

REVIEW OF KEY OUTSTANDING ISSUES RAISED THROUGH CONSULTATION ON THE WILTSHIRE CORE STRATEGY PRE-SUBMISSION DOCUMENT

1. Overview

- 1.1. This report provides a summary of the key issues that were raised during the consultation where officers do not consider a change to the strategy would be appropriate. The report begins with an overview of the some of the main issues which arose across the plan as a whole and sets out the reasons why officers do not consider changes are necessary in response to these issues. The later sections of the report provide a more detailed overview for each section of the Wiltshire Core Strategy Pre-submission Document. The report only focuses on the key issues raised for each part of the plan: it is not a complete list of all issues. A more detailed summary of issues raised is available in the completed consultation report. It is also worth noting that, whilst this report focuses on issues raised which have not resulted in changes being proposed by officers, some of the more detailed overviews presented in section 2 do also refer to issues where changes have been proposed in response to the representation. The overviews make it clear where this is the case. A list of all the changes proposed by officers is available in Appendix 1 to the Cabinet Report.
- 1.2. The consultation process on the Wiltshire core strategy pre-submission document has been successful and officers agree with a number of suggested changes to the plan to improve its clarity and implementation. However, the majority of representations received have not led to any proposed changes to the strategy. There are a number of reasons for this and some of the detailed comments are explained in the later sections of this report. In summary, it is considered that changes to the core strategy would not be justified in regard to many of the comments received for a range of reasons, including that; there is insufficient evidence to support a change, the issues raised are already covered by another area of the core strategy, and the lack of deliverability, including non-viability, of possible changes. Some examples of the headline objections that were raised to the plan and the reasons they have been set aside are provided below.
- 1.3. There have been a number of representations stating that the housing figures in the strategy are wrong. These are fairly evenly split between those parties who feel the growth levels are too low (predominantly house builders and planning agents) and those who consider the numbers too high (predominantly local residents). This is a common tension with plan making and is to be expected. Due regard has been given to all representations and it is considered that the housing numbers set out in the plan achieve the most appropriate balance taking account of the future needs of Wiltshire while respecting the environmental, social and economic characteristics of the area. The numbers are an appropriate target to help secure a viable future for our communities but proportionate to the capacity of the area to accommodate new housing in a sustainable manner. They are based on locally assessed evidence on need; a methodology already tested and found sound by an independent inspector through the South Wiltshire Core Strategy examination process.
- 1.4. Representations have been received questioning one of the core principles of the strategy, namely addressing the self-containment of our main settlements to improve their resilience and make them more sustainable. These representations state that we should accept out commuting and plan for less growth accordingly. The course of action proposed does not accord with national planning policy or the core vision of Wiltshire Council. It would lead to our main settlements providing a greater dormitory function and

thereby increase out-commuting in a manner not wanted by the local community and counter to the aims of achieving sustainable development.

- 1.5. A number of developers and planning agents have suggested that the core strategy is too restrictive, especially in the rural areas, where further relaxation of planning policy should be allowed to facilitate more development. However the Wiltshire core strategy defines what is considered sustainable development within the local context and also sets a framework for neighbourhoods to make their own decisions about how their communities should grow through neighbourhood planning. Relaxing this definition would lead to high levels of speculative development in our rural areas away from services and jobs.
- 1.6. A number of respondents have stated that the start of the 'plan period' should be recast to more accurately reflect current completion rates and that reserve / contingency sites should be identified to respond to potential shortfalls over the plan period. However, it is not unusual for the base date to precede the adoption date of a plan. Clearly, the council will continue to monitor such matters as completion rates to ensure that the overall evidence base remains current and up-to-date. The council does not consider there is a justifiable need to add 'contingency sites' into the plan. An element of windfall development has been accounted for; and, in overall terms, the plan is premised on a flexible and positive approach to development. The encouragement of the preparation of appropriate neighbourhood plans to address local development needs will also help address the issue of supply over the life of the plan.
- 1.7. There have been a number of representations regarding the strategy for Chippenham. Many have questioned the scale of growth in Chippenham and whether it accords with Government policy. Many consider that the level of growth will have unacceptable environmental and other impacts and that brownfield sites should be prioritised. A number of alternative sites have also been promoted around the town. The proposals for Chippenham are in accordance with the National Planning Policy Framework and the core principles for sustainable development. There are limited opportunities for the redevelopment of brownfield sites and it is therefore necessary to identify greenfield sites on the edge of the town. The evidence which underpins this is set out in the topic papers which were published alongside the pre-submission document, and in particular in topic paper 12: site selection process. The strategic sites at Chippenham will help achieve the overall objective of improved self-containment. There is no credible evidence to suggest that alternative options put forward for the growth of Chippenham are a better alternative to those in the Wiltshire core strategy.
- 1.8. A further common theme is that the Wiltshire core strategy is not ambitious enough with regard to tackling climate change, and that more stringent policies including requiring zero-carbon development should be included. These changes are not considered appropriate as in order to pass the tests of soundness the core strategy must be deliverable and ensure economic investment opportunities are viable. Evidence indicates that moving to extreme climate change measures will undermine the growth required to meet Wiltshire's needs.

2. **Summary of issues raised which have not led to proposed changes for each section of the core strategy**

- 2.1. The following paragraphs provide a summary of the main issues raised in relation to each section of the core strategy, and a summary comment to help explain the reasons why officers have not proposed changes to the strategy in response to these issues (*reasons are presented in italics*).

2.2. Introduction

- The introduction became the consultation point against which many comments on the consultation process were recorded. This included concerns about the consultation process in general and specifically a lack of clarity on what comments could be made. *It is considered that the consultation process undertaken was fully compliant with the regulations and the Wiltshire Council Statement of Community Involvement.*
- It was queried as to whether there really has been a bottom up approach to the generation of housing figures. *The justification for the housing figures is set out in topic paper 15 (housing requirement technical paper). A balanced approach has been taken, which takes account of community views but which is also in line with national policy and is based on evidence of likely future housing need.*
- Concern was raised that the strategy does not adequately address diminishing water resources. *Core policy 68 relates specifically to water resources. In addition, the core strategy has been subject to consultation with the Environment Agency and consultation with water companies has helped inform the Infrastructure Delivery Plan.*

2.3. Spatial portrait and spatial vision

- No key strategic issues were raised which have not either been addressed through proposed changes to the core strategy or have been covered elsewhere in this report.

