Chairman and Vice-Chairman of the Health Select Committee were briefed on the proposals on 16th June 2021. The members note the preferred position of the Council in respect of the HRS service, as provided by Cera Care and Somerset Care. Of particular interest was the transitional plan arrangements and the proposals to ensure that appropriate support was available for service users with eligible needs beyond 31 March 2022. In response, the Health Select Committee intends to include the report within its agenda for 6 July, 2021 and an invite will be extended to the Cabinet Member to attend.

Safeguarding Implications

42. The HRS service provision has been shown to be duplicated through the statutory duties of the RSLs and support provided by the VCS. Therefore, the proposal to end the HRS in its current format would not lead to any individual who currently accesses the HRS without any form of provision.
43. Landlords and the service providers have been briefed that the council's intention is to review the HRS service and consider alternative ways of best meeting residents' needs.
44. Commissioning will work with Adult Social Care to ensure that residents with potential social care needs will have those social care needs assessed and met.

45. The RSLs have a duty to uphold necessary safeguarding practises for their residents and therefore, the proposal to decommission the HRS is not deemed to result in any safeguarding implications for residents.

Public Health Implications

46. There are concerns that HRS is creating dependencies among residents who use the service, which contradicts the council's public health strategy for prevention. Additionally, the service in its current format is contributing to health inequalities, because the provision is not accessible to all general needs sheltered housing tenants.

47. Population data ([Wiltshire Intelligence](#), 2017) demonstrates that social isolation is an issue that affects older people being able to manage their needs at home and certain areas of Wiltshire fare worse in this regard. The review of the HRS service is necessary to help ensure that any future provision is equally accessible, regardless of tenure.

48. If the proposal to end the current service is implemented, this would create stronger and more resilient communities, with individuals being empowered to take responsibility for their own wellbeing. Individuals will be accessing support from within the community, thereby ensuring that they are less isolated and better connected, which contributes to overall population health improvement.

Procurement Implications

49. As the proposal is to allow the service to expire, there are no procurement implications.

Equalities Impact of the Proposal

50. An initial EQIA risk assessment has been undertaken on the proposal and has identified that those individuals with housing related support needs could have their needs met through other agencies.

51. There are potential negative impacts, or certainly the perception of negative impacts, for residents who use the service and who have limited social contact and experience loneliness. However, the potential to counteract these impacts is being considered through development of the council's consultation plan. The following options are currently being explored:

- Support from Community Engagement Managers to help vulnerable people access provision from the Voluntary and Community Sector (VCS)
- Advice and Contact to have strength-based conversations, to identify alternative universal service offers to meet social isolation needs
- Working with the providers (Cera Care and Somerset Care) to identify those residents who would benefit from Care Act Assessments and to liaise with ongoing support social work teams to undertake them.
- Working with the Cera Care and Somerset Care to identify those residents who would benefit from accessing support from other agencies

52. These proposals promote fairness in that there is currently inequitable access to the current HRS service, as it is based on tenure rather than need. Therefore, the current service is not accessible to all. The proposal to remove the service and focus future support on more preventative strength based ways of meeting needs, that can be met in the wider community, would result in a positive impact and improved equity of resources, based on age, gender, disability or other protected characteristic.

53. It is noted that due to longstanding familiarity and access to the current HRS service, existing residents would need to be supported to adjust to how the new model continues to meet their needs. New referrals into the sheltered schemes will simply experience the new service model on its own merits with clear expectations.

Environmental and Climate Change Considerations

54. The tender evaluation criteria and contract terms and conditions include provision on environmental and climate change impact, to ensure this is appropriately considered.

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

55. If the HRS service is not reviewed, the council will continue paying for a service based on choice, rather than need; as there is inequity of provision based on tenure, not reviewing the service is likely to entrench health inequalities.

56. The council will not meet its objectives as set out in the Business Plan 2017-27, because the service has been shown to encourage dependencies and activities are duplicated by statutory provision, which does not represent an efficient use of public money.

57. The Council needs to ensure that it is acting in line with its Constitution and Public Contract Regulations 2015 (PCR). Therefore, the Council should undertake reviews and assess its options to ensure compliance of the above which in turn will reduce any risk of challenge.

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

58. Some residents who have become dependent on the HRS service may feel concerned that the provision has been taken away from them. However, the council will develop a communications plan in collaboration with providers and landlords, to help allay any anxieties and reassure residents of where they can continue to access support and that there are not expected to be any gaps in provision.

59. Residents were contacted in April 2021 and informed of the outcome of the consultation and again in June, updating on this Cabinet report and the options that were being put forward. Only one resident got in touch following the April letter, advising that they did not understand what the HRS service is, yet value their Housing Support Officer.

60. Following on from this Cabinet decision, residents will be further consulted on the Council's proposals, and following that work will commence to ensure that those with eligible needs are identified and appropriate care and support put in place. Alongside this, work will progress between the landlords, providers and VCS in helping residents to access help and support, if needed.

Financial Implications

61. The current service costs £957,987 per annum, which equates to about £800 per customer supported.

62. The proposed closure of this non-statutory services is designed to remove duplication from the system and ensure residents' needs are met by the most appropriate means. This report's proposals therefore are not savings driven. However, there is a potential financial dividend established from the transition to more effective means of care and support.

63. While, it is hoped that residents' needs can be appropriately met through existing tenant support, voluntary and community resources, it is possible that as the service has in practice veered away from its intended purpose, current delivery may mask an element of low level demand that is more appropriately and effectively met through commissioned services. The transition plan (see indicative timeline in paragraph 74) allows for this.

64. It is not possible therefore to state with certainty the costs associated with meeting potential new or increased care need further to these proposals. However, the following projections can be made:

- If 400 residents did not require any formal care service, then there would be an annual recurring saving of (400 X £800) £320,000
- If 600 of residents (50% of those currently using the service) did not require any formal care service, then there would be an annual recurring saving of (600 X £800) £480,000
- If 800 residents did not require any formal care service, then there would be an annual recurring saving of (800 X £800) £640,000

65. Importantly, if the proposal to terminate the service is agreed, then a natural reduction in the number of customers being supported could be agreed i.e.: no new customers would be added to this service in the remainder of 2021/22. This could lead to a gradual reduction in the resources required to support the service during this period but would require negotiation with the providers.

Legal Implications

66. Legal advice was sought during the development of this proposal and was advised that, although HRS is not a statutory service, it would be advisable to consult again with the residents. This was because the service has been delivered for a considerable length of time and receivers of the service may now rely on the service being available therefore, as a matter of fairness a consultation would be advisable and prevent the council being challenged. As stated above, an initial consultation has been carried out.

Workforce Implications

67. The proposal is for the HRS service to be terminated. However, as the service employs staff, advice from the council's Human Resources team is that the council should assume that TUPE applies and should be considered as part of the proposal. In the options listed below, Option A is the only one where any TUPE implications would apply.
68. Despite Option A not being the recommended option, if it is implemented, there is the potential for the service to be restructured to best meet needs. This could result in redundancy costs if there is a surplus of staff. The TUPE regulations do permit changes to the workforce post service transfer for an Economic, Technical or Organisational reason. The risk of redundancy costs associated with Option A is low.
69. TUPE provisions in the provider contracts are uniform and allocate liability to the provider. The legal view is that a proposal to terminate the service would not generate a redundancy liability for the council.
70. Wiltshire Pension Fund (WPF) advises that Cera Care has a pension surplus of £763k from strong investment returns during their staff's time in the fund. Somerset Care's contracts are silent on cost/risk sharing. WPF identifies them as having a £560k surplus. As surpluses are large, both providers are unlikely to accrue a deficit in the near future. The cost of paying any surplus falls to WPF, not the council.

Options Considered

71. Option A: No change / tender for a like-for-like service model

| Option A | |
|--|--|
| Benefits | Drawbacks |
| <ul style="list-style-type: none"> ➤ Promotes continuity ➤ Likely to be more favoured with the residents ➤ Avoids reputational risk to the council due to negative media coverage ➤ Tender process enables the market to be tested for best value ➤ First stage consultation shows that resident's value the social interaction | <ul style="list-style-type: none"> ➤ Current service is being duplicated by the RSLs ➤ Current service creates dependence and is not in line with the prevention strategy ➤ First stage consultation shows limited use or need for the current services ➤ Current service provision exists elsewhere with the community ➤ Inequity of service, for those Wiltshire residents who do not live in sheltered accommodation |
| Further consideration | |
| <ul style="list-style-type: none"> ➤ If the council was to fund a new like for like service, then the funding would have to be diverted from another service area. ➤ Diverting funding from a more accessible service would be a negative impact on the wider community. | |

72. Option B (recommended option) - End the service and work with ASC operations and key stakeholders during a transition phase (from 09.07.2021-01.03.2022 as detailed in the timetable below), to ensure that future needs are met after the current service ends. Cera Care and Somerset Care would continue to deliver the HRS during this period.

| Option B | |
|---|--|
| Benefits | Drawbacks |
| <ul style="list-style-type: none"> ➤ Support, and funding for support, will be targeted based on need rather than postcode, this will be more equitable than the current system ➤ By funding only those that need a service, costs will be reduced ➤ By combining this approach with effective signposting to RSLs and VCS, the costs of preventative support will be shared across the sector | <ul style="list-style-type: none"> ➤ This may be seen as service cuts generate negative publicity for the Council ➤ First stage consultation showed that some residents valued the social interaction from the service ➤ Might see an increase in some social care packages ➤ Might see an increase in some of the landlords' eligible service charges for the residents |
| Further consideration | |
| <ul style="list-style-type: none"> ➤ Though this option might not address all the concerns and needs, it is a pragmatic solution to a complex problem. ➤ Most of the concerns can be addressed and mitigated by careful planning with the support from colleagues in adult social care and those voluntary organisations who serve the local community that these schemes are part of. ➤ This option provides the best opportunities to build more cohesive communities between sheltered residents and their neighbours with improved access to community assets for all residents. ➤ This opportunity provides greatest opportunity to ensure use of Council Funding is used to support our strategic objectives for early help and prevention. | |

73. Option C - End the service and signpost people to alternative provision e.g. RSLs or VCS

| Option C | |
|--|--|
| Benefits | Drawbacks |
| <ul style="list-style-type: none"> ➤ Discontinuing an out of date model that was not delivering the required outcomes or best value ➤ Support, and funding for support, will be targeted based on need rather than postcode, this will be more equitable than the current system | <ul style="list-style-type: none"> ➤ Lack of targeted and coordinated support ➤ Social Care needs might be missed ➤ More likely to be deemed as a cost cutting exercise ➤ Increased risk of challenge from landlords and residents ➤ Less consistent with residents' stated preferences |

| | |
|--|--|
| <ul style="list-style-type: none"> ➤ By funding only those that need a service, costs will be reduced ➤ Effective signposting to RSLs and VCS, the costs of preventative support will be shared across the sector | <ul style="list-style-type: none"> ➤ Less in keeping with the council's own policy direction ➤ Most disruptive to residents that would leave some with unmet needs |
| Further consideration | |
| <ul style="list-style-type: none"> ➤ Customers in this group tend to require support across a range of needs for example life skills, budgeting, neighbour relationships/behaviour issues and sometimes over an extended period of time. ➤ RSLs tend to only offer very specific time limited intervention around tenancy sustainment and expect that this is only short term. ➤ VCS services do not generally provide such a wide range of services, for a longer-term duration. ➤ Shortfall of provision will impact on Adult Social Care because it may accelerate or increase the need for commissioned packages of care. ➤ This is not aligned to the Council's early support and prevention strategy. | |

Indicative Timeline

74. The indicative timeline is as follows:

| Stage | Date(s) |
|---|------------------------|
| ➤ Cabinet Decision | 29.06.21 |
| <ul style="list-style-type: none"> ➤ Consultation with residents on council's preferred option ➤ Engagement with providers ➤ Identify residents with care and support needs who may need to access support from other agencies | 09.07.21 – 06.09.21 |
| ➤ Analysis of consultation results from provider and resident feedback concluded | 17.09.21 |
| ➤ Delegated decision | 22.10.21 |
| <ul style="list-style-type: none"> ➤ Formal notice to providers ➤ Notification to residents | 29.10.21 |
| ➤ Transition & TUPE arrangement with current providers | 1.11.21 - 1.02.22 |
| ➤ Care package reviews (council operational teams) | 1.11.21 – 1.03.22 |
| ➤ Mobilise Voluntary Sector & adult care support | 1.11.21 – 1.12.21 |
| ➤ Review sheltered portfolio and housing management (landlords) | 1.11.21 – 1.02.22 |
| ➤ Transition/handover of services | 1.11.21 - 1.03.22 |
| ➤ Transition of support functions & signposting | 1.11.21 - 1.03.22 |
| ➤ Service Expires / Transition complete | 31.03.22 |

Conclusions

75. Cabinet is asked to agree the following recommendations:

76. To note the Council's preferred position of ending the contracted HRS service provided by Cera Care and Somerset Care on 31 March 2022 in line with the indicative timeline in paragraph 74 and liaise with landlords and providers to support residents through a transition phase to:

- I. access alternate means of housing related support from other existing tenant support services
- II. ensure that residents receive appropriate information, advice and signposting as needed for any other identified support need to voluntary and community resources
- III. ensure that those with, or who may have, statutory eligible care needs, will have a care act assessment and appropriate support put in place.

77. That officers undertake a further consultation with residents on the Council's preferred position in line with the indicative timeline.

78. That the final decision on the future means of supporting HRS residents and any associated decisions is delegated to the Director Joint Commissioning in consultation with the Cabinet Member for Adult Social Care, SEND, Transition and Inclusion and the Corporate Director of People.

Helen Jones, Director of Commissioning

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Appendices –

Appendix One – Analysis of 2020 HRS Consultation Results

Appendix Two - 2020 HRS Consultation Questions

Appendix Three – Map of HRS Schemes in Wiltshire

Appendix Four – Social Care Needs Profile of HRS Residents

Background Papers – None

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Appendix One

Results of the Housing Related Support (HRS) Survey

Section A

Executive Summary

With a 60% response rate, the HRS consultation's results are regarded as representative of those who use the service. The key theme that has been highlighted is that most respondents value the HRS service because it reduces their social isolation and many left personal comments on the survey that they often felt lonely.

The support residents require is regarded as low. This is because most respondents reported using the service for up to 30 minutes once per week, predominantly to support their emotional wellbeing. A significant proportion of respondents reported receiving help from a family member, friend or carer.

There was some confusion among residents between the role of an HRS worker and a Housing Support Officer, this evidences the fact that the HRS service is duplicated through the provision afforded from the RSLs.

Background

Housing-Related Support Services (HRS) are provided to help vulnerable people develop or maintain the skills and confidence necessary to live as independently as possible. A core principle of HRS is the prevention of homelessness and preventing, reducing or delaying the need for social care provision.

HRS services would normally cover a wide range of activities such as assistance with:

- life skills
- budgeting
- maintaining a tenancy
- providing advice and support to arrange a repair
- helping people to understand the consequences of their actions, for example the impact of their relationships with their immediate neighbours and wider community

Customers who live at 130 sheltered housing schemes across Wiltshire are automatically eligible for the HRS service and do not have to meet any needs-based criteria. Customers therefore choose to 'opt in' or 'opt out', which results in the service being choice based, rather than needs led. Cera Care are commissioned to deliver the HRS services at 96 schemes, with Somerset Care delivering the services at 34 schemes.

The survey ran from 11 November 2020 to 4 December 2020 and was delivered by hand to residents who had opted-in to receive the HRS service in their sheltered

housing scheme. Wiltshire Council delivered the surveys to the two providers' offices (Cera Care & Somerset Care), with providers subsequently distributing the surveys to the correct households.