2.4. Core policy 1: settlement strategy

- There was widespread support for the settlement strategy including representations from a number of neighbouring authorities, town and parish councils and developers. However a large number expressed preferences for minor changes in policy wording and/or approach.
- *There are no significant changes proposed to the settlement strategy. There was no substantial evidence offered that would require a change to the overall policy or any of the individual types of settlement identified.*

2.4.1. Individual settlements

- No new evidence was brought forward that would justify a change to the status of the majority of settlements. In those cases where a change is considered appropriate this has been identified in the list of proposed changes.
- There was strong support for Trowbridge and Salisbury being identified as Principal Settlements.
- There was some support for designation of Chippenham as a Principal Settlement however a number of comments were opposed for reasons including:
 - Designation perpetuating artificially imposed policy by the Regional Spatial Strategy, in direct contradiction to Chippenham residents' expressed desire.
 - Chippenham has been, and still is a "Market Town". Its saving grace is its beautiful, rural aspect which improves the quality of life.
 - Chippenham cannot support more traffic congestion and further parking problems.

It is considered that Chippenham should continue to be identified as a Principal Settlement, as in the pre-submission document, as this reflects the role and function of the town.

- There was support for the majority of Market Towns.

- Comments from developers highlighted some settlements as having a need for their role in the strategy to be strengthened, i.e. that they should be at a higher level in the settlement strategy. Those settlements were Devizes, Warminster, Pewsey and Purton. *Officers have considered these comments and the evidence available, and it is considered that the classification of these settlements should remain as set out in the pre-submission document.*
- A number of minor centres were mentioned either with support or with suggested changes. This included comments from parish councils and developers. There was support for the classifications of Mere, Chilton Foliat, Lydiard Tregoz and Hullavington. Changes were proposed to the classification of Market Lavington, Bowerhill, Easterton and Etchilhampton. The suggestions were that Easterton should be identified as a large village, that Etchilhampton should not be identified as a small village, that Bowerhill should be identified as a separate settlement rather than being included with Melksham, and that the relationship between Market Lavington and nearby settlements should be considered. *After consideration of the comments and the evidence available, it is considered that the classification of these settlements should remain as set out in the pre-submission document.*

2.4.2. Small settlements/villages

- The majority of comments regarding the policy at villages/small settlements were from agents and landowners who felt that the policy was overly restrictive. It was contended that this would lead to a stagnation of rural life affecting the viability of these communities. The majority of comments from parishes and individuals either supported or argued that the policy was ambiguous. *Core policy 1 has identified over 70 rural settlements where there is an expectation of development to support housing, employment and facilities in rural areas. It is considered that this is a positive policy approach that allows appropriate development to come forward within these settlements and the core strategy also includes flexibility for certain types of development, such as affordable housing, to come forward outside these settlements.*
- It was suggested that the council needs to prove through the Strategic Housing Land Availability Assessment that there is capacity for infill development at the small settlements. There were also requests for changes to the policy relating to specific sites. *Changes are not considered necessary in response to these comments. Sites outside the settlements can be identified as appropriate through a neighbourhood plan or a site allocations development plan document, and the core strategy also includes flexibility for certain types of development to come forward outside the settlements. The council will monitor housing delivery and can take steps to rectify the situation (for example through a future planning policy document) if there is difficulty with the supply of infill sites. This is recognised in the Council's Local Development Scheme.*

2.4.3. Settlement boundaries

- Support for the retention of settlement boundaries at small villages came from parishes and some individuals. However, this was again outweighed by developers, agents and other organisations, arguing that settlement boundaries impose limits on development and should either be removed or redrawn, or policy should be amended to allow development outside boundaries. *The policy mechanism in core policies 1 and 2 will ensure that the right development is correctly located. The task of redrawing or creating new boundaries is unachievable as it would require a level of consultation more suited to neighbourhood plans or development plan documents. To retain boundaries at small settlements would leave an inconsistent policy approach across Wiltshire. Amending boundaries or allowing development outside boundaries*

is unnecessary as the policy approach provides a clear delivery mechanism through neighbourhood planning or a future site allocations development plan document. Furthermore, as stated above, the core strategy includes flexibility to allow certain types of appropriate development to come forward outside settlement boundaries.

2.4.4. Relationship with Swindon

- Developers are promoting the inclusion of (west of) Swindon as a 'settlement' in Core Policy 1. This is neither supported by the community beyond developers nor considered necessary. *Swindon is rightly acknowledged as a major centre on the edge of Wiltshire in the spatial portrait and providing a categorisation of a non-existent settlement is artificial and would be contrary to the principles of core policy 1.*

2.5. Core policy 2: delivery strategy

2.5.1. The plan period

- There were many responses suggesting that the plan period should be extended to at least a 15 year timeframe. This issue was also raised throughout the community area strategies. *The existing time frame accords to the National Planning Policy Framework, which only refers to a 15 year plan period being preferable, and there is therefore no requirement to extend this.*

2.5.2. The housing requirement

- The issue was raised that the housing requirement does not provide sufficient flexibility to respond to change. This issue was raised throughout the community area strategies. *However the requirement provides a minimum level for growth which taken in conjunction with the support of neighbourhood plans, and the potential for policy review, provides more than sufficient flexibility to respond to the market and other changes.*
- It was argued that the housing requirement does not significantly boost the supply of housing. *The housing requirement based on objectively assessed evidence is higher than the previous Structure Plan and plans for a significant level of housing. Significant strategic housing allocations are proposed within the plan that will boost supply.*
- Respondents proposed that the housing requirement should at least accord with the CLG household projections, other economic projections or with other housing projections undertaken by respondents. *This approach of adhering to trends does not conform with the requirement of the National Planning Policy Framework to objectively assess the requirement for housing and to meet that need as far as is consistent with the policies set out in the Framework. Wiltshire Council have carried out a full objective assessment of need through topic paper 15 (housing requirement technical paper).*
- Respondents identified that the housing requirement was not great enough to provide the identified level of affordable housing within the Strategic Housing Market Assessment. *However, it can be demonstrated that the core strategy will deliver the majority of homes to meet the identified need, thus optimising delivery of affordable housing.*
- There is concern at where the sub-regional housing requirement will be met given that neighbouring authorities and Wiltshire have decreased their housing requirement. *The reductions have reflected the economic decline, which has resulted in an actual decline in the housing requirement across the UK.*
- Given that the Regional Spatial Strategy proposed changes are the most recently examined housing requirements, it was argued that these should be maintained. *This*