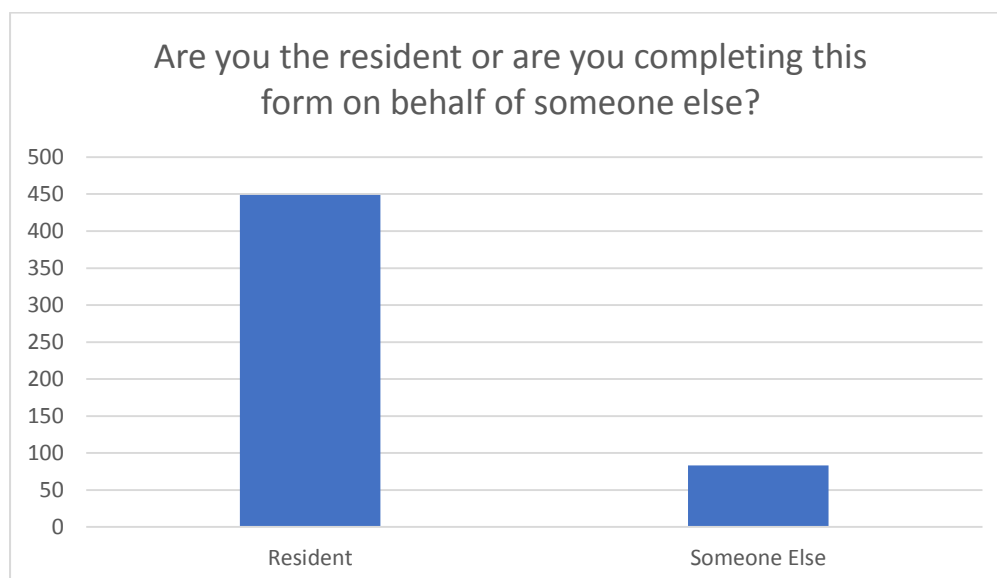
By 17 November 2020, the providers had confirmed that all appropriate households had received a copy of the HRS consultation. Within the survey, a business reply envelope was provided for the individual to send their completed survey back to Wiltshire Council.

Wiltshire Centre for Independent Living (WCIL) offered assistance if an individual wanted to respond to the survey via telephone, or if someone needed help understanding a question and how to respond. WCIL completed a total of eight HRS responses over the telephone with residents.

Results

In total 1038 HRS surveys were delivered to residents. 622 of these were completed, which gives a response rate of approximately 60%. It is important to note that whilst 622 surveys were received (either by Wiltshire Council or WCIL), some respondents chose not to answer every question, or provided multiple responses where this is appropriate; for example [for Q4](#), 'what support do you value most from the HRS service?'

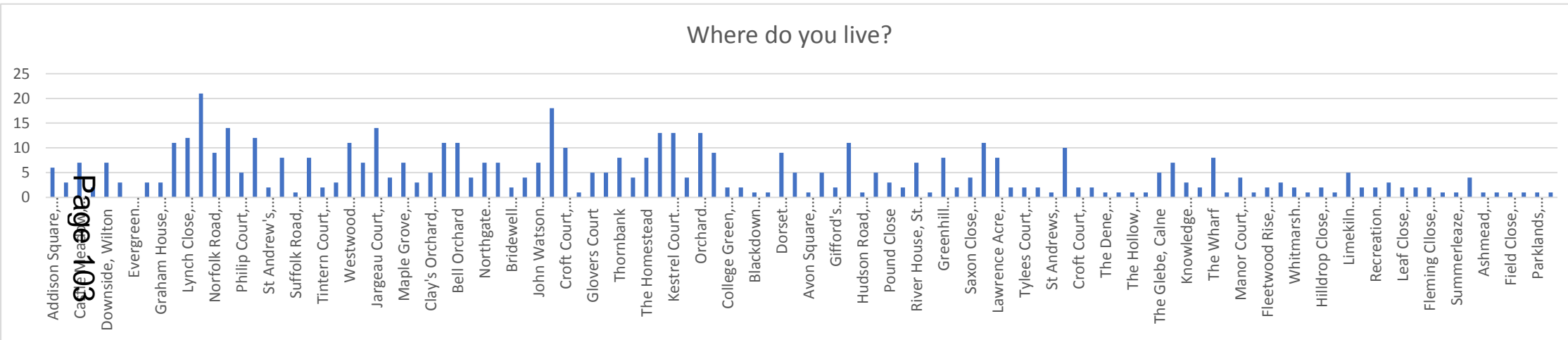
Q1: Are you the resident or are you completing this form on behalf of someone else?



A significant majority of respondents were residents. For those that ticked that they were responding to the survey on behalf of someone else, this was largely family members and in a small number of cases, the HRS worker completed the survey with the resident. In total, 3% of all completed surveys have been tracked to an HRS worker.

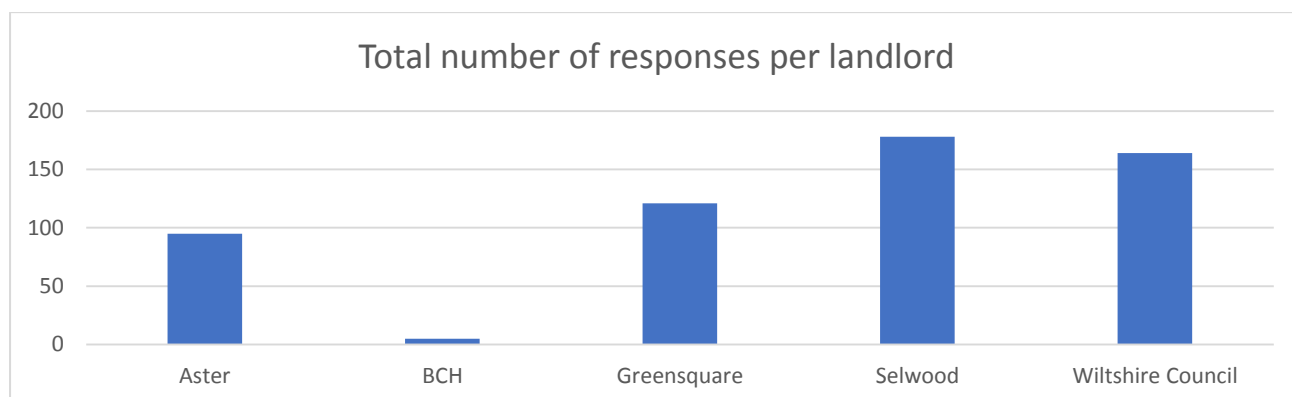
WCIL also completed eight surveys with individuals, these were classed as responses from 'the resident', as WCIL merely acted as the intermediary and were listed on the survey (see Appendix Two) as being able to facilitate telephone responses for residents.

Q2: Where do you live? (name of sheltered housing scheme)



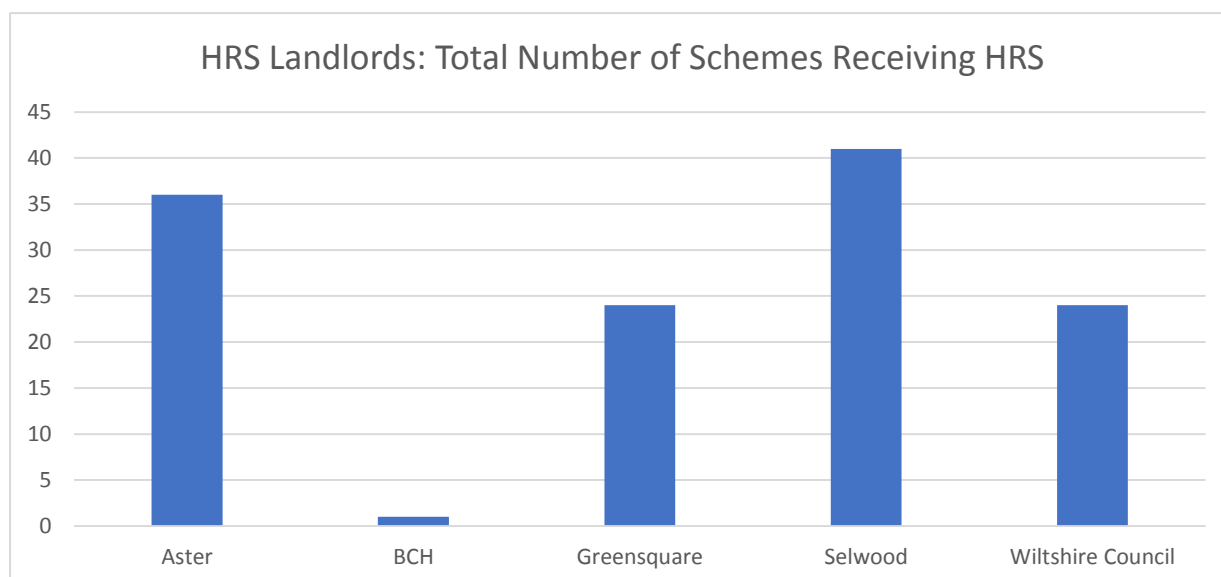
48 residents chose not to list their address when completing the survey.

Responses per Landlord



Selwood & Wiltshire Council are the landlords whose residents responded most to the HRS consultation. The proportion of responses per landlord does not correlate to the number of properties per landlord.

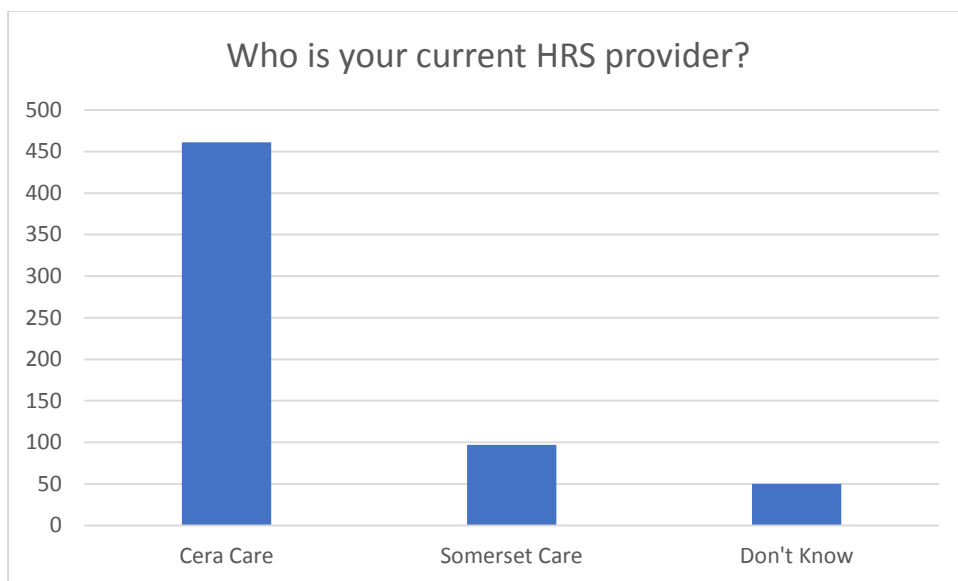
Schemes Per Landlord



Selwood have the most HRS schemes, followed by Aster. Yet, this is not reflected in the number of responses, with Selwood and Wiltshire Council receiving the most responses.

This could be explained by the fact that non-Wiltshire Council residents may not have understood how the consultation applies to them: if a resident has a different landlord to Wiltshire Council and receives HRS from either Cera Care or Somerset Care, they may not understand the role that the Council plays in the commissioning of HRS to these two providers.

Q3: Who is your current HRS provider?



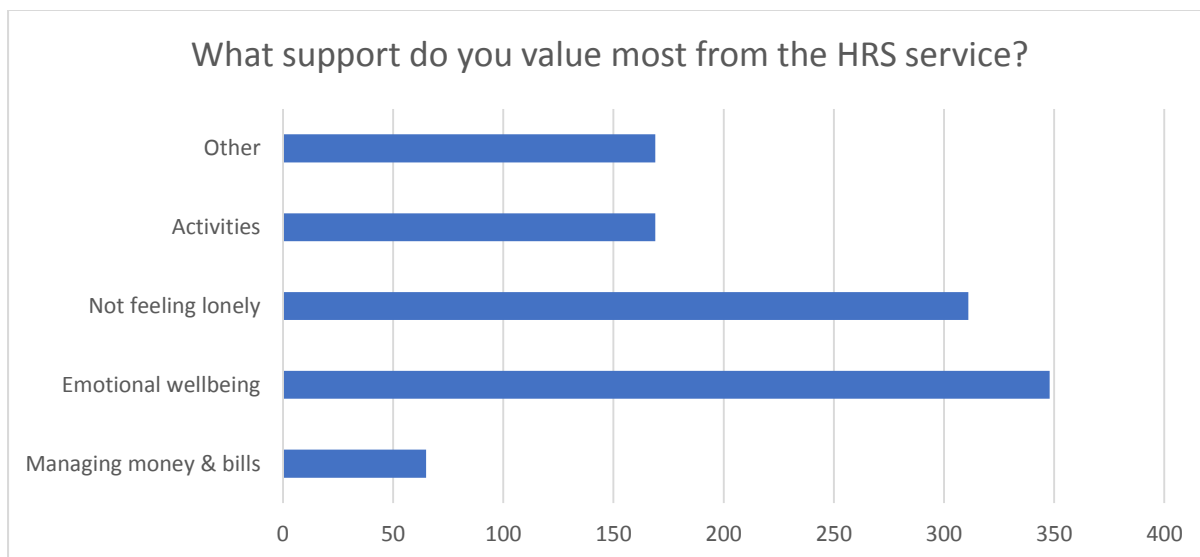
Of the residents who answered this question, 76% receive HRS from Cera Care, with 16% receiving HRS from Somerset Care.

Overall:

- 70% of households receive HRS support from Cera Care
- 30% of households receive HRS support from Somerset Care

Therefore, the amount of resident responses to this question is broadly proportionate to the percentage of residents that each provider supports.

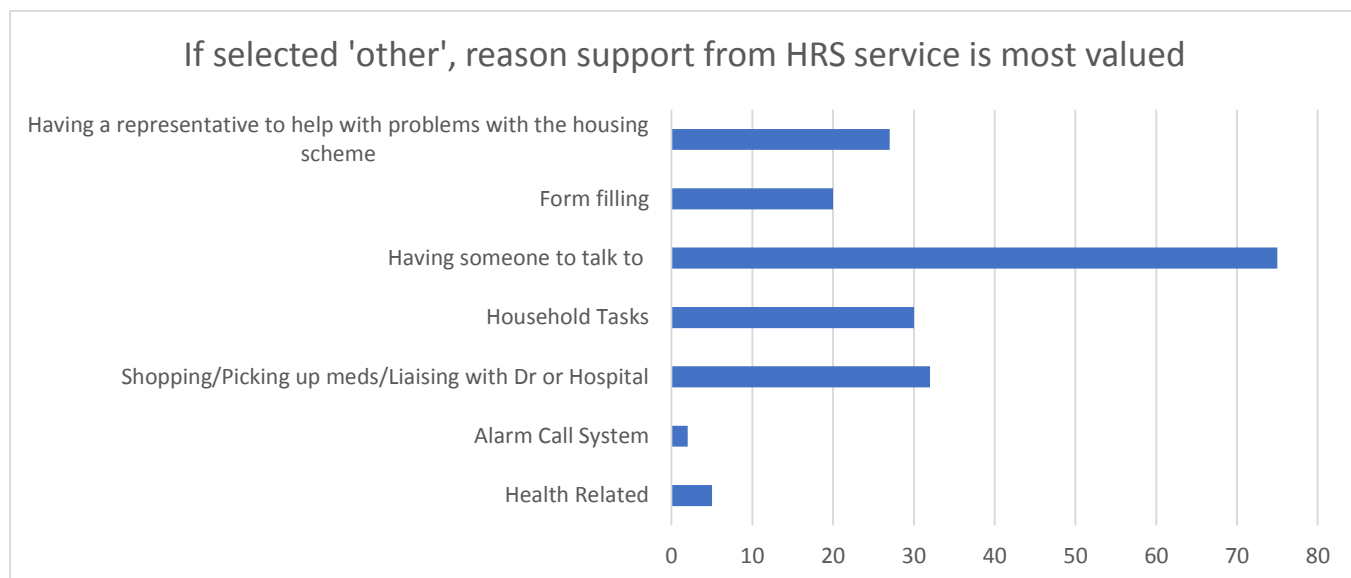
Q4: What support do you value most from the HRS service?



62% of respondents value either the support for their 'emotional wellbeing' or that the HRS service ensures that they do not feel lonely.

As a result of the COVID pandemic, HRS activities have not been taking place since March 2020. For those who selected 'activities', many commented that they had been missing the social interaction that came with this support offer.

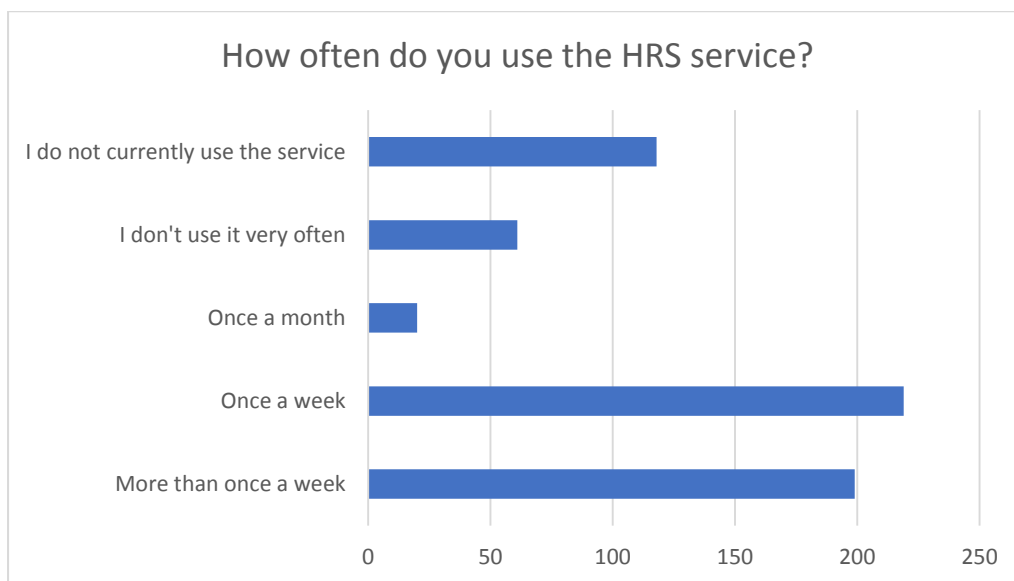
The third most popular support from the HRS service was defined as 'other' and these reasons are set out in the below graph:



40% value the HRS service because it gives them the opportunity to talk to someone. A number of respondents detailed that they feel lonely and either their Housing Support Officer or their HRS worker is the only contact they may have all week.

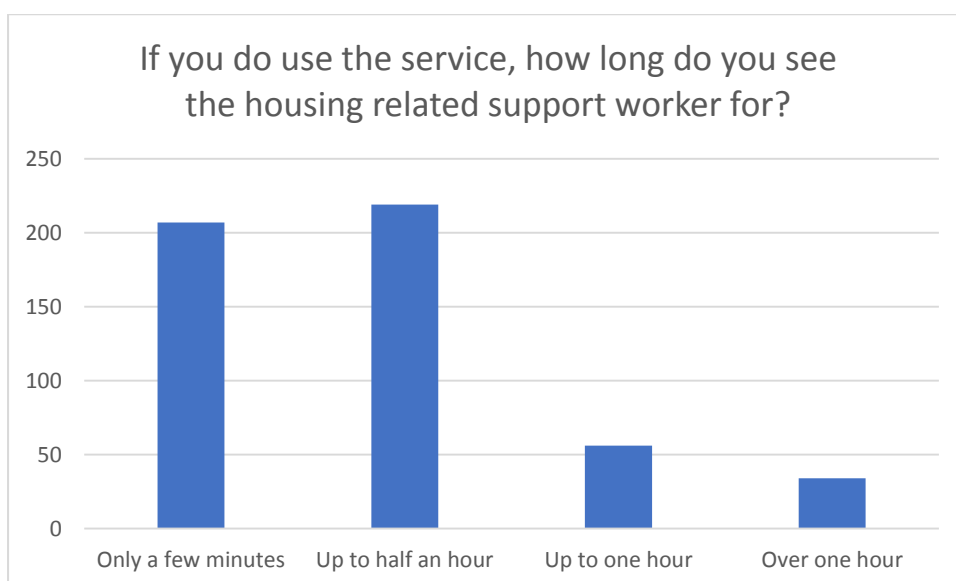
Picking up shopping and medication, as well as liaising with healthcare professionals was most valued by 17% of residents. 16% most value 'household tasks', which relates to laundry, cleaning and sorting mail.

Q5: How often do you use the HRS service? (please choose the closest option which describes your situation)



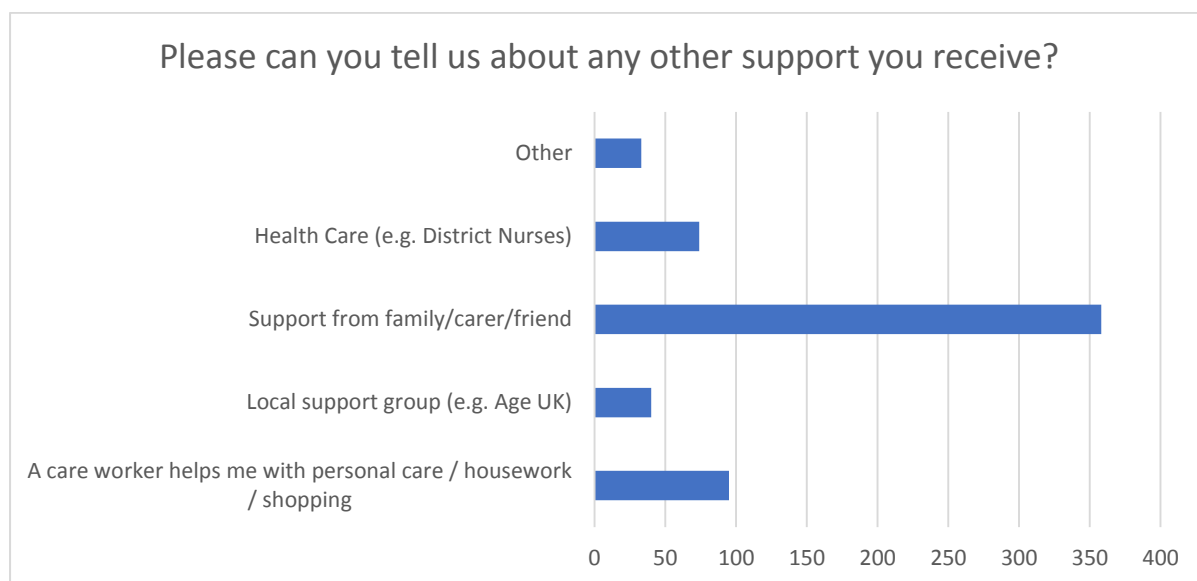
68% said that they use the HRS service once a week or more than once a week. 19% of people said that they do not use the service.

Q6 – If you do use the service, how long do you see the housing related support worker for?



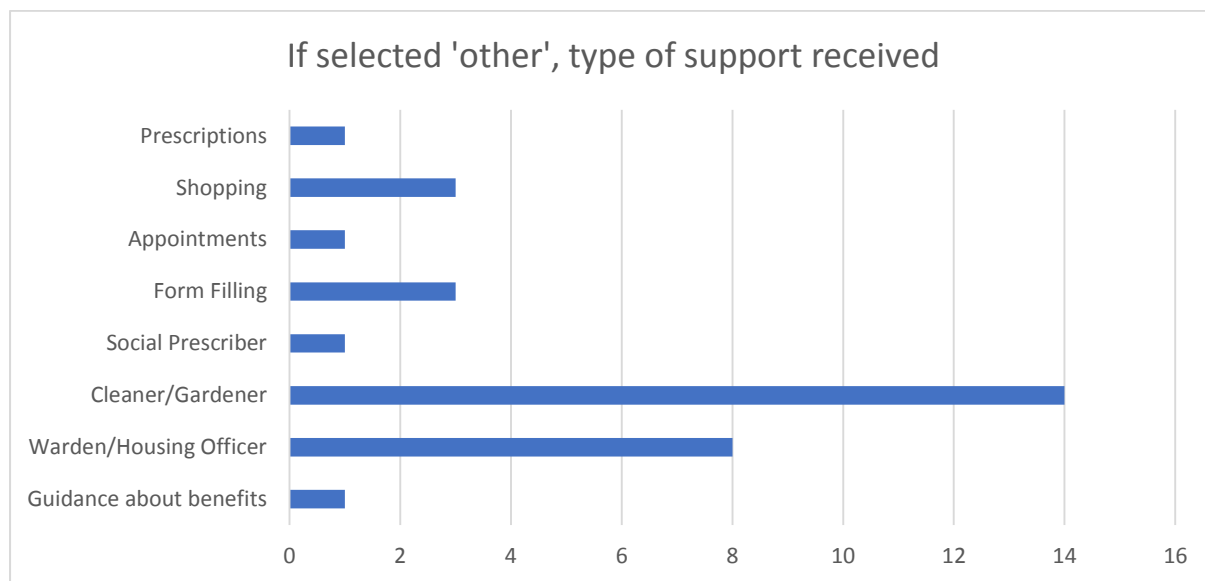
83% of respondents said that they see their HRS worker for under 30 minutes or for only a few minutes. Comparing this response with the one for [Q5 above](#), we can see that most residents need support “little and often”.

Q7: Please can you tell us about any other support you receive?



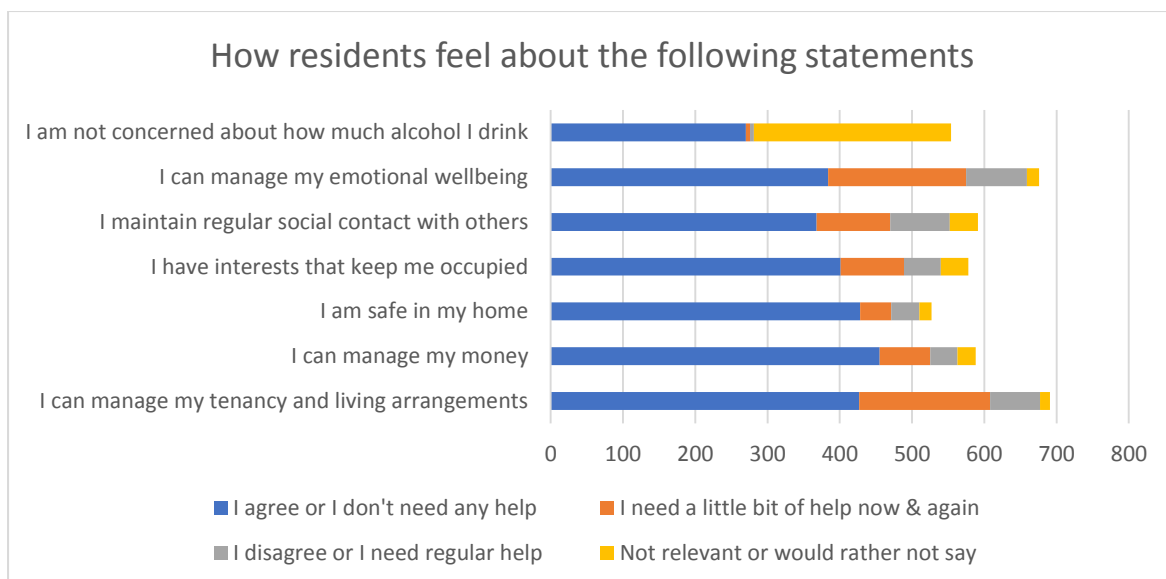
60% of respondents receive additional support from either a family member/carer or friend.

For those who selected 'other', the additional support they receive has been grouped by theme and is set out in the graph below:



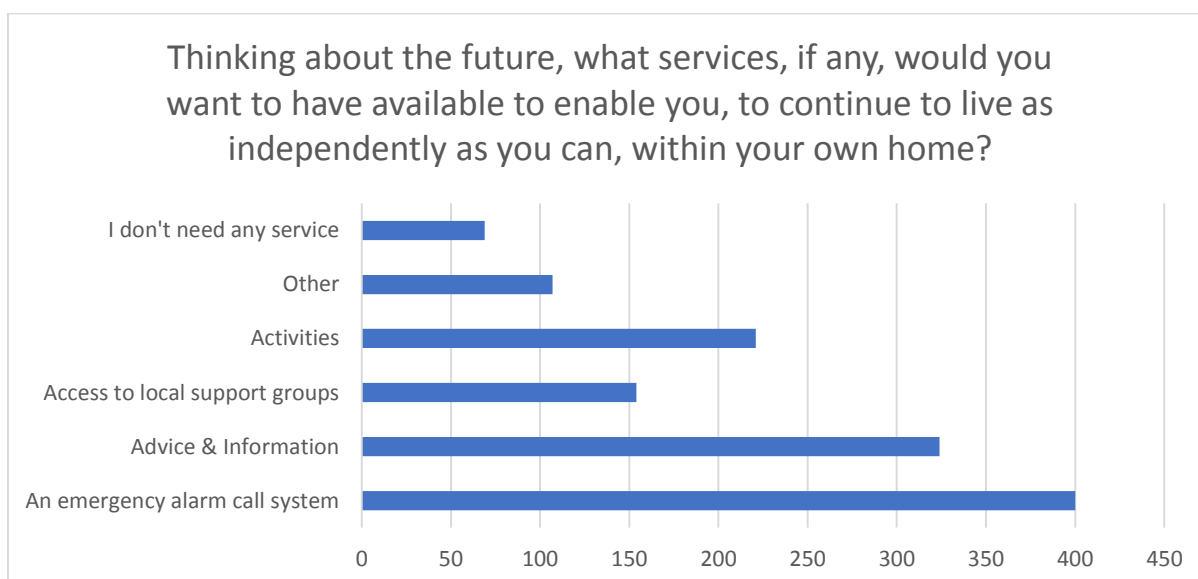
44% of people have a private gardener or cleaner as a form of additional support. 25% stated their warden or Housing Support Officer as additional support. It is worth considering here that there appeared to be confusion among residents about the difference between their HRS worker and their Housing Support Officer.

Q8 – the statements below relate to the kind of things that HRS supports people with. Please tell us whether you agree with the following statements



65% of residents reported that they do not need any help with the support that the HRS service provides. Some residents noted that whilst they do not need help with these aspects of their lives now, this is because of the current support arrangements they have in place.

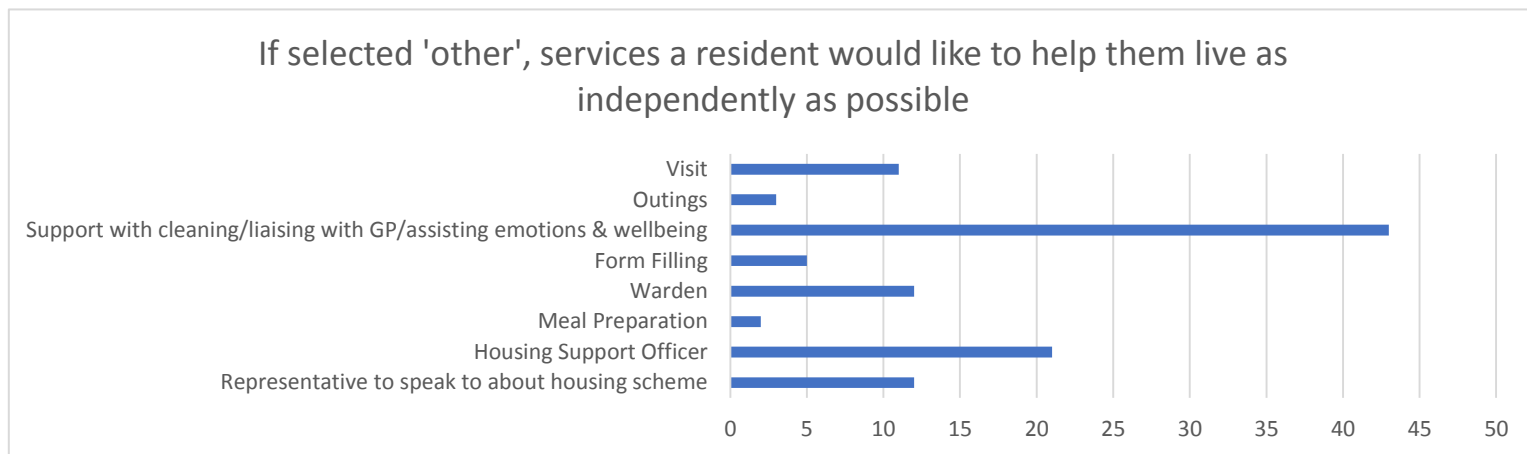
Q9: Thinking about the future, what services, if any, would you want to have available to enable you, to continue to live as independently as you can, within your own home?