- negates more up to date evidence and would be wholly unjustifiable. Approach to housing supply in Wiltshire tested through the South Wiltshire Core Strategy examination and was found to be sound. It is therefore up to date evidence.*
- Wiltshire has capacity for a higher level of dwellings but the core strategy is not planning to deliver this many. *The core strategy is seeking to deliver a sustainable level of homes consistent with the overall Strategy of the plan rather than building to capacity.*
 - Respondents argued that the housing requirement is dependent upon commuting flows changing, which is unrealistic. *This has been considered in topic paper 15 and by considering the make-up of the labour force this can be demonstrated to be realistic.*
 - It was raised that infrastructure was already over-burdened and could not cope with additional housing. *Positive steps are being taken to address infrastructure provision through the Infrastructure Delivery Plan in conjunction with the core strategy.*
 - Several respondents suggested that there was no justification for the housing requirement. *The justification is set out in full in topic paper 15.*

2.5.3. The distribution of the housing requirement

- The use of Housing Market Areas (HMAs) was questioned. *However this is in conformity with the National Planning Policy Framework.*
- It was identified that the change of housing requirements compared to that in Wiltshire 2026 is not consistent across the area. *This is a result of detailed analysis being undertaken of the issues and opportunities for each area and appropriate levels are proposed to address these.*
- Some respondents felt that the distribution of the housing requirement was too restrictive. *However, by assessing land supply across Housing Market Areas this provides flexibility to deliver in a timely manner at appropriate locations whilst also providing some certainty for areas as to the levels of growth they can expect.*

2.5.4. Phasing

- Respondents argued that the delivery of employment should be forthcoming prior to housing. *This is supported within the strategy (including the need to manage the delivery of development on mixed use strategic sites) but there is no clear evidence to justify the need to constrain the overall housing requirement through phasing over the plan period.*
- It was also argued that a policy should exist that ensures that housing delivery is appropriately phased. *However, the same argument applies, as set out above.*

2.5.5. Employment land requirement

- It was suggested that the employment land requirement should be amended to be a minimum in accordance with the housing requirement. *However, this is not supported by evidence and the requirement is already ambitious offering flexibility and choice.*

2.5.6. Brownfield development

- It was argued that brownfield development outside of the settlement framework should be supported. *The plan supports the development of brownfield sites in sustainable locations and includes a specific policy in relation to MoD sites, which are generally outside settlement frameworks..*
- Respondents argued that there should be a mechanism to prioritise brownfield development to meet the identified target. *The National Planning Policy Framework*

does not seek to prioritise but rather seeks opportunities to bring forward brownfield development. Furthermore, such an approach would be unenforceable.

- Respondents argued that the brownfield target should be increased or decreased. *The target set in the plan is considered to be reasonable and supported by evidence in the SHLAA. No additional evidence was provided to support increasing this target.*

2.5.7. Delivery of development

- Respondents wanted further clarity on how additional sites will be brought forward. *Core policy 2 provides clarity on where development will be supported, and identifies the mechanisms by which further sites will be brought forward. Further clarity cannot be provided until the need for these is determined.*

2.6. Core policy 3: infrastructure requirements

2.6.1. Prioritisation

- There were some requests for certain types of infrastructure, e.g. open space and green infrastructure, to be listed under essential infrastructure and not place-shaping. *However, the order of prioritisation refers to the timing of provision and not the relative importance of different types of infrastructure. Also, some types of infrastructure may provide multiple benefits.*
- There was criticism that the prioritisation of 'essential' and 'place-shaping' infrastructure is too general an approach. *However, this is applied to individual community areas in the Infrastructure Delivery Plan and the specific needs of these areas/sites are identified.*
- There were requests that a full definition of 'essential' and 'place-shaping' infrastructure should be provided. *An explanation is set out in the supporting text to core policy 3. More detail is provided in the accompanying Infrastructure Delivery Plan.*

2.6.2. Payment of developer contributions

- There were requests for developer contributions to be payable so as to allow the provision of infrastructure in stages alongside development, not prior to development taking place. *However, some infrastructure needs to be provided and paid for before development takes place (e.g. utilities, access roads etc.) and, in any case, the policy requires contributions 'prior to, or in conjunction with' development.*
- Some responses commented that core policy 3 should recognise that, in some cases, a scheme will be unable to pay for all the required infrastructure even if payments are deferred to a later date. Other responses commented that planning permission itself should be deferred until the developer can afford to pay for all of the necessary infrastructure without the option to defer payments. *However, core policy 3 needs to provide a balance between ensuring the necessary infrastructure is in place to support development and not unduly putting development at risk.*

2.6.3. Community involvement

- Some responses requested a firmer indication of the level of Community Infrastructure Levy (CIL) to be set and for the Infrastructure Delivery Plan for each community area to be fully costed and delivery partners made aware of the implications in each area. *However, the level of Community Infrastructure Levy to be set will need to be based upon viability evidence and not policy requirement. This viability evidence will support the establishment of a Community Infrastructure Levy*

charging schedule. The Infrastructure Delivery Plan is based on the best available evidence and will be updated and reviewed as further evidence comes to light. Delivery partners were involved in and supplied information contained within the Infrastructure Delivery Plan.

2.6.4. Planning obligations/Community infrastructure levy

- Some responses requested that the guidance note on planning obligations and the Community Infrastructure Levy charging schedule should be in place alongside the submitted core strategy. *However, the charging schedule and interim guidance note/ supplementary planning document on planning obligations are programmed for adoption following the core strategy and will provide further guidance on the application of core policy 3.*

2.7. Community area strategies

2.7.1. Amesbury

- Detailed comments were received on the wording of CP6 (Stonehenge). *Officers agree that two changes should be made, but the remainder of the comments are not accepted as they do not affect the soundness of the plan.*
- There was concern that the evidence base supporting changes to Amesbury is limited through reliance on previous planning effort focused on Salisbury.
- Amesbury Town Council are concerned that the housing sought in Kings Gate area may require balancing growth in retail, road, education and leisure facilities.
- Promoters for Solstice Park argued that the Principal Employment Areas should be shown on the proposals map and that the previous local plan employment allocation at Solstice Park should be saved.
- It was suggested that the bullet points in relation to Salisbury Plain Special Protection Area and the River Avon Special Area of Conservation are not in line with the Habitats Directive and changes to the text were suggested *The consultation responses regarding the proposals for the Amesbury community area did not raise any issues or present any new evidence which would undermine the soundness of the core strategy. The strategy and text for Amesbury was incorporated into the Wiltshire Core Strategy from the adopted South Wiltshire Core Strategy (SWCS). There were some minor changes made to ensure the effective amalgamation into the wider document. However the amended text is a reflection of the SWCS and the binding inspectors report. It continues to be the case that officers are of the opinion that the proposals within Core Policy 4 continue to be justified, effective and in accordance with the NPPF. A few minor changes to the text have been proposed to improve the clarity of the area strategy, and these proposed changes are listed in Appendix 1 to report CM09395.*