31% of people reported needing an emergency alarm to help them live most independently in their own home, with 25% stating that access to advice and information was important to them.

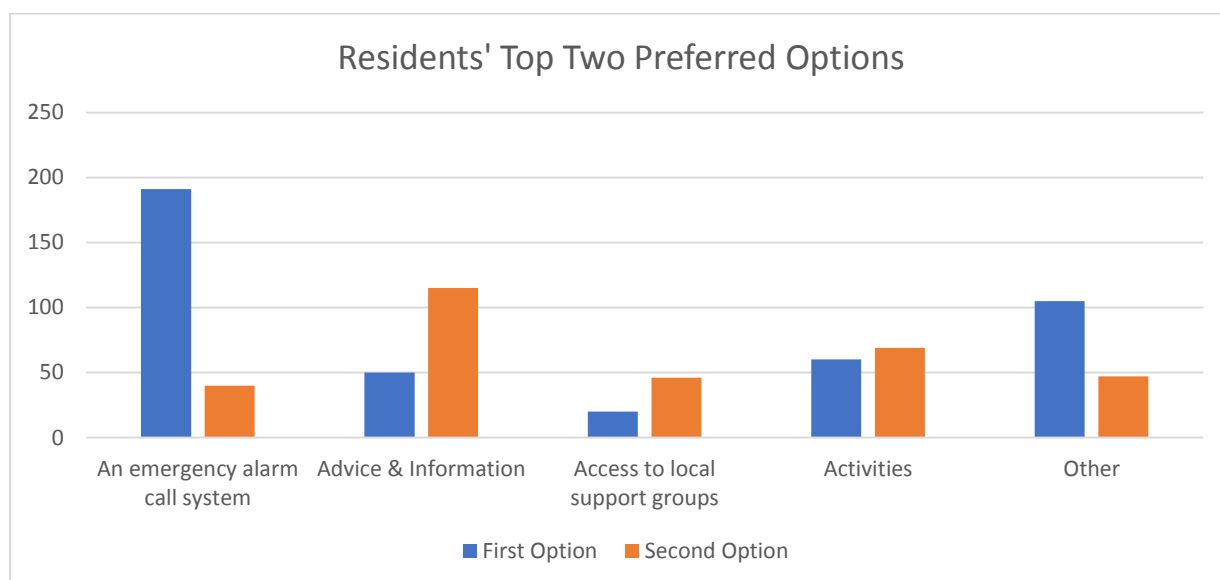
17% of people stated that activities are their favourite option because of the social interaction it afforded. Considering Q4 and Q5, it could be argued that if residents are able to combat feelings of loneliness and social isolation, then they would feel better equipped to be more independent within their own homes.

For those who selected 'other', their reasons for this are set out in the graph below:



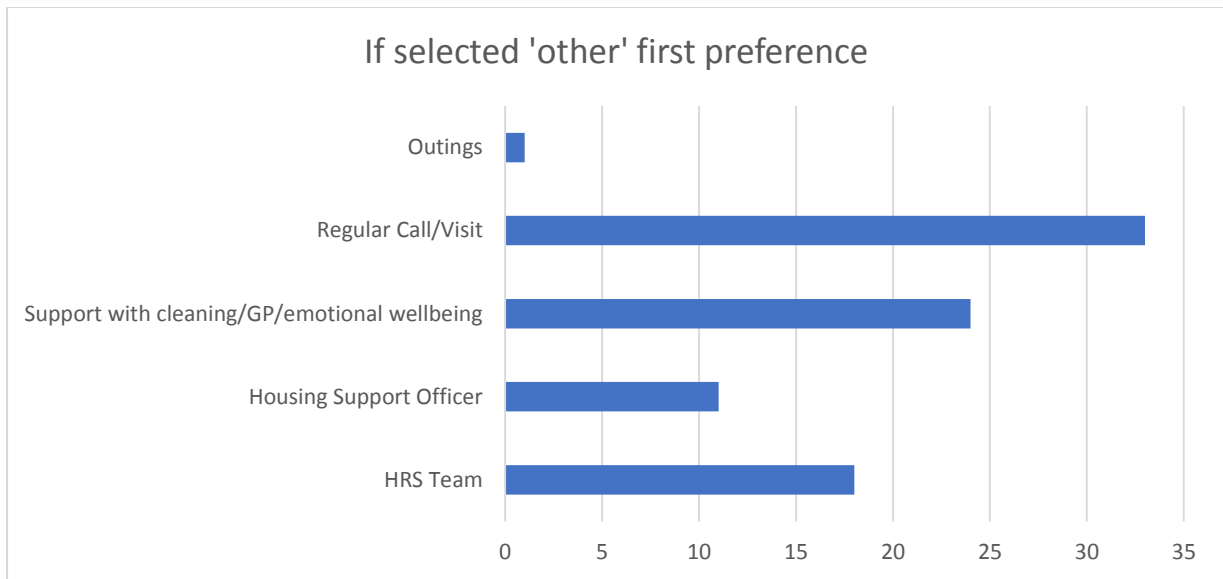
39% of respondents need support with cleaning, contact with their GP and help with their emotional wellbeing to be empowered to be as independent as possible.

Q9a – Please can you tell us your top two preferred options

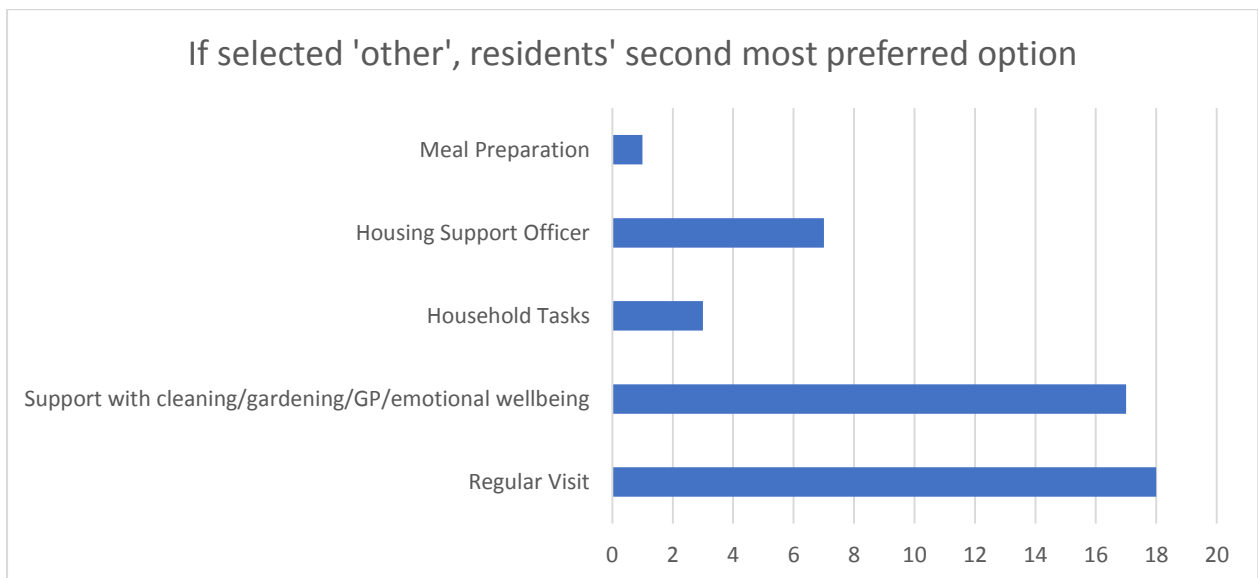


45% of respondents felt that an emergency alarm call system was their preferred option.

36% stated that access to advice and information was their second option.



38% of people wanted a regular call or visit and this links back into the loneliness or social isolation theme.



39% of residents would prefer a 'regular visit' as their second preferred option, with 37% of residents stating that support with cleaning/gardening/their GP and/or their emotional wellbeing is important to them.

Section B

Executive Summary

On the whole, the HRS consultation responses per landlord show us that the more intense the landlord's support, the lower the need for the HRS service. However, when we look at care packages against the responses per landlord and based on the schemes where there are care packages in place, the results are inconclusive. In other words, it is not possible to determine whether someone with a care package is more or less likely to use the HRS service, because the number of care packages is so low (accounting for around one quarter of all residents) and split between each landlord, this dataset becomes even lower.

Background

The consultation suggests that the HRS service is duplicated by the statutory RSL provision, additional analysis has been conducted on the HRS consultation's responses. This analysis considers the consultation's responses per landlord and per social care data.

The hypothesis has been that where a landlord's support is more intense, there is less demand for the HRS service.

The responses indicate that if the HRS service were to be removed, there would be no un-met social care needs. Respondents report using the HRS once a week for up to 30 minutes to support their emotional wellbeing, which does not constitute an eligible social care need.

Landlord Findings

Type of Support Received

Across the 130 HRS schemes there is discrepancy in the type of support provided by the RSLs. Taking each landlord separately, we can see that there are discrepancies in the service provided per landlord; e.g. Selwood and Bournemouth Churches Housing only provide an intensive housing management service, whereas Greensquare and Wiltshire Council facilitate social activities with tenants.

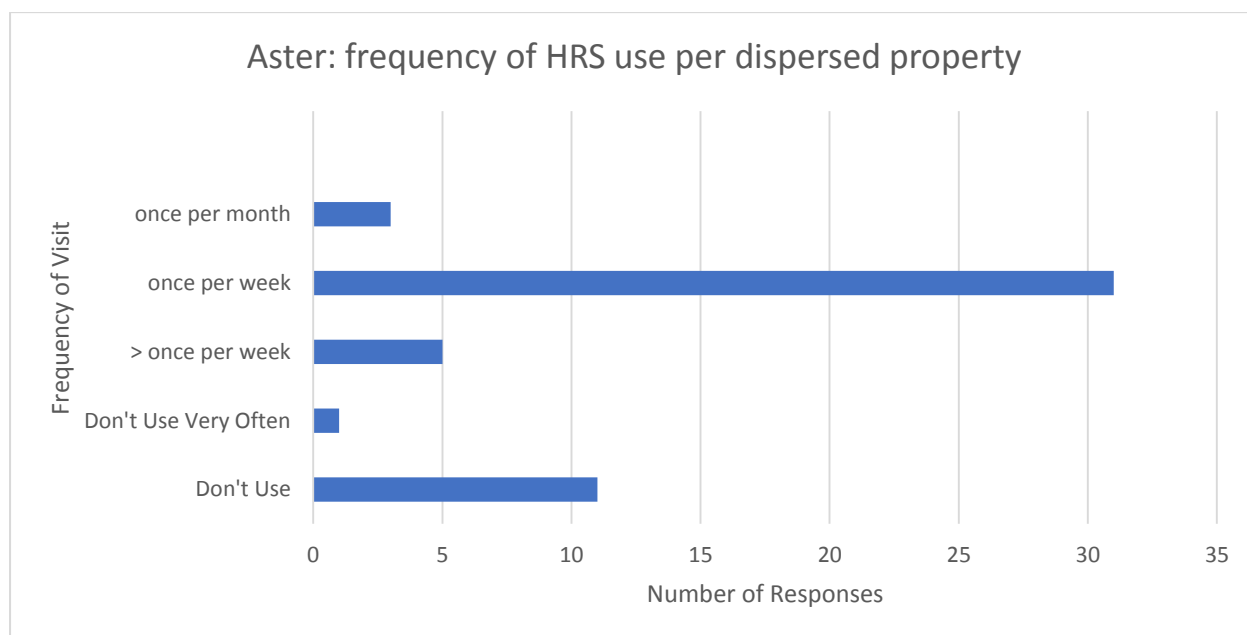
When we consider each landlord's support as a separate entity, we find that there are also discrepancies in the service provided per housing scheme. For example, Aster's dispersed properties¹ (which account for 81% of their HRS stock) only receive a quarterly welfare call and certain Greensquare and Selwood general needs schemes² can access the HRS, as these schemes were initially sheltered housing. This does result in inequity across the general needs schemes.

The data and commentary below, considers these findings in more detail.

¹ Aster's dispersed properties are defined as single dwellings that do not sit in or around a scheme, but are still supported by Aster's Independent Living Team

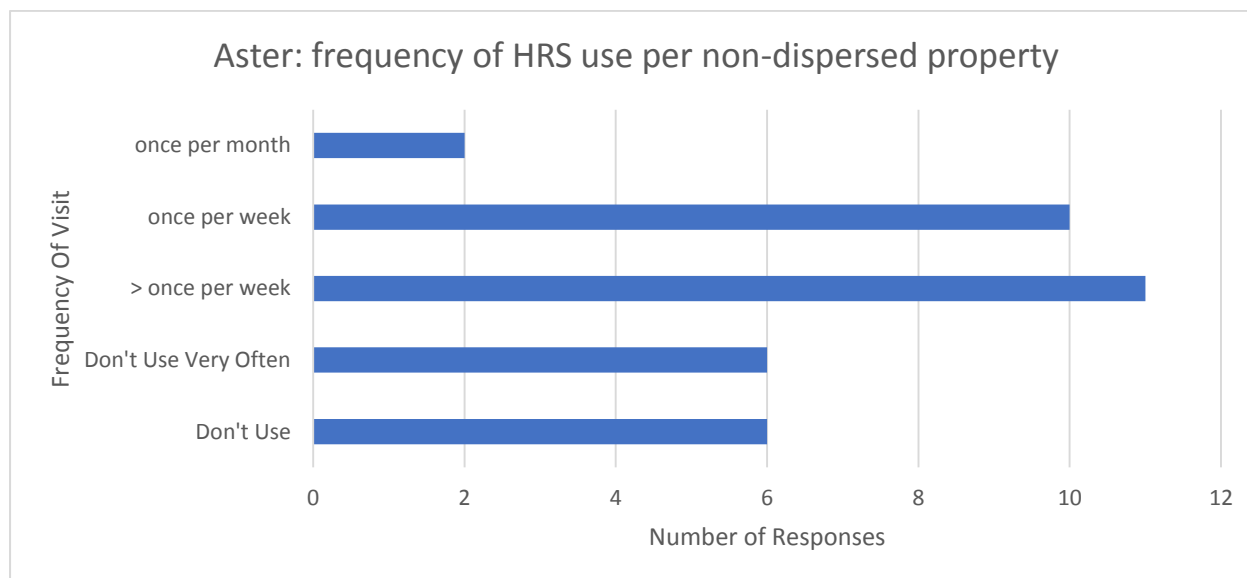
² A general needs scheme is social housing available to anyone who is not in a special needs group – e.g. families / single people

Aster



Dispersed properties only receive a quarterly welfare call from Aster (the landlord). (Dispersed properties are single dwellings that do not sit in or around a sheltered scheme but are still supported by Aster’s Independent Living Team).

Of the respondents who receive a quarterly call from Aster, 69% use the HRS service, with 22% reporting not using the service.



Non-dispersed properties receive a higher frequency of support from Aster (the landlord). (Non-dispersed properties are dwellings that are part of a sheltered housing scheme and receive a more enhanced tenancy service).

60% of respondents use the HRS service either more than once a week, or once a week. 34% of respondents report not using the service very often, or not using it.

The data demonstrates that the HRS service is more popular among those who receive a lower frequency of support from Aster.

Care Package Data

Looking at the social care needs profile of residents living in the dispersed and non-dispersed schemes, we can see the following:

Dispersed schemes (only receiving a quarterly welfare call)

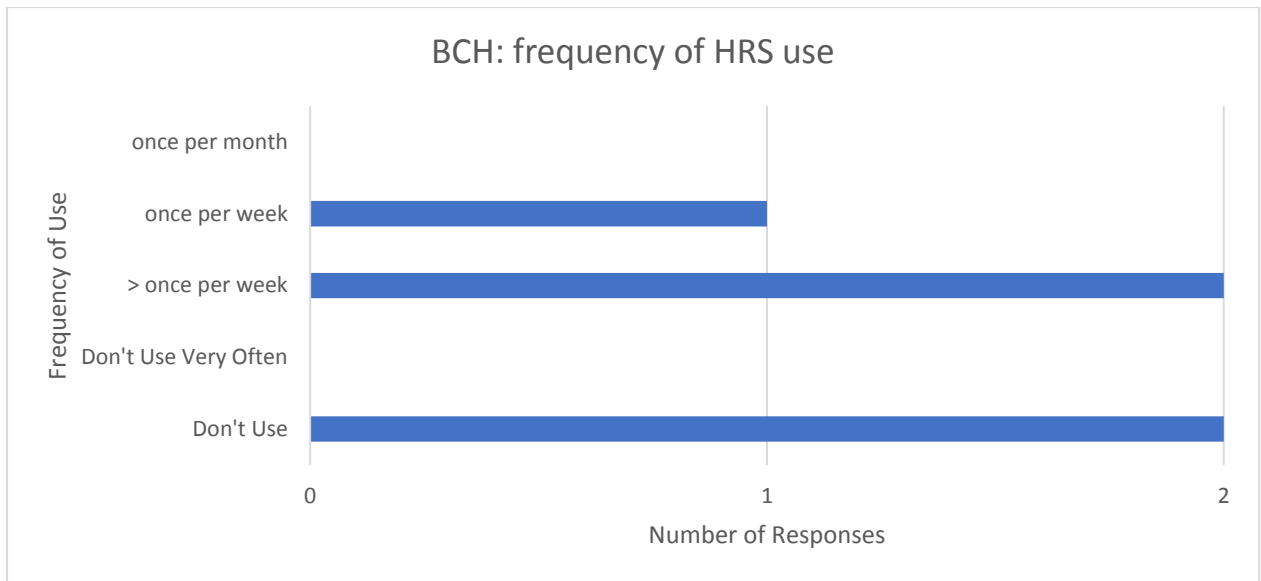
75% use the service once a week, with 25% not using the service. For those who use the service, 66% use it for only a few minutes, whilst 33% use it for up to 30 minutes.

Non-dispersed schemes (higher frequency of support)

Of the respondents, 76% use the service, with 24% either not using the service very often or not using it at all. Of those who use the service, 53% use it for up to 30 minutes, with 47% using it for only a few minutes.

In summary, for Aster's HRS tenants with care packages, there does **not** appear to be a correlation between intensity of landlord support and use of the HRS service. The HRS service is utilised at similar levels by residents both with/without care packages and for similar amounts of time, namely once a week for up to 30 minutes.

Bournemouth Churches Housing



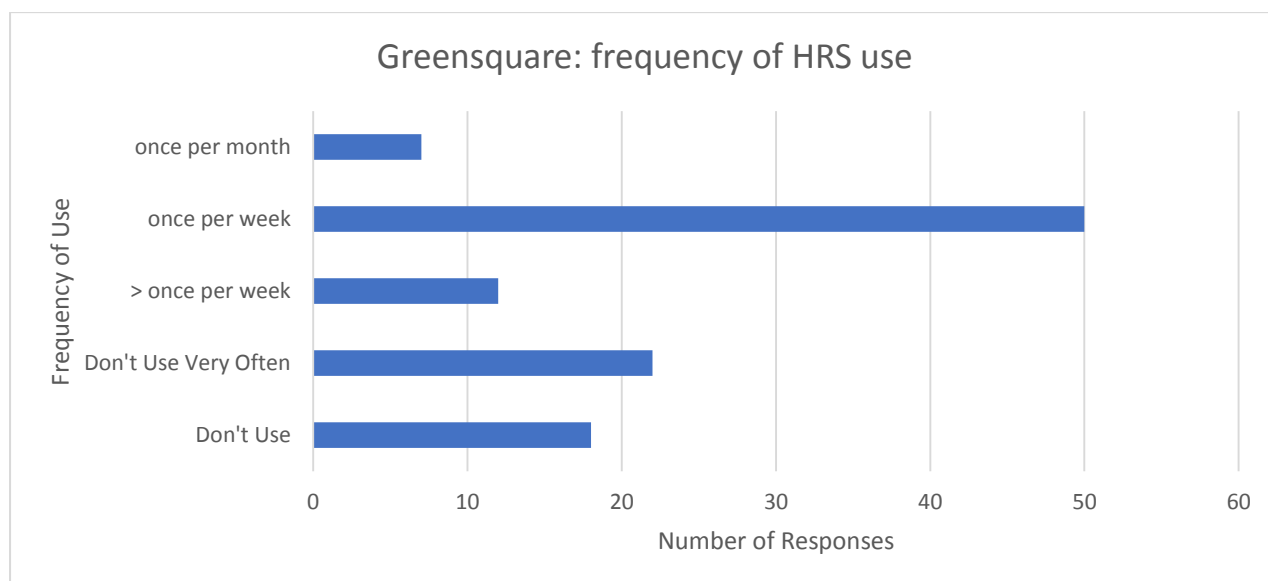
BCH only provide an intensive housing management service.

60% of BCH residents use the HRS service, 40% do not use the service.

Care Package Data

For BCH, there are no residents who receive HRS support who have a care package in place.

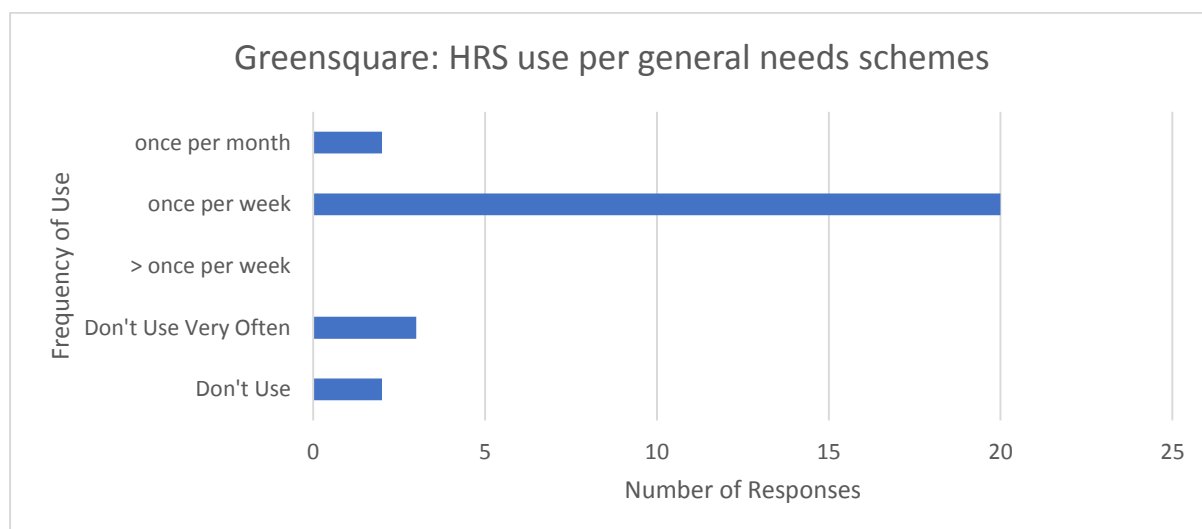
Greensquare



57% of Greensquare’s respondents use the HRS service once per week. 33% of respondents report either not using the service, or not using it very often.

There is a discrepancy in the type of RSL support provided to each of Greensquare’s schemes that receive HRS. For example, 13 of Greensquare’s HRS schemes are let as ‘general needs’, meaning they do not receive any intensive housing management support.

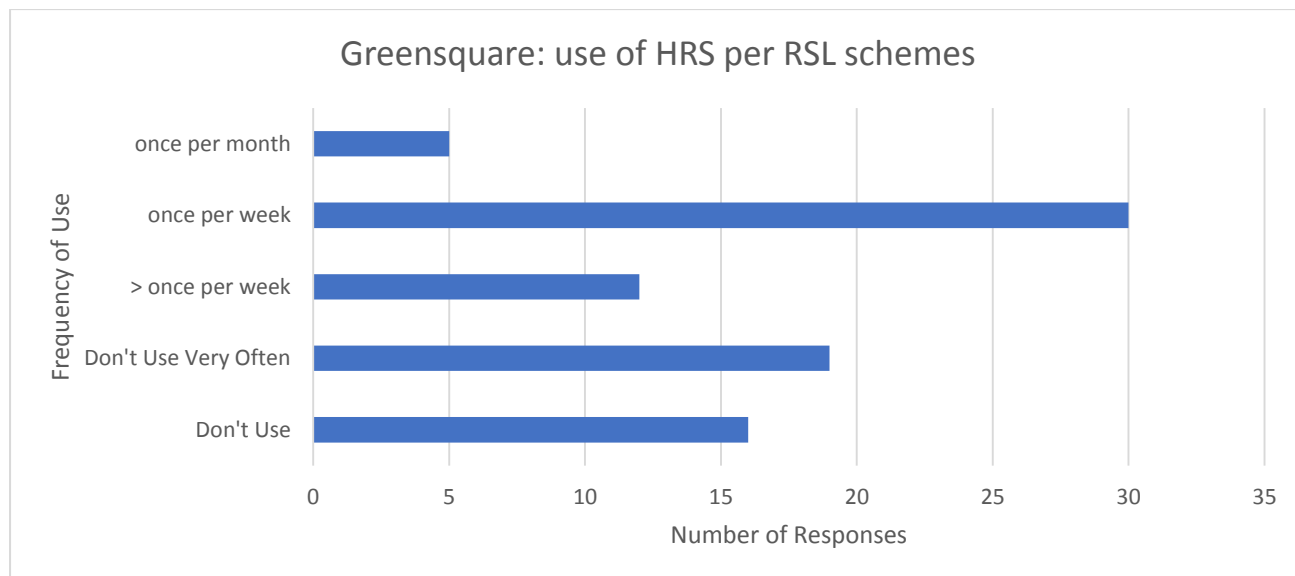
The rest of Greensquare’s schemes are let as ‘55+’ schemes, which means that these dwellings are only available to those over the age of 55. All the 55+ schemes have personal and fire alarms and receive a weekly visit from a Community Officer, which is not the same for the general needs schemes.



The above shows that Greensquare’s general needs schemes do use the HRS service. For example, 81% reported use the service, mostly once per week and 19% don’t use the HRS service or don’t use it very often.

In summary, for Greensquare's general needs schemes, HRS is very popular. This demonstrates that there is inequity in provision, as not all general needs sheltered schemes in Wiltshire can access the HRS service.

The following graph considers the responses from Greensquare's schemes that are classed as 55+ (the 55+ schemes have personal and fire alarms and receive a weekly visit from a Community Officer).



The above shows that 57% of respondents in Greensquare's 55+ schemes use HRS, with most using the service once a week. 43% of respondents do not use the service very often or do not use it.

If we consider these results against those from Greensquare's general needs schemes, we can see that the service is more popular among the general needs schemes. Therefore, it is possible to conclude that among Greensquare tenants, the lower the intensity of the landlord's support, the higher the use of the HRS.

Care Package Data

General Needs Schemes

90% of these residents use the HRS service once a week. 10% do not use the service. Of those who do use the service, 75% use the service for up to 30 minutes, with 25% using the service for only a few minutes.

Sheltered Housing over 55s

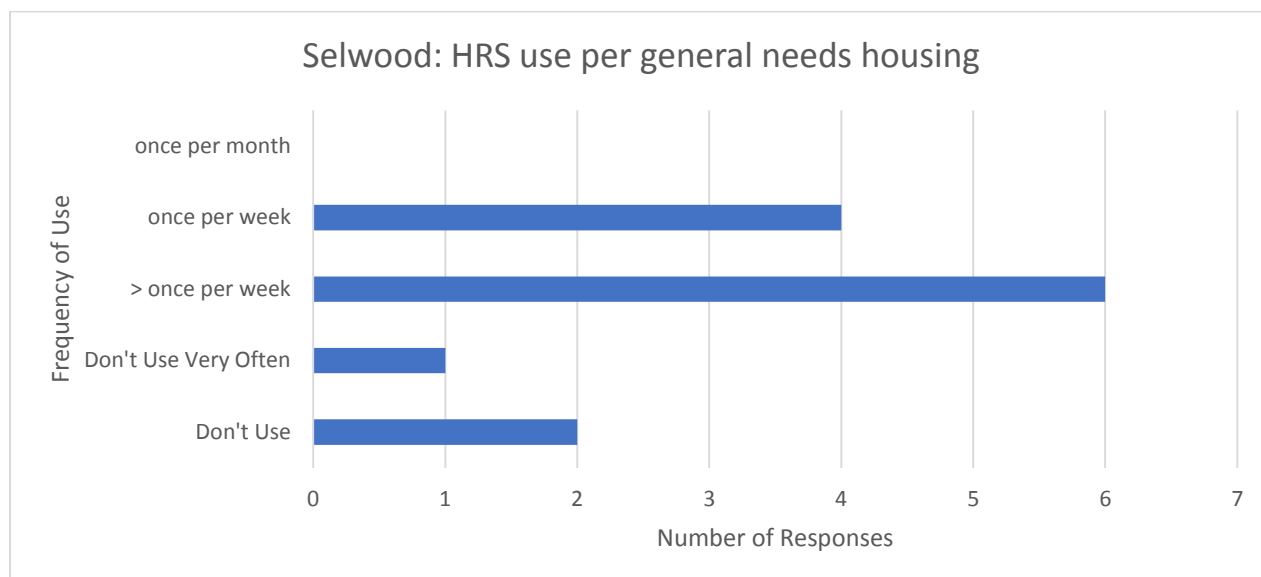
68% of these respondents use the HRS service, on average of once per week. Respondents use the service for 33% for each time frame: only a few minutes, up to 30 minutes or for one hour.

Greensquare's results show us that, when it comes to care packages, if someone resides in a general needs scheme, they are more likely to use the HRS service. Additionally, social care data shows that if a Greensquare tenant lives in a general needs scheme, they are more likely to have a package of care than their sheltered

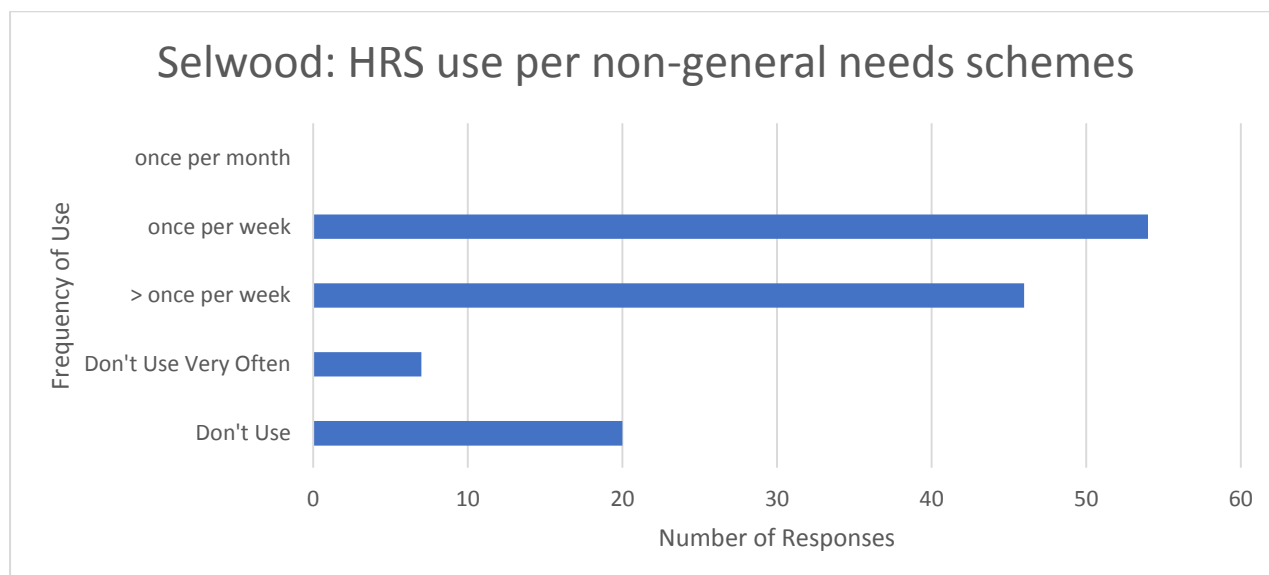
housing counterparts. For example, 29 residents have care packages in Greensquare's general needs schemes, against 23 residents in the 55+ sheltered housing schemes. There are more schemes categorised in the 55+ sheltered housing schemes.

Selwood

Selwood only provides an intensive housing management service as part of its RSL obligations. There are 10 schemes that are let as general needs housing, these schemes do not receive the enhanced landlord service that Selwood provides to its sheltered housing tenants.