2.7.2. Bradford-on-Avon

- Two alternative strategic sites were suggested by the development industry: Land North of Holt Road and Land at Bradford on Avon Golf Course. *Both sites have already been considered through the site selection process set out in Topic Paper 12 and as a result of the evidence available are not considered to be the preferred location for growth.*
- There was a suggestion that an alternative area should be identified for the Holt 'area of opportunity'. *There is insufficient evidence to justify any change to the Holt 'area of opportunity'. The plan is already considered sound without the suggested changes and the proposed amendments would not improve the clarity of the core strategy.*

- The promoters of the Kingston Farm site requested a number of changes to the development template, including changes to the level of employment land to be provided and the removal of the indicative green space. *The spatial strategy recognises the importance of delivering new jobs and infrastructure alongside future housing delivery. Therefore it is considered inappropriate to amend the site requirements in the core strategy.*

2.7.3. Calne

- Some comments including from the development industry called for a higher housing requirement for the area. *The housing requirement for Calne is sound and provides a minimum figure for development. The Core Strategy establishes a framework to allow development above and beyond the requirement to be explored through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocations DPD.*
- Three sites for development were put forward for development: Land at High Penn, Land at Oxford Road and Land off Castle Walk. The developer promoting Land off Castle Walk also requested that the settlement boundary be redefined to include the site. *The Core Strategy establishes a framework to allow sites to be explored and identified through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocation DPD.*
- There was a suggestion that a direction of growth should be identified and that a site should be identified to meet the needs of elderly care provision. *Wiltshire has an ageing population and Core Policy 46 seeks to address the needs of Wiltshire's ageing population by setting out the requirements to be taken into account when planning for new housing. This includes, for example, ensuring there is adequate provision of specialist accommodation, such as extra care housing. Therefore it is not considered necessary to identify specific sites. However, consideration could be given to allocating specific sites for development through the neighbourhood planning process, or a site allocation development plan document if appropriate.*
- It was suggested that a rural buffer should be identified to the east of Chippenham. *The identification of a rural buffer is not considered necessary. The Core Strategy acknowledges Wiltshire's rich and diverse natural, historic and built environment and sets out steps which as far as possible also protects and enhances them including Core Policy 51 Landscape which seeks to enhance Wiltshire's distinctive landscape character.*
- It was suggested that there is a qualitative need for convenience retail within Calne. *The evidence set out in the Topic Papers underpinning the retail policies has included both qualitative and quantitative assessment of retail needs. It is not considered necessary to identify specific sites at this time. It is appropriate for this matter to be considered through the emerging Neighbourhood Planning process or other planning mechanism. A proposed review of the core strategy will consider the need to allocate specific sites for retail development.*

2.7.4. Chippenham

Core Policy 9

- Bath Road/Bridge Centre Site – It was suggested that the statement in CP9 that the Bath Road/Bridge Centre Site will 'provide a supermarket and comparison units' should be deleted. *This text relates to the delivery of Bath Road Car Park/Bridge Centre site for a retail extension to the town. It is not appropriate to delete the text because this has been identified as a key site through the evidence base.*

Core Policy 10

- Comments from the development industry called for a higher housing requirement whilst comments from the local community called for a lower housing requirement. *The housing requirement for Chippenham is considered to be sound and is justified as a result of evidence set out in the Topic Papers.*
- Some responses from the local community objected to the level of employment land proposed for Chippenham on the basis that is unrealistically high and does not bear scrutiny or meet the needs of the Chippenham community. *The proposed level of employment land is necessary in order to ensure existing larger employers can be retained and new employers catered for at Chippenham.*
- Some responses say there has been a lack of consideration of brownfield opportunities in the town and the site selection is not in accordance with 'brownfield first' criteria set out in national policy. *Brownfield opportunities have been considered as part of the site selection process for Chippenham set out in topic paper 12. Given the limited opportunities for the redevelopment of brownfield sites in Chippenham, it is necessary to identify greenfield sites on the edge of the town.*
- Some responses have been made specifically about the identification of Showell Farm Employment Site, that the evidence, particularly concerning out-commuting, which has led to its selection is outdated, incomplete and contradictory and that the site isn't viable and there is no certainty that it will be developed as an employment site by the developers, particularly as a firm who were considering relocating to the site have now chosen to relocate to Melksham instead. *The evidence leading to the site selection is set out in Topic Paper 12. To accept out-commuting and not plan to improve the self-containment of the town will lead to the further decline of Chippenham contrary to the strategy for Wiltshire. Developers promoting the site have submitted representations supporting its allocation and have previously provided evidence to confirm that they are committed to the delivery of the site as an employment site. Therefore there is no new evidence to justify the removal of Showell Farm as a strategic employment allocation as part of the South West Chippenham Strategic Site from the Core Strategy.*
- Some responses have suggested that alternative sites for employment, are far more suitable for employment, but have been dismissed too easily without detailed consideration e.g. Junction 17, M4. *Evidence leading to the identification of employment sites is set out in the topic papers. The employment sites now proposed at Chippenham offer the best opportunity to achieve the strategy for the town, which is based on delivering significant job growth which will help to improve self containment.*
- Some responses from the local community and developers promoting alternative sites have suggested the South West Chippenham Strategic site does not comply with the NPPF requirement to be positive and promote a town centre environment, particularly because the South West Strategic site will lead to residents shopping out-of-town and will exacerbate rather than alleviate town centre traffic. *It is acknowledged that the area is closer to out-of town facilities along Bath Road, but it is not considered that this reason should prevent the South West Area of Search site being allocated as a strategic site. The site will still contribute to achieving the strategy for Chippenham. It includes employment and housing, will be well integrated with the town and therefore will help to improve the self-containment of Chippenham.*
- Some responses including from English Heritage have been made suggesting that development at Rawlings Green and South West Chippenham could harm the significance of heritage assets and would be contrary to the NPPF. *The proposed landscaping measures and masterplanning for the site, including appropriate uses for the sites, will address these concerns.*
- Some responses continued to object to the strategic sites identified in Core Policy 10:

- Alternative strategic sites have been promoted by the development industry. These include Barrow Farm; Forest Farm; East Chippenham; Hunters Moon and Saltersford Lane. Some responses from the local community were opposed to the three strategic sites particularly in terms of the detrimental effect on Birds Marsh Wood; Lacock parish and village; and Monkton Park/Station Hill area.
- Monkton Park Residents Group suggested that Rawlings Green be removed and replaced with Hunters Moon.
- Responses from Chippenham Vision Board and Chamber of Commerce objected to the inclusion of South West Chippenham Strategic Site, requested it be removed and for the East Chippenham site to be reinstated or alternatively that the North Chippenham and Rawlings Green strategic sites remain allocated as strategic sites, but that the location of the remaining 800 dwellings and employment land should be decided either through a Neighbourhood Plan process or as part of the Chippenham Masterplan work which is currently underway.

At this stage new evidence has not been presented to suggest the strategic sites proposed for Chippenham should be amended or that based on the evidence available any one site or number of sites offer better alternatives to the three strategic sites proposed in the Core Strategy. Chippenham is identified as a Principal Settlement in Wiltshire and development including infrastructure provision at Chippenham should be planned for in a holistic manner rather than on a piecemeal basis.

- Some responses from the development industry requested the removal of Land South West of Abbeyfield School because it is a non strategic site. *Although this is a small site compared to the other strategic sites at the town, it will contribute to meeting the strategic housing land requirement for Chippenham early in the plan period and will provide an opportunity to develop employment land and facilitate links between business and Abbeyfield School helping to ensure that young people can remain in Wiltshire. Therefore this site should remain identified in the Core Strategy.*
- Support has been expressed by the local community in Tytherton Lucas for the removal of the East Chippenham site, with the request that the area be formally designated as rural buffer/open space. *The identification of a rural buffer is not considered necessary. The Core Strategy acknowledges Wiltshire's rich and diverse natural, historic and built environment and sets out steps which as far as possible also protects and enhances them including Core Policy 51 Landscape which seeks to enhance Wiltshire's distinctive landscape character.*
- Many of the responses from the local community and developers promoting alternative sites expressed concern over the Chippenham Transport Strategy and the lack of evidence to inform the proposals for Chippenham. Developers promoting sites have provided their own transport modelling evidence. *To delay site selection until such time as there is more detailed transport modelling available is not appropriate. New evidence has not been provided at this stage to suggest that the strategic sites should be amended. The site selection process set out in topic paper 12 has considered a range of evidence including but not limited to the transport strategy work.*
- Some responses including from Chippenham Town Council stressed the importance of ensuring appropriate infrastructure is planned for and delivered alongside housing and employment. *Other policies elsewhere in the Core Strategy including Core Policy 3 and the specific requirements set out in the strategic site development templates will ensure that infrastructure is provided alongside further housing and employment.*

2.7.5. Corsham

- The significant issue raised involved the South West Chippenham strategic site not being referenced in the text or development figures for the Corsham Community Area. *It is considered that amendments to the text should be included as a minor change, but that the site should not be included in the figures for Corsham. The development planned for Chippenham serves that community.*
- A number of sites were promoted for inclusion in the core strategy by the development industry. *The housing requirement for Corsham is sound and provides a minimum figure for development. The Core Strategy establishes a framework to allow sites to be explored and identified through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocations DPD.*

2.7.6. Devizes

- Comments from the development industry called for a higher housing requirement for the area. It was also suggested that there is a lack of a 5 year housing land supply in the Eastern Housing Market Area. It was suggested that named strategic sites at Coate Bridge and Lay Wood/Horton Road should be allocated. *The housing requirement for Devizes is sound and provides a minimum figure for development. The Core Strategy establishes a framework to allow sites to be explored and identified through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocations DPD.*
- Worton do not wish to be identified as a large village. The parish consider that they do not have the facilities to support this designation. *The council have applied a consistent test to all villages across the council area and consider, regardless of population, the facilities do exist to support the proposed designation.*

2.7.7. Malmesbury

- Comments called for either a higher or lower housing requirement for the area. *The housing requirement for Malmesbury is considered to be sound and provides a minimum figure for development. The Core Strategy establishes a framework to allow development above and beyond the requirement to be explored through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocations DPD.*
- There was a suggestion the housing requirement should not be set or delivered until it is ensured primary school places can be provided. It was also suggested that it should be made clear that greenfield sites will be required to deliver housing in the rest of the community area and that at the identified Large Villages sites of 1 hectare on the edge of the village boundaries should be allowed. Land at Park Road, Malmesbury was put forward by the developers promoting the site. *The housing requirement and specific non strategic sites will be delivered through the neighbourhood planning process or a site allocations document and primary school provision will be addressed through those processes.*
- It was suggested that the extant North Wiltshire Local Plan employment allocation on land at the Garden Centre should be removed. *The evidence set out in the Topic Papers indicates that this allocation is deliverable and is a suitable site for employment use necessary to deliver the strategy for Malmesbury.*
- It was suggested a town centre study should be carried out. *If required this can be carried through the neighbourhood planning process or an alternative mechanism.*

2.7.8. Marlborough

- General objections to the amount of development and the strategic site revolved around environmental issues. Air quality was raised as development may lead to breaches of the mandatory limits set by European Directive. Other concerns included the declining condition of the River Kennet and impact on nearby Savernake Forest SSSI. *However, these concerns are covered by Core Policy 55: Air Quality and the Habitat Regulations Assessment (HRA) respectively, which ensure that these are taken into account when development at Marlborough is brought forward.*
- It was suggested that Marlborough's role as a centre of education and tourism presents a case for reinstatement of former railway from Savernake to Marlborough. *Currently rail reinstatement is unlikely due to lack of funding and priorities on the rail network. The Core Strategy should be realistic and infrastructure capable to be delivered.*