77% of respondents use the service, 46% more than once a week. 23% either do not use the service, or do not use it very often. In summary, the HRS service appears popular among Selwood’s general needs tenants.



78% of respondents use the HRS service, 43% once a week. 21% of respondents do not use the service often, or do not use it. This indicates that the HRS is equally popular among Selwood’s non-general needs schemes.

Comparing the two datasets, we can see that there is virtually no discrepancy in service use. In conclusion, the type of housing scheme that Selwood tenants live in does **not** affect usage of the HRS. This is likely to be because the RSL service

Selwood provides is more limited than most other HRS landlords and does not vary between schemes.

These results should be considered with caution, because the dataset for Selwood's general needs properties is low, only having received 13 responses.

Care Package Data

General Needs Schemes

There are only two residents within the two general needs schemes (Downside Park and The Elms) who responded to the consultation. Both these individuals have opted-out of receiving HRS support.

Considering all of Selwood's general needs schemes (regardless of whether they received responses to the consultation), we can see that only one person receiving HRS support has a care package in place.

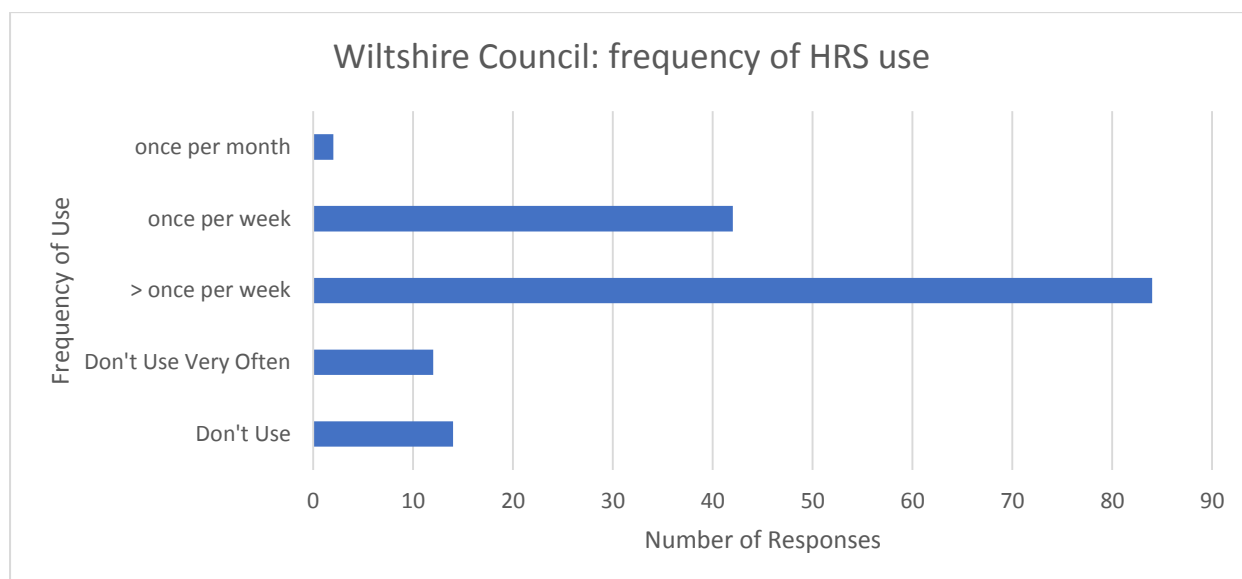
Sheltered Housing over 55s

Looking at Selwood's schemes that receive intensive housing management support, 13 residents have opted-in to the HRS service and have care packages in place.

75% of respondents within these schemes say that they use the HRS service, with 55% using the service more than once a week and 45% using it once a week. 25% of all respondents report not using the service, or not using it very often.

As the dataset is too small for general needs schemes, it is not possible to conclude whether having a care package in place means someone is more/less likely to use HRS. What is clear is that the HRS service remains popular among Selwood's non-general needs schemes, where someone may have a care package in place.

Wiltshire Council



All of Wiltshire Council's schemes receive the same type of landlord support, therefore consultation responses have not been broken down into additional datasets.

83% of respondents stated that they use the HRS service, with 55% using HRS more than once a week. 17% reported not using the service, or not using it very often.

Care Package Data

85% of residents with care packages use the HRS service, on average more than once per week, with 15% reporting that they either do not use the service often or do not use it at all.

Conclusion

The less intensive the landlord's housing support, the greater the demand for HRS.

As the consultation was anonymised, whilst a resident may have responded from a scheme listed as having residents with care packages, we cannot be certain that any consultation responses from this scheme came directly from individuals with a care package.

In terms of whether removing the HRS service would lead to a greater demand for adult social care, this is unlikely to be the case. As most residents use the HRS service once a week for up to 30 minutes, this level of need does not meet the adult social care eligibility criteria for formal support. This assumption is explored further below.

Conclusion

With the exception of Wiltshire Council tenants, tenants with care packages are more likely to value the activities aspect of the HRS service than their non-care package counterparts. This may be because those tenants with care packages may be less independent, e.g. unable to visit shops or community groups independently

All residents, regardless of whether they have a social care need appear to most value the HRS service because it reduces their social isolation and supports their emotional wellbeing. These aspects alone are not considered an eligible social care need. People are encouraged to meet these needs via other means, such as community groups or voluntary services.

The data indicates that removing the HRS service is unlikely to lead to an increase in tenants' need for adult social care support.

Conclusion

Whilst there is no global agreement on what constitutes a satisfactory survey response rate, many academics and engagement professionals stipulate that a 10-15% response rate is positive. As the HRS consultation received a 60% response rate and as similar response levels were received for both the HRS providers (Cera Care and Somerset Care), the HRS consultation's results can be taken as representative of service users.

The survey's results have shown that social isolation and loneliness are what many of the HRS clients either experience or are at risk of experiencing. The most interesting finding comes [from Q9](#), which indicates that if residents do not feel isolated or lonely, they are more likely to be more independent and, therefore, less likely to need to rely on formal care and support. Additionally, a significant majority of respondents stated that they receive help from either their family, a friend or a carer ([Q7](#)) and most value having someone to talk to ([Q4](#)), mechanisms which reduce social isolation.

As there was confusion among respondents about the role of the HRS worker and the Housing Support Officer, this evidences the fact that the HRS service can be regarded as duplicated by the statutory RSL service. We have also learnt that some general needs schemes are benefitting from the HRS service, although the service is not available to all general needs sheltered schemes in Wiltshire.

This consultation has shown us that residents mainly use the HRS to reduce their loneliness or risk of social isolation. It also provides further evidence that the HRS role & Housing Support Officer roles are duplicated and that there is inequity of service provision across Wiltshire.

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Resident Questionnaire: Housing Related Support

Dear Resident,

I hope this letter finds you well. I'm writing to you about the housing related support service that is provided in sheltered housing by Cera Care in some schemes, and by Somerset Care in others.

Housing related support is what we call 'low level' support which helps people carry on living independently and manage their living arrangements. This is different to personal care or domestic services that some people also receive (some residents may even have these types of care from Cera Care or Somerset Care too).

Until now, the service hasn't been based on whether people need the service. Instead, it has been offered as a choice, and only available to those people living in sheltered housing. Since the service has been in place, newer ways to support independent living have been successfully developed.

With Cera Care and Somerset Care's contracts coming to an end in March 2021, we think it's time to bring the way we do things up to date. We want to make the right support available to those who need it, wherever they live in Wiltshire. Any changes will not affect any packages of personal or other eligible care.

It would really help us plan for the future to know a little bit about how you currently use the housing related support service, as well as any other care and support needs you might have and your thoughts on living independently in the future. We would appreciate it if you would take a few moments to answer the questions below and return to us using the prepaid envelop by Friday 4 December 2020

We hope you agree that this is a positive move. Thank you for your time.

Yours sincerely,



Vincent Edwards

Head of Adults Commissioning

Housing Related Support (HRS) – Resident Questionnaire

Please remember these questions relate to the housing related support (HRS) services from Cera Care or Somerset Care, and not any other kind of support or registered care from those or other companies.

If you need support to help you complete this questionnaire or wish to submit your responses by phone then please contact Wiltshire Centre for Independent Living on 0300 1233 442 and quote reference number: HRS2020 someone will be able to help you to provide your answers.

About the HRS Service

Q1: Are you the resident or are you completing this form on behalf of someone

- I am the resident
- I am completing this on behalf of someone else

Q2: Where do you live? (name of sheltered housing scheme)

.....

Q3: Who is your current HRS provider?

- Cera Care
- Somerset Care
- Don't know

Q4: What support do you value most from the HRS service?

- Managing money and bills
- Emotional wellbeing
- Not feeling lonely
- Activities
- Other (please tell us)

.....

Q5: How often do you use the HRS service? (please choose the closest option which describes your situation)

- More than once a week
- Once a week
- Once a month
- I don't use it very often
- I do not currently use the service (please go to question 7)

Q6 – If you do use the service, how long do you see the housing related support worker for?

- only a few minutes
- up to half an hour
- up to one hour
- over one hour

Q7: Please can you tell us about any other support you receive?

- A care worker helps me with personal care / housework / shopping
- Local support group (For example, Age UK)
- Support from family / carer / friend
- Health Care (for example District Nurses)
- Other.....
- I do not currently receive any other support

About You

Q8 – the statements below relate to the kind of things that HRS supports people with. Please tell us whether you agree with the following statements (please put a tick in the box that's closest to how you feel)

| | 'I agree' Or 'I don't need any help' | 'I need a little bit of help now and again' | 'I disagree' or 'I need regular help' | 'Not relevant' or 'would rather not say' |
|---|--|--|--|---|
| I can manage my tenancy and living arrangements | | | | |
| I can manage my money | | | | |
| I am safe in my home | | | | |
| I have interests that keep me occupied | | | | |
| I maintain regular social contact with others | | | | |
| I can manage my emotional wellbeing | | | | |
| I am not concerned about how much alcohol I drink | | | | |

Q9: Thinking about the future, what services, if any, would you want to have available to enable you, to continue to live as independently as you can, within your own home?

An emergency alarm call system

Advice and information

Access to local support groups

Activities

Other (please tell us)

.....

I don't need any service

Please can you tell us your top 2 preferred options:

First

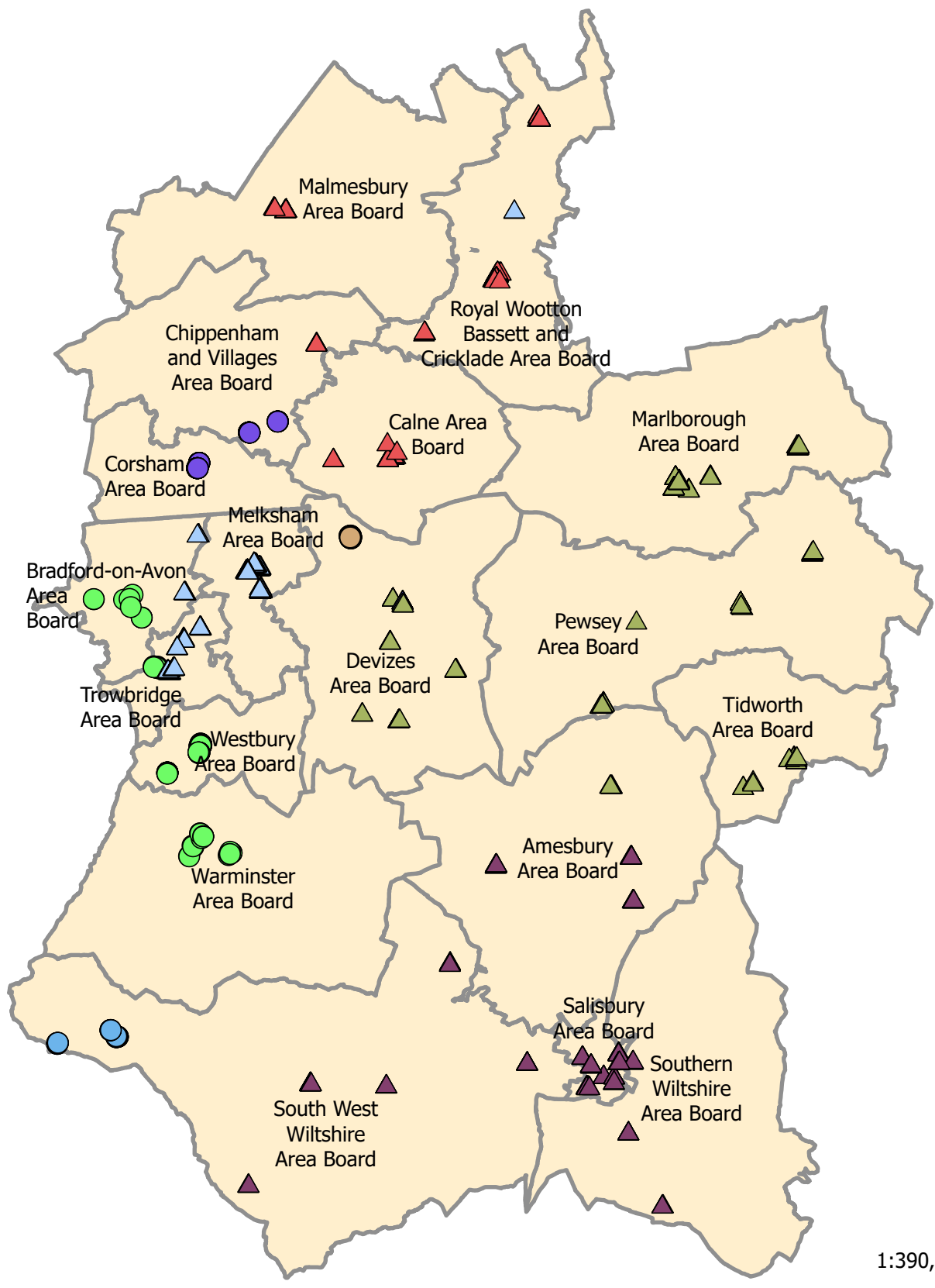
Second

Please note that the council cannot guarantee your top preferred option as residents' views vary.

.....

Thank you for your time. It's a great help!