2.7.9. Melksham

- Melksham Town Council expressed concerns that the lack of a strategic site could leave Melksham vulnerable to developers. Melksham Without Parish Council and Hallam Land Management suggested strategic sites for inclusion. *A strategic site is not considered appropriate at Melksham as explained in the site selection process topic paper. Although Melksham Without Parish Council and Hallam Land Management have both suggested that a site should be identified to the south of the existing east Melksham development, there is disagreement as to the scale of development. Sites can be identified through neighbourhood planning or a site allocations DPD.*
- There was a suggestion that Upside Park should not be identified as a Principal Employment Area because it is unsuitable for purely employment development. *It is considered that this site should remain as a Principal Employment Area as it previously had planning permission for employment uses.*
- There was concern that the rural buffer between Melksham and Bowerhill should be protected. *Core Policy 2 indicates that development will not be supported outside settlement boundaries unless it is identified through a neighbourhood plan or a future development plan document.*
- A concern was raised that core policy 15 does not cover the economic and social needs of the whole community area, particularly the villages. *Core policies 34, 48 and 49 cover these issues.*
- There was concern at the identification of Seend and Seend Cleeve as separate settlements. *Seend and Seend Cleeve are considered separately in current planning policy (in the Kennet Local Plan) and it is considered appropriate to continue to deal with these settlements separately for planning policy purposes.*
- There was concern at the identification of Bowerhill as part of Melksham. *It is considered that Melksham and Bowerhill operate effectively as one functional urban area and should be planned for together.*

2.7.10. Mere

- There was support from a developer on Core Policy 17, with a potential site put forward to accommodate the remainder of development identified. *This can be considered by the community through a neighbourhood planning process, or can be considered through a site allocations DPD.*

2.7.11. Pewsey

- A number of sites were promoted by the development industry including Land adjacent Salisbury Road, Pewsey and the low amount of development was challenged. *The housing requirement for Pewsey is considered to be sound and provides a minimum figure for development. The Core Strategy establishes a framework to allow development above and beyond the requirement and specific sites to be explored through an alternative mechanism such as either the neighbourhood plan process or a subsequent sites allocations DPD.*

2.7.12. Royal Wootton Bassett and Cricklade Area Strategy

- Strategic sites were promoted at Brynard's Hill and an undefined area 'south of Wootton Bassett'. *A strategic site is not considered appropriate as explained in topic paper 12. The housing requirement will be delivered through the neighbourhood planning process or a site allocations document.*
- It was suggested that 3,000 dwellings should be allocated to the west of Swindon and that strategic sites should be identified to the west of Swindon. *Historically it has been proposed that part of Swindon's housing need be met in an area to the west of Swindon within Wiltshire. The level of growth for Swindon as evidenced through the emerging Swindon Core Strategy means that there is no longer a need for this development as other alternatives exist.*
- The development industry has noted that there is a qualitative need for convenience retail. *The evidence set out in the Topic Papers underpinning the retail policies has included both qualitative and quantitative assessment of retail needs. It is not considered necessary to identify specific sites at this time. It is appropriate for this matter to be considered through the emerging Neighbourhood Planning process or other planning mechanism. A proposed review of the core strategy will consider the need to allocate specific sites for retail development*
- Local residents and Parish comments raised the bringing back the 'rural buffer' and the need to preserve the identity of settlements located close to Swindon. *CP51 (landscape) requires proposals to demonstrate that the locally distinctive character of settlements has been considered, and CP1 (settlement strategy) and CP2 (delivery strategy) provide protection against coalescence. The issue of the rural buffer could be considered further through the preparation of a neighbourhood plan.*

2.7.13. Salisbury

- The following issues were raised during the consultation in relation to the Salisbury community area:
 - Laverstock and Ford Parish council are concerned that there is too much development in the parish and are also seeking the deletion of Core Policy 23.
 - There was also Support for Maltings/CCP redevelopment.
 - There were also comments about the Salisbury Vision, some in support and others questioning some of the sites deliverability.
- *These matters were recently examined as part of the South Wiltshire Core Strategy and no new evidence has arisen to depart from the Inspectors conclusions and the comments do not necessitate any changes to the core strategy*

2.7.14. Southern Wiltshire

- The main issue in this community area was concern that the bullet points are not in line with the Habitats Directive, and suggested re-wording was put forward. *However, this is not confirmed by the HRA and therefore the suggested change is not required.*

2.7.15. Tidworth

- There is some challenge by developers regarding the amount of development being proposed. They felt this was not commensurate with the settlements size and facilities and that growth should be located elsewhere. *The policy for Tidworth and Ludgershall has been developed over a number of years in consultation with local community. The level of growth and diversification of the economy will continue to form an important part of military civilian integration work and help form a sustainable community in the Tidworth community area..*

2.7.16. Tisbury

- There was support for balance of housing directed towards Tisbury Community Area.
- A developer suggested that Hindon could potentially accommodate a higher level of planned housing growth than Fovant or Ludwell, and that a housing allocation should be identified at Hindon, and could include land adjacent to East Street.
- *Issues relating to Tisbury were recently examined as part of the South Wiltshire Core Strategy and no new evidence has arisen to depart from the Inspectors conclusions and the comments do not necessitate any changes to the core strategy.*

2.7.17. Trowbridge

- A number of consultees, particularly residents, felt that too much development is planned on Greenfield land and that previously developed land (pdl) should be used first for housing not for commercial uses. *Pdl opportunities have been considered as part of the site selection process for Trowbridge but there are insufficient opportunities to provide the housing necessary to support Trowbridge over the pan period when other town centre uses are considered. It is, therefore, necessary to consider both brownfield and Greenfield sites to meet the housing requirement and to allow flexibility on town centre sites to ensure there is a mix of uses for sites.*
- Residents, community groups and developers identified issues with a single strategic allocation, in an area of high flood risk and constrained by other environmental designations, is not the most appropriate spatial strategy for the community area. It was also suggested that there is insufficient flexibility to deliver a continuous supply of housing land in Trowbridge and that it would be better to identify a number of smaller strategic sites on the edge of the urban area, such as land at Church Lane. *Site selection evidence set out in topic paper 12 has led to the identification of a single strategic allocation. Regard has been had to constraints and the development templates include appropriate landscaping and mitigation measures to ensure.*
- A number of comments questioned the consideration given to the impact upon the strategic road network, particularly the A36, of development at Trowbridge. It was stated in the Transport Strategy that increases to the capacity of the Ashton Park junction can be satisfactorily carried out without creating fresh capacity problems at junctions immediately beyond. It was therefore suggested that the proposals are unsound in their present form and need to be reduced in scale to reflect the existing and proposed highways infrastructure capacity. *Trowbridge Transport Strategy work is ongoing and will include considering mitigation measures and improvements beyond the strategic site.*

- The development industry has noted that there is a qualitative need for convenience retail. *The evidence set out in the Topic Papers underpinning the retail policies has included both qualitative and quantitative assessment of retail needs. It is not considered necessary to identify specific sites at this time. It is appropriate for this matter to be considered through the emerging Neighbourhood Planning process or other planning mechanism. A proposed review of the core strategy will consider the need to allocate specific sites for retail development.*

2.7.18. Warminster

- It was suggested that the wording of the paragraph and bullet points is not in line with the legal requirement of the Habitats Directive. *It is not considered that any change to the text is necessary as the Habitats Regulations Assessment supporting the Wiltshire Core Strategy shows the plan to be compliant with the EU Habitats Regulations.*
- Developers queried why a number of sites were not included in the strategic site. These included sites at 44-48 Bath Rd, land east of Dene and the existence of more sustainable locations, closer to Warminster town centre. *Topic paper 12 sets out the evidence supporting the West Warminster Strategic Extension to be the most appropriate site at Warminster.*
- A number of comments suggested that various types of infrastructure in Warminster, including roads, schools and water resources, will be unable to cope with the amount of development proposed. *It is not considered that any changes are necessary as the Infrastructure Delivery Plan and development proformas identify that either there is infrastructure capacity or where developers will be required to provide additional infrastructure.*
- A number of developers have suggested that the overall level of housing for Warminster is insufficient, and therefore, more will need to be identified. *The evidence to support the housing allocation is set out in topic paper 15, the figure for Warminster is considered robust and supported by evidence.*

2.7.19. Westbury

- The major issue related to the strategic allocation at 'Land at Station Road, Westbury'. The developers have stated that the site is unviable with 250 houses because this will not deliver all the required infrastructure improvements. They argue that the number of houses should be increased to 500 and the site expanded to include other land within Persimmon's control on the other side of the railway line (around the Penleigh Farm area). *It is not considered appropriate to change the site at this stage as the expanded site does not have sufficient evidence and has not undergone any consultation. If appropriate, an expanded site could be taken forward through a neighbourhood plan or a site allocations development plan document in the future.*
- The other most requested changes involved the need for greater protection for the Wellhead Valley and the removal of Saved Policy T1a Westbury Bypass. *The Wellhead Valley is currently protected as a Special Landscape Area (SLA) under Saved Policy C3. There will be a review of SLAs to determine sites that should retain this protection.*

2.7.20. Wilton

- *No significant issues were raised.*

2.8. Delivering the strategic objectives: SO1: Delivering a thriving economy

2.8.1. Core policy 34: Additional employment land

- It was strongly recommended that criterion viii (to not undermine strategic sites) is removed from Core Policy 34 as there is no basis and other large sites may be needed for a flexible approach that responds to market demands. *This is not considered appropriate as it is important that proposals coming forward through this policy are not of such a scale that they undermine the overall employment strategy and important employment sites either allocated or identified as principal employment sites.*
- It was suggested that sustainable development should be judged against NPPF criteria of sustainability (and not the objectives set out in the core strategy, as indicated by criterion v). *The core strategy clearly defines sustainable development in a Wiltshire context as prescribed by the NPPF and this is the criteria that the policy should be assessed against.*
- AONB management teams and other respondents that Core Policy 34 (additional employment land) should make reference to AONB policy. *This is not considered necessary as criterion v clearly states that 'the proposal must meet sustainable development objectives as set out in the policies of this core strategy'. This includes meeting the requirements of CP51 (landscape) which makes specific reference to the AONBs.*
- It was suggested that the policy lacks clarity and that there is no definition of what 'within principal settlements' means as settlement boundaries reflect residential development and not economic development. *The settlement strategy that identifies principal settlements and has been informed by a range of evidence and data including evidence with respect to jobs. The settlement boundaries referred to are those set out in the current district/local plans.*
- Individuals felt that core policy 34 represents a 'get out of jail free' card for developers, and that the wording should be changed to stop developers putting forward repeated planning applications on employment land for other uses and could undermine the deliverability of strategic sites. *The aim of the policy is to provide flexibility to Wiltshire's rural business community. Other forms of development will not be allowed if a planning permission for employment has not been built out.*
- A number of developers suggested that there is no clear guidance on how other DPD's will address employment opportunities and thus the core strategy needs to provide this guidance. *This is felt unnecessary as the plan already contains flexibility to enable sites to come forward including through neighbourhood plans or a site specific allocations DPD.*
- Again a number of developers suggested that the plan needs to recognise that employment opportunities extend in uses well beyond those defined by Use Classes B1, B2 and B8. *Other forms of employment for example tourism uses are addressed through other policies of the core strategy.*
- It was suggested that Wiltshire Council should consult with other bodies e.g. local Chambers of Commerce, Town Councils etc as to what they consider to be the wider strategic interest of Wiltshire and where they should be sited. *A change to the policy is not considered necessary as the key target sectors have been identified in consultation with Wiltshire's business community.*

2.8.2. Core policy 35: Existing employment sites

- A number of individuals and local organisations thought that, as in urban areas, the significance of employment sites and their value for both economic and social roles is just as important within a rural community where allowance should be made for suitable expansion of employment sites that may serve individual or groups of

villages in the local area. *The importance of the rural community is acknowledged through other policies of the Core Strategy including CP34 (additional employment land) and CP48 (supporting rural life).*

- Again it was suggested that the plan needs to recognise that employment opportunities extend in uses well beyond those defined by Use Classes B1, B2 and B8. *Other forms of employment for example tourism uses are addressed through other policies of the core strategy.*
- A parish considered a new paragraph 6.18 should be included: where there is a change of use of existing employment sites or re-adjustment to modern business needs, any change of use planning application must have regard to improving the green infrastructure of the site and location. *This is not considered necessary as Green Infrastructure is a requirement under Core Policy 52.*

2.8.3. Core policy 36: Economic regeneration

- A developer raised concerns that there is no mechanism for promoting Brownfield sites outside the main settlements. *Although this is noted, Brownfield sites outside the main settlements should be considered against the rural policies of the core strategy or Core Policy 37. The plan supports the development of brownfield sites in sustainable locations and includes a specific policy in relation to MoD sites.*

2.8.4. Core policy 37: Military establishments

- The Defence Infrastructure Organisation, other agents and Corsham Town Council indicated that they feel the policy is overly restrictive and should be more permissive in terms of uses on a site and the expansion of the existing footprint. *The policy allows for such changes on well located sites and there is therefore no need to change the policy.*
- Other representations indicated that there should not be a specific policy for military sites and that sustainability issues have not been properly taken into account. *The policy is location specific and responds to an acute issue within Wiltshire. It is therefore considered that the policy should remain.*