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Housing Related Support by Provider and Landlord

- | | |
|----------------------|--------------------------------|
| Somerset Care | Cera Care |
| ● Aster | ▲ Aster |
| ● Greensquare | ▲ Bournemouth Churches Housing |
| ● Selwood | ▲ Greensquare |
| ● Wiltshire Council | ▲ Selwood |
| | ▲ Wiltshire Council |

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Social Care Needs Profile of Housing Related Support Clients

A desk top analysis of clients' social care packages within the sheltered schemes was undertaken. The analysis compared clients' social care need between those who were in receipt of a housing related service and those who had opted out. The results of the analysis are presented in the tables below.

| Council-funded care packages aggregated across the 243 residents with care packages who are eligible to receive a Housing Related Support Service and compared between opted in and opted out residents | |
|--|---|
| Overview | |
| Opted out | Opted in |
| Home Care Packages | |
| <ul style="list-style-type: none"> ➤ 113 clients ➤ Average 11.2 hours PW ➤ Average £276.50 cost PW | <ul style="list-style-type: none"> ➤ 45 Clients ➤ Average 13.11 hours PW ➤ Average £361.93 PW |
| Comments | <ul style="list-style-type: none"> ➤ Greater level of need with the opted in residents with larger care packages than those residents not in receipt of an HRS service |
| Live in care | |
| <ul style="list-style-type: none"> ➤ 3 clients ➤ Average cost of £851.25 per week | <ul style="list-style-type: none"> ➤ 0 |
| Comments | <ul style="list-style-type: none"> ➤ No opted in customers have live in care and this would be expected |
| GLA (Good Lives Alliance) | |
| <ul style="list-style-type: none"> ➤ 15 clients ➤ Average £434.97 cost PW | <ul style="list-style-type: none"> ➤ 3 ➤ 190.83 |
| Comments | <ul style="list-style-type: none"> ➤ Very low uptake on the HRS service from GLA customers |
| Day Care | |
| <ul style="list-style-type: none"> ➤ 15 ➤ Average cost £153.38 PW | <ul style="list-style-type: none"> ➤ 0 |
| Comments | <ul style="list-style-type: none"> ➤ Day care customers do not use the HRS service |
| Personal Assistants | |
| <ul style="list-style-type: none"> ➤ 18 Clients ➤ Average package 40 hours PW ➤ Average cost £370.34 PW | <ul style="list-style-type: none"> ➤ 8 Clients ➤ Average package 10.44 hours PW ➤ Average cost £132.52 PW |

| | | |
|---|---|--|
| Comments | ➤ High number of opted out customers have personal assistants and larger packages | |
| Direct Payments | | |
| ➤ 20 clients excluding 18 clients with personal assistants | ➤ Average package 20.21 hours PW | ➤ Average cost £354.44 cost PW |
| | | ➤ 5 Clients excluding 8 clients with personal assistants |
| | | ➤ Average package 9 hours with one unspecified |
| | | ➤ Average cost £154.08 |
| Comments | ➤ Lower proportion of opted in customers have direct payments and those packages are smaller | |
| Telecare | | |
| ➤ 25 clients | ➤ Only one client has no other care packages | ➤ 9 clients all with other care packages |
| Comments | ➤ More opted out residents have telecare and is also proportionally higher than those opted in | |
| Sitting Service | | |
| ➤ 4 clients | ➤ Average cost £87.52 | ➤ 5 clients |
| | | ➤ Average cost £86.99 |
| Comments | ➤ Statistically too small to draw conclusions | |
| Respite | | |
| ➤ 6 clients | ➤ Average £1820.76 cost PA | ➤ 2 clients |
| | | ➤ Average cost £1520 PA |
| Comments | ➤ Small number but positively skewed towards opted out clients who also have higher costs. Though statistically too small to draw conclusions | |
| Reablement | | |
| ➤ 1 | | ➤ 0 |
| Comments | ➤ No comments | |
| <p>➤ <i>In the majority of cases, the level of individual care need is comparable to that used to support people living in general needs / 'non-specialist' accommodation.</i></p> <p>➤ <i>There is no evidence to suggest that the HRS reduces dependency on formal social care. GLA customers have very low uptake on the HRS service</i></p> <p>➤ <i>A GLA client represents higher levels of need, though the number is very limited and only represent 7.5% of those residents with council funded care packages</i></p> <p>➤ <i>Reablement is a time limited package of support (e.g. post-hospital discharge or to maximise functioning) and often does not conclude with an ongoing package of care</i></p> | | |

Table One

Data source: 365 report Dec 2020

Below is a breakdown of social care need across different geographical locations in Wiltshire:

| Council-funded care packages aggregated across the 243 residents with care packages who are eligible to receive a Housing Related Support Service and compared between opted in and opted out residents and compared across different geographical regions | |
|--|--|
| Opted out | Opted in |
| North | |
| <ul style="list-style-type: none"> ➤ 46 clients ➤ Average 11 hours PW ➤ Average £276 cost PW | <ul style="list-style-type: none"> ➤ 9 Clients ➤ Average 11 hours PW ➤ Average £279 PW |
| Comments | <ul style="list-style-type: none"> ➤ The level of need between opted in and opted out clients is very similar but proportionally there are more opted out clients with packages. |
| East | |
| <ul style="list-style-type: none"> ➤ 25 Client ➤ Average 11 hours PW ➤ Average £241 cost PW | <ul style="list-style-type: none"> ➤ 16 Clients ➤ Average 14 hours PW ➤ Average £321 PW |
| Comments | <ul style="list-style-type: none"> ➤ Greater level of need with the opted in residents, with larger care packages than those residents not in receipt of an HRS service, but proportionally distributed in terms of number of clients with packages of care |
| South | |
| <ul style="list-style-type: none"> ➤ 18 clients ➤ Average 11 hours PW ➤ Average cost of £274 per week | <ul style="list-style-type: none"> ➤ 24 Clients ➤ Average 12 hours PW ➤ Average £359 PW |
| Comments | <ul style="list-style-type: none"> ➤ Slightly greater level of need with the opted in residents with larger care packages than those residents not in receipt of an HRS service, but proportionally distributed in terms of number of clients with packages of care |
| West | |
| <ul style="list-style-type: none"> ➤ 91 clients ➤ Average 11 hours PW ➤ Average £282 cost PW | <ul style="list-style-type: none"> ➤ 14 Clients ➤ Average 15 hours PW ➤ Average £382 PW |
| Comments | <ul style="list-style-type: none"> ➤ We see the largest proportion of clients with social care packages in the West but proportionally less opted in clients with care packages. However, those opted in clients have larger care packages. |
| <p><u>Summary:</u> <i>On the whole opted-in HRS clients have greater levels of need than those not in receipt of the HRS service, judging by the size of the support packages in place. This further evidences that the HRS service does not contribute to individuals not needing to rely on formal services for support.</i></p> | |

1. The table above shows an uneven distribution of care needs across the different areas of Wiltshire. The East shows the lowest level of need, whilst North and South have relatively similar levels of need and the West has the highest level of need.

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Wiltshire Council

Cabinet

29 June 2021

Subject: Disposals Programme Update

Cabinet Member: Cllr Phil Alford Cabinet Member for Housing, Strategic Assets and Asset Transfer

Key Decision: Non Key

Executive Summary

The council has a programme of sites that are surplus to operational requirements and disposal or reuse for alternate purposes generates capital to support Councils overall Capital Programme. This report sets out performance over the last three years and forecast receipts from disposals for the next two financial years. The report further seeks approval to declare specific sites surplus and capable of review to determine the best financial return for the council; the 3 assets to be declared surplus are listed in Appendix 2.

Proposal(s)

That Members:

- Note the position in respect of disposals for financial years 2021/22 and the projected receipts for 2022-4.
- Confirm that the freehold interest of the 3 assets can be sold by the Council.
- Authorise the Director for Housing and Commercial Development to dispose of the freehold interest in the assets or in his absence the Corporate Director – Resources, following consultation with the Cabinet Member for Leisure, Libraries, Governance, Facilities Management and Operational Assets; and Cabinet Member for Strategic Assets and Asset Transfer.

Reason for Proposal(s)

To note the current position in respect of capital receipts and the new targets for the next two financial years and confirm the freehold interest in the assets can be sold to either generate capital receipts in support of the Council's capital programme or reuse to generate income for the Council.

Terence Herbert
Chief Executive

Wiltshire Council

Cabinet

29 June 2021

Subject: Disposals Programme Update

Cabinet Member: Cllr Phil Alford Cabinet Member for Housing, Strategic Assets and Asset Transfer

Key Decision: Non Key

Purpose of Report

1. The purpose of this report is to note the position in respect of capital receipts targets for the last three years and the new targets for the next two financial years. Also, to confirm the freehold interest in the assets can be sold to either generate capital receipts in support of the Council's capital programme or reused to generate income for the Council. The freehold interest in the 3 assets referred to in Appendix 2 are to be declared specific sites surplus and capable of review to determine the best financial return for the council.

Relevance to the Council's Business Plan

2. The disposal of assets raises capital to assist and support the Council's medium term financial plan (MTFP) which subsequently supports the Council's Business Plan and its aims and targets. Specifically, the business plan describes taking *a commercial approach to managing assets* as part of the *Working with partners as an innovative and effective council priority*.

Background

3. On 26th March 2019, Cabinet approved a revised approach to disposal of surplus assets and the process is outlined in Appendix 1. This report sets out the current and forecast position for disposals and capital receipts.
4. Once assets are declared surplus each site is considered by the Asset Gateway Group to determine the best financial return for the Council, during which time other uses of the sites are considered. The Group determines what is in the best interest for the Council, from a service, community or financial perspective.
5. In addition, the 3 assets listed in Appendix 2 are recommended for declaring surplus and capable of review.

Main Considerations for the Council

6. The receipt of capital from the sale of assets is used to support the capital programme of investment in the communities of Wiltshire. Examples of the

types of investment made and programmed to be made are provided in the Council's Budget but they range from investment in better roads, waste collection and recycling, extra care homes, health and wellbeing centres and initiatives to provide better and more efficient customer access to Council services.

7. Running, managing and holding assets is expensive but with careful investment as described above, services can be transformed and delivered in a way that improves customer satisfaction and relies less on needing a building/asset for service delivery.
8. Assets then become surplus to the core requirements of the Council and are available for alternate uses. One option is disposal where the capital realised can then be used to support further investment.
9. At Cabinet on 12 September 2017, the Cabinet resolved that the Council would not consider domestic / low value requests for land purchases. This approach will continue into the foreseeable future.

Overview and Scrutiny Engagement

10. The Financial Planning Task Group, on 26th November 2020, considered the Cabinet paper for 1st December 2020 and the comments from the group have been incorporated into the process of dealing with surplus assets.

Safeguarding Implications

11. There are no direct safeguarding implications with this proposal.

Public Health Implications

12. There are no direct public health implications with this proposal.

Procurement Implications

13. The decision to dispose of the freehold interest does not have any direct procurement implications. However, when the appointment of agents to market the assets or when pre-marketing surveys are required, their procurement is carried out in accordance with the Council's procurement rules and policies.

Equalities Impact of the Proposal

14. None

Environmental and Climate Change Considerations

15. Where a sale envisages potential development, any environmental and/or climate change issues are best considered through the planning application process. Should the review identify an opportunity to retain sites the environmental and climate change considerations shall be considered as part of the business case for re-use of the site.

16. Consolidation of the Council's estate contributes to a reduction in our carbon footprint overall and therefore our council carbon neutral goal.

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

17. The Medium Term Financial Plan (MTFP) for the Council is, in part, dependent on the success of the disposal of property and assets. Failure to decide to declare new freehold interests to be sold, failure to sell those that are currently declared or an inability to re-use existing assets for alternate purposes will impact on the council's ability to achieve its overall business plan.

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

18. A risk that may arise is that due to legislative or other changes a service need arises for an asset after it has been sold and the Council then has to look to acquire or rent in an asset. However, the list of assets will be considered by the Chief Executive and Directors, via the Asset Gateway Group, to determine if there is an identified service need that could be fulfilled from any of the properties on the list in Appendix 2. The purpose of the Asset Gateway Group is to establish service needs and establish the appropriate property solutions to satisfy these.

Financial Implications

19. As explained above, the realisation of capital from the sale of assets is used to support the MTFP and Council Business Plan. Reducing sales and the delivery of capital receipts will reduce the amount that the Council can invest in its communities and/or be used to reduce borrowing requirements and thus free up revenue for delivering services. The disposal of surplus assets is not only integral to the council's medium term financial planning but often makes good asset management sense too.
20. A capital receipt target for three years from 2018/19 was set at £24.969m and the actual receipts from sales is set out below, net of costs of enhancement and sale:

| Summary | | | |
|-------------------------|---------------------|--------------|---------------------|
| As at 31/03/21 | | | |
| Receipts targets | | Sites | Total |
| 2018/19 | £ 10,575,520 | 25 | £ 11,262,577 |
| 2019/20 | £ 9,066,000 | 22 | £ 9,388,585 |
| 2020/21 | £ 5,327,800 | 19 | £ 5,709,117 |
| | £ 24,969,320 | | £ 26,360,279 |

Variance

£ 1,390,959

The targets to be applied across the next two financial years are noted below, together with an early indication of the number of sites and values expected to contribute towards meeting those targets. Performance against targets is undertaken through a monthly monitoring process:

| Next receipt targets (as at 01/04/2021) | | Sites Banked | Forecast | Total | |
|--|-------------------|---------------------|--------------------|--------------------|----------------|
| 2021/22 | £3,277,000 | 24 | £ 859,537 | £ 3,108,127 | £ 3,967,664 |
| 2022/23 | £2,639,000 | 17 | | £ 2,639,007 | £ 2,639,007 |
| | £5,916,000 | £ 859,537 | £ 5,747,134 | £ 6,606,671 | |
| | | | Variance | £ | 690,671 |

Legal Implications

21. There are no legal implications with the paper other than it will result in legal work to formalise them. In respect of the assets being put forward as part of the programme, each asset is to be sold at or above market value, thereby ensuring that the best price properly payable will be received thus satisfying the requirements of s123 of the Local Government Act 1972. Market value will be determined by either open marketing of the sites or through an external valuation being procured to reflect any special circumstances. The assets will also be categorised as strategic assets due to their strategic importance to contribute to the MTFP and will not be available for Community Asset Transfer unless Cabinet subsequently decides otherwise.
22. Legal Services will work with Estates & Development to investigate the freehold titles to the properties and identify any site constraints that will need to be considered on any proposed disposal.

Workforce Implications

23. The sites being declared surplus do not have any staff located, thus there are no workforce implications to be considered. Any work on reviewing assets will be carried out within existing staff resources.

Options Considered

24. Declaring additional assets surplus to the requirements of the Council will provide additional funds for the Medium Term Financial Plan and Council's Business Plan. Prior to disposal the Council will undertake a thorough review of the options for assets ensuring the outcome is in the best interest of the Council.

Conclusions

25. To note the progress of property sales to generate capital receipts in support of the Council's capital programme and to maximise the amount of capital from them to support the MTPF and Council Business Plan, after a review of the options to determine how the best interest of the Council can be achieved.

Simon Hendey (Director - Housing and Commercial)

Report Author: Robert Scott, Senior Estates Manager - Commercial,
Robert.Scott@wiltshire.gov.uk,

Date of report May 2021

Appendices

Appendix 1 - Disposal Process

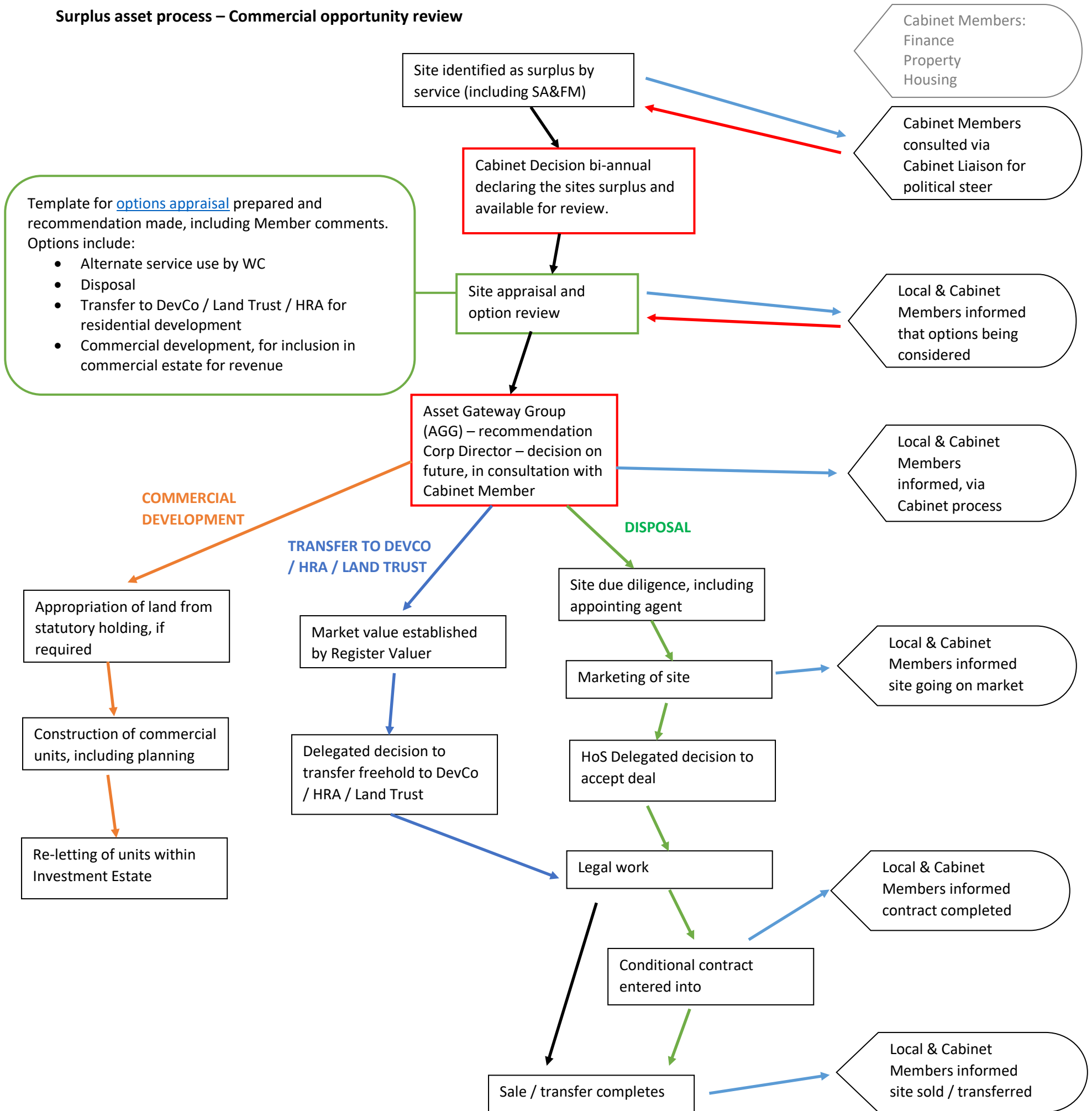
Appendix 2 - Sites to be declared surplus

Background Papers

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

None.