2.8.5. Core policy 38: Retail and leisure

- Property owners in Trowbridge suggested that the core strategy should define a Trowbridge Town Centre Boundary in line with NPPF requirements. *Saved Local Plan policies are currently in place, which set the context for the implementation of retail policy in Trowbridge. Saved policies will be reviewed.*

2.8.6. Core policy 39: Tourist development

- It was queried as to whether a sequential assessment is necessary for all proposals for tourist development, or whether it would be better to only require such an assessment for major proposals. *It is not considered that a change to the policy would be appropriate. The policy clearly states where tourism development will be acceptable and of what scale. Tourism is defined as a town centre use and therefore should be subject to the sequential test, especially in Wiltshire's larger settlements, as set out in Core Policy 39.*

2.8.7. Core policy 40: Hotels, bed and breakfasts, guest houses and conference facilities

- Concern was raised about criterion (i) not being justified and being against competition policy. *It is considered that the policy is sound as written.*

2.9. Delivering the strategic objectives: SO2: To address climate change

2.9.1. Core policy 41: Sustainable construction and low carbon energy

- There was some concern from an individual that the wording of Core Policy 41 is too weak in the section on climate change adaptation. *There is not sufficient evidence on viability to require development to comply with these measures, and an encouraging approach is therefore considered appropriate.*
- A large number of objections were received from the development industry in relation to the inclusion of requirements to meet certain levels of the Code for Sustainable Homes, and the statement that development of 500 units or more will be expected to be viable to meet zero-carbon standards from 2013 (Core Policy 41). *It is considered that the policy is fully justified and includes sufficient flexibility to take account of viability.*

2.9.2. Core policy 42: Standalone renewable energy installations

- There were requests (including a request from Keevil Parish Council) for a minimum threshold distance of 2,000m between wind turbines and dwellings. *This is an issue which could be addressed through a future Supplementary Planning Document if the evidence indicates that a minimum threshold is required.*
- A concern was raised that further assessment is required to find out if ground conditions in Wiltshire may be vulnerable to climate change. *There is insufficient evidence in relation to ground conditions to make a change to the strategy at this stage. This issue could potentially be considered through a future planning policy document.*

2.10. Delivering the strategic objectives: SO3: To provide everyone with access to a decent, affordable home

2.10.1. Core policy 43: Providing affordable homes

- A large number of developers have challenged the affordable housing target. Many feel that the affordable housing viability assessment is flawed. Reasons include:
 - Lack of developer involvement and no true examples.
 - Strategy needs to take account of individual site costs, the availability of public subsidy, S.106 requirements and other scheme costs.
 - 40% relates to numbers but means area in the study, thus even assuming all of site is developable land it should be nearer 30%.

The affordable housing viability assessment is considered sound and no evidence was offered to alter this view.

- Other proposed changes to the policy involved tightening up of the policy. It was suggested that more information is required on any approach to open book exercises, and that the policy should include information on acceptable profit margins. *A separate Supplementary Planning Document will be prepared that will cover these issues, and current best practice can be used in the interim period.*
- It was suggested that private landlords, parish councils and any other groups should be able to provide affordable housing. *National policy is clear that affordable housing is limited to registered providers, however that does not preclude the involvement in the delivery of affordable housing by these individuals/agencies.*

2.10.2. Core policy 44: Rural exceptions sites

- Cotswold Conservation Board expressed concern that cross subsidy of these sites will become the norm, rather than the exception, increasing landowners' expectations of the value of such sites, resulting in cross subsidy being required. It was suggested that reference to cross subsidy should be removed. *Evidence indicates that cross subsidy of these sites is vital for their delivery and historic under delivery will only be alleviated through radical measures. The policy is sufficiently stringent to ensure cross subsidy of sites is enabled in exceptional circumstances only.*
- A number of developers thought that restricting the sites to 10 dwellings is unnecessary. *Developments of over 10 dwellings are defined as major development and 'exceptions' policies are not designed to support major development.*

2.10.3. Core policy 45: Meeting Wiltshire's housing need

- It was contended that CP45 should allow greater flexibility for viability, and that the policy should also consider market demand and enable the market to determine type and mix. *The policy is considered robust and supported by the Strategic Housing Market Assessment.*

2.10.4. Core policy 46: Meeting the needs of Wiltshire's vulnerable and older people

- A number of providers objected to extra care homes needing to provide affordable homes. *Extra care is likely to increase and will be a significant part of Wiltshire's housing requirements in the future. As such it is necessary that affordable housing is provided at these sites to help support Wiltshire's most vulnerable residents.*

2.10.5. Core policy 47: Meeting the needs of Gypsies and Travellers

- It was suggested that the basis of the targets should not be the caravan count, and that the policy should plan for a longer period. *In both cases no new evidence has been introduced to suggest that the current evidence is flawed, and therefore no changes have been proposed in response to these comments.*

2.11. Delivering the strategic objectives: SO4: Helping to build resilient communities

- It was recommended that a reference should be included on the ability of new development to facilitate the protection and enhancement of services. *The settlement strategy already recognises the roles of Large and Small Villages and that some development at these locations supports those roles. It is not necessary to duplicate this information.*

2.11.1. Core policy 48: Supporting rural life

- The NPPF removes the requirement to prioritise economic and tourist use first when re-using rural buildings and this should be reflected in CP48. *The NPPF does not preclude the prioritisation of the re-use of rural buildings for economic and tourist use first. The Core Strategy puts an emphasis on economic growth as a driving force for creating resilient communities in rural areas, and this is reflected in the prioritisation of the re-use of rural buildings for economic or tourist use first.*
- It was stated that CP48 omits reference of an abuse of the concession being grounds for refusing permission for the re-use of rural buildings that have been allowed through permitted development rights. *This can be dealt with through the development management system.*

- Various wording changes were recommended to reflect technical issues. *The plan is already considered sound without the suggested changes and the proposed amendments would not add anything to the clarity of the core strategy.*

2.11.2. Core policy 49: Protection of services and community facilities

- It was recommended that protecting community facilities should also refer to urban areas. *This is not considered appropriate because the protection of community facilities is a particular issue in rural areas.*
- It was suggested that the policy is unsound because it fails to involve or mention local councils as elected community leaders. *This can be recognised outside the core strategy process.*
- Various wording changes were recommended to reflect technical