Surplus asset process – Commercial opportunity review



Benefits of revised approach

- Improved prior notification for Cabinet Members of the sites that are being considered for review and sale.
- Reduction in reports being presented to Cabinet, currently every 2/3 months whereas revised approach is bi-annual report
- Greater visibility of progress for sales within a particular financial year
- Greater due diligence to establish the best option for the Council (via robust option appraisal)

Disposal / sales reporting process

- Annual report to Cabinet summarising the disposals undertaken in a financial year and sites declared surplus for forthcoming years. Report will include a statement about future year's targets and a basic summary of whether we are *overall* forecast to achieve (no site details provided for future years). Reported to Cabinet either in April or May.
- Bi-annual report to Cabinet setting out progress of disposals against target, including a list of "pending" transactions, for that financial year. Reported to Cabinet either October or November.
- Monthly reports on progress within financial year provided to Cabinet Member (Property and Finance), setting out the headlines for the month.
- Cabinet Members to receive minutes of Asset Gateway Group.

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Appendix 2 - Sites to be declared surplus (available for option review)

| Town | Site | Site reference | Current stage of review |
|--------------|---|----------------|-------------------------|
| Broad Hinton | Land adjoining Tom Gallagher Van Centre | 07009S1 | Surplus Approval |
| Amesbury | Land at High Post | 01653S1 | Surplus Approval |
| Calne | Former Ambulance & Fire Station | 10147S1 | Surplus Approval |
| | | | |
| | | | |
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Wiltshire Council

Cabinet

29th June 2021

Subject: Electricity and Gas purchasing arrangement from 2022

Cabinet member: Cllr Pauline Church: Cabinet Member for Finance, Procurement, Commissioning, IT, Digital and Commercialisation

Key Decision: Key

Executive Summary

The council has undergone a process to assess the market for energy to ascertain the best method for procuring electricity and gas once the current arrangement expires on 31st March 2022. As part of this assessment the key objectives were:

- Quality of service
- Cost
- Accuracy and verification of billing
- Access to green tariffs

Total spend through this contract is approximately £7.3m per annum. Over a 5 year term contract this spend would be £35m plus and it is therefore designated as being a key decision that needs to be approved by cabinet.

There is also a requirement for a management and administration service to be provided as part of the contract to minimise the resource burden on the council and deliver contract management savings.

The market assessment exercise reviewed the ability of all available public sector energy procurement frameworks to meet the council objectives. From initial desktop exercises, 2 nationally recognised public sector frameworks were identified as having the capability and capacity to deliver the service, and both were further assessed on both quality and pricing methodologies to provide a recommendation for award. The result of this process is set out in part 2 of this report in the exempt part of the agenda.

Should this cabinet report be approved, it is proposed the new arrangement will be finalised by 30th September 2021 to allow the ensuring a successful transition period and allow the winning framework provider to begin the advance purchase of energy.

Proposal(s)

1. To approve the winning framework provider (as set out in part 2 of the report) as the method by which we purchase electricity and gas supply from 1st April 2022 for 5 years.
2. To delegate authority to the Director of Housing & Commercial Development, in consultation with the Cabinet Member for Finance, Procurement, Commissioning, IT, Digital and Commercialisation to proceed with award through the framework from 1st April 2022 for 3-year term.
3. Delegate authority to the Director of Housing & Commercial Development, in consultation with the with the Cabinet Member for Finance, Procurement, Commissioning, IT, Digital and Commercialisation, to utilise a 2-year extension option subject to adequate supplier performance and mutual agreement by both parties.

Reason for Proposal

The current energy purchasing arrangement expires on 31st March 2022 and needs to be replaced to enable the council to continue to deliver cost-effective electricity and gas supplies to the corporate, housing, streetlighting and school portfolios.

The strategy for purchasing energy has changed and developed over the previous iterations of this contract and has evolved from a fixed price model to a more flexible strategy that allows the council to cap budgets and return any savings achieved from lower prices directly back to the council.

The council's carbon reduction team have been involved in this process and contributed to the assessment process. As part of the options considered, the project team were able to discount the use of a single green supplier rather than a public sector framework provider. This is because the single supplier would be unable to deliver the managed service required or the price cap and savings potential that is possible with a public sector framework. However, it is hoped the length of this proposed arrangement may allow the market to develop so that the next iteration of this contract may be delivered with all the benefits of the framework as well as a 100% carbon neutral delivery mechanism. Considering the 2030 carbon neutral aim we would like to be in a wholly green contract by 2030 and therefore are committing to a 3+2 term so that, should a product be available by 2025, the council can take this up at the soonest possible opportunity.

This proposed arrangement builds on the flexible purchasing strategy with a budget cap, and also the option to purchase on green tariffs to align with the council's carbon neutral ambitions.

Public sector frameworks for energy have to date provided good value for money with the cost of the raw energy being very competitive as well as providing other

additional services such as billing validation, siteworks assistance, query management and access to billing through a web portal for sites. These enable the energy team to proactively manage energy on behalf of the council without the burden of liaison with energy suppliers and unnecessary administration.

The assessment process considered two public sector frameworks on the basis that these two were the only frameworks that met all the requirements for the effective management of the service including the budget cap and return of savings achieved through the duration of the arrangement. The assessment process robustly considered all quality aspects of the two frameworks, including the pricing mechanisms that would be in place for the duration of the arrangement to ensure the best possible value and service to the council.

The two frameworks considered both provide green electricity backed by Renewable Energy Generation of Origin Certificates (REGO's) that is generated by specific renewable technologies e.g. solar, wind, hydro power, and also non-green (brown) power.

Green gas is not currently purchased by the council as the cost uplift is significantly higher than that of green electricity. The amount of green gas available in the market is variable, depending on demand and current uptake as there is limited availability. However, the council is committed to continue monitoring the marketplace and reviewing this throughout any new contract.

It is anticipated that the market will mature and in future procurements the council will be able to have a wholly green supplier, offering the most rigorous type of green tariff, as well as all requirements met either through a supplier or a framework but at this time only a framework has been able to meet requirements and provide green electricity that is backed by REGOs.

Terence Herbert
Chief Executive

Wiltshire Council

Cabinet

29th June 2021

Subject: Electricity and Gas purchasing arrangement from 2022

Cabinet member: Cllr Pauline Church: Cabinet Member for Finance, Procurement, Commissioning, IT, Digital and Commercialisation

Key Decision: Key

Purpose of Report

1. To approve the winning provider framework as set out in part 2 of this report in the exempt part of the agenda as the method by which we purchase electricity and gas supply from 1st April 2022 for 5 years.
2. To delegate authority to the Director of Housing & Commercial Development, in consultation with the Cabinet Member for Finance, Procurement, Commissioning, IT, Digital and Commercialisation, to award the contract from April 2022 for 3-year term with a 2-year extension option.
3. To delegate authority to the Director of Housing & Commercial Development, in consultation with the Cabinet Member for Finance, Procurement, Commissioning, IT, Digital and Commercialisation, to extend the contract after year three if required.

Relevance to the Council's Business Plan

4. This energy purchasing strategy will ensure the council is efficient and provides good value for money for Wiltshire residents.
5. The option to purchase REGOs-backed, traceable electricity and gas demonstrates our innovative and effective council and contributes to the council's own carbon reduction.

Main Considerations for the Council

6. The specification of service requirements for the contract are laid out in appendix 1.
7. For the energy management service to run effectively there are several service requirements that can currently only be met through a public sector energy framework.

8. The winning framework provider has been assessed as being the best option for the council, being the highest quality score and delivering all additional services required including the green purchasing requirement.
9. The current contract is due to expire 31st March 2022 and a new contract needs to be agreed by September 2021 so that energy purchasing can begin in time for a contract start date of 1st April 2022.

Safeguarding Implications

10. There are no safeguarding implications.

Public Health Implications

11. There are no public health implications.

Corporate Procurement Implications

12. The options that were considered as part of this paper are all compliant with procurement regulations and Wiltshire Council procurement policy.
13. The recommended route to market is a framework that is publicly owned and focuses solely on energy and associated services for the public sector.
14. The framework provides a cost effective, trusted solution, to all public sector energy needs. The services include fully OJEU/FTS compliant frameworks for electricity and gas alongside key additional services to support council contract management and pricing monitoring and management.
15. The Sourcing Plan setting out all requirements and the options considered was submitted to Commercial Board on 18th March 2021. This paper was approved on the basis of further Commercial Board approval and Cabinet approval prior to award.

Equalities Impact of the Proposal

16. There are no equalities impacts for this proposal.

Environmental and Climate Change Considerations

17. The council's aim to be carbon neutral by 2030 has been considered as part of this procurement and the councils Climate Team has been consulted and support this recommendation.
18. Green electricity backed by REGOs and traceable by the supplier will be procured as part of this contract, and the council intends to explore similar options for green gas. This action means the electricity is zero carbon being made from traceable renewable sources and therefore means that it will

significantly decrease our carbon emissions, even though it does not increase our energy use. The additional requirements as part of the contract assist the council's energy team to run the contract effectively saving time and resource which can be put into carbon reduction programmes and reporting.

19. The council intends as part of this contract to provide green purchasing options to schools who use the contract, which further assists the carbon reduction work required to reduce the carbon impact of schools in Wiltshire.

Risk Assessment

20. The main risk to the council if this recommendation is not utilised would be the potential gap in service for a controlled and managed service and associated costs. If the council did not use a managed flexible capped arrangement, the council would have to use more volatile market dependent energy rates which would not benefit from the aggregation with the public sector framework, or the associated support services to ensure effective management and cost effectiveness.
21. They would also not be able to predict costs leading to ineffective budget management and potential unexpected future costs or budget overspend.
22. Furthermore, without a central arrangement to purchase through, service areas, particularly schools, may miss out on efficient processes and may incur additional costs to manage energy purchasing internally.
23. There is also a risk that the energy arrangements in place for the council will not be carbon neutral by the deadline of 2030 which is the council target. The arrangement duration and optional extension has therefore been carefully considered to ensure as soon as the market is fully capable of delivering these services in a carbon neutral way then the council will be able to utilise these methods in good time for the deadline to be met successfully.

Financial Implications

24. The requirements for this contract, as set out in appendix 1, save the council time and resource in contract management, and also contribute towards financial savings. For example, the current contract billing validation service has saved the council £214k in the last financial year, picking up billing anomalies and errors that may have gone unnoticed.
25. There is an uplift to purchasing green electricity at approx. 0.5% of the final cost, but the benefit of being able to declare this as carbon neutral is seen to outweigh this cost.
26. The council charges schools an administrative fee for schools to use the contract, so if a number of schools chose to not join in 2022 this income would reduce. However, this fee would usually include the cost of school query management so if there are less schools included in the final arrangement, there is less to manage, therefore should not be an increased cost.

27. The cost of energy is on an upward trend mainly due to government levies applied to grid costs that cannot be influenced by a supplier. This would be the case for any route to market chosen by the council. Having the proposed flexible budget cap addresses this as far as possible and manages the risk to the council.

Legal Implications

28. The proposal to procure through a public sector framework involves use of the framework terms and conditions rather than the standard council terms and conditions. For this reason, the council legal team have been involved in reviewing the proposed terms to ensure these are suitable and to include any additional Wiltshire specific terms and conditions as required. As the basis is still a public sector contract then the risk is considered low and has been operated under the current contract without issue.

Workforce Implications

29. There are no workforce implications.

Options Considered

30. Do nothing

The requirement for electricity and gas supply is still required and is vital for the operation of Council corporate buildings and housing estates. Should the council let this managed service lapse, the costs of energy would likely increase as it would be dependent on variable market rates. Also this would breach procurement regulations and internal council procurement policy due to the high value of the aggregated spend. This option is therefore discounted.

31. Open Procedure

This option would involve going to the whole market to request bids. This would be a resource intensive process due to the size of the market. It would also not target those suppliers who can deliver the exact service and benefits that public sector frameworks are proven to provide. The evaluation would also be high risk due to the difficulty in being able to consider like with like and the inability of the market to provide long-term cost-effective options. This option is therefore discounted.

32. Public Sector Framework

There exist multiple public sector frameworks specifically for provision of energy that are proven to provide additional value in support services and the ability to implement budget caps and return additional savings. These benefit from public sector aggregation of spend and years of experience in delivering services specifically to clients such as the council. Assessment has now been carried out which indicates a preferred framework provider who is proposed as the recommended framework to utilise to purchase future energy requirements. This framework is able to deliver the requirements including carbon neutral electricity and flexible budget cap. This option is therefore recommended.

Recommendation

33. The recommendation is to proceed with an arrangement with the proposed framework provider to purchase future energy requirements. This arrangement will have an initial duration of three years, with the option to extend up to a further two years to align with the council's carbon neutral agenda as well as the market's capacity to deliver to those targets.

Report Authors:

Louise Della Mura, FM Technical Lead, Housing and Commercial Development
Vivienne Sawyer, FM Delivery Manager, Housing and Commercial Development
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Appendix 1

Supply of Gas and Electricity for Wiltshire Council – Specification

1. Specification of requirements for gas and electricity contract

- a. Purchase energy requirements (electricity and gas) for all supplies requested (and any others added at a later date with reasonable notice) in a flexible arrangement, managing the risk strategy required for this, and monitoring usage levels as required.
- b. Provide a budget cap or known tariff rate for flexibly purchased energy that can be reconciled later in the year.
- c. Notification of this maximum tariff rate in advance of each financial year.
- d. Provide consolidated billing for corporate, streetlighting and housing supplies at an agreed frequency (e.g. monthly) that details usage, cost, tariff information etc in a format that can be imported into SystemsLink Energy Manager database for monitoring and Concerto asset management database for payment.
- e. Add an admin fee to billing for each portfolio of supplies as requested.
- f. Operate a customer services contact channel for sites and council energy team to utilise for billing or supply queries.
- g. Assist and manage siteworks queries from inception to completion, working directly with council staff and contractors, keeping the council informed of significant changes to supplies or issues arising.
- h. Validate all billing from the supplier ensuring bills are not passed for payment until accurate and be prepared to report on this.
- i. Attend (virtual or in person) contract meetings as and when required (quarterly or more frequently) and provide reporting at meetings showing progress against any agreed KPIs and discussing any issues.
- j. Monitor frequency of accurate billing and advise where readings may be required to assist billing.
- k. Offer an AMR service as required.
- l. Provide green REGO-backed electricity that is traceable to source showing the type of renewable investment and provide an option for green gas.
- m. Operate a web portal for sites and schools to access energy data and input meter readings or have the ability to use SystemsLink web portal managed by the council.
- n. Manage any additions/removals related to portfolio changes.

- o. Query management – being first point of contact for sites to discuss energy usage or billing issues.
- p. Ability to sleeve renewably generated energy through contract.

Schools Specific Requirement

- q. Invoice schools and academies separately to the main Council consolidated bill.
- r. Add on to invoices any admin fees from the council as required.
- s. Operate a customer services contact channel for schools/sites/energy team to utilise for billing or supply queries.
- t. Query management – being first point of contact for schools to discuss energy usage or billing issues.
- u. Assist and manage siteworks queries from inception to completion, working directly with council, contractors and schools, keeping the council informed of changes to supply.
- v. Contact schools with a newsletter or legislation guidance information as appropriate.
- w. Operate a web portal for schools to access energy data and input meter readings or have the ability to use SystemsLink web portal managed by the council.
- x. Provide quotations for any new school/academy supplies coming on contract mid-term and manage any additions/removals related to portfolio changes

By virtue of paragraph(s) 1,2,3,4,5,6a,6b,7 of Part 1 of Schedule 12A of the Local Government Act 1972.

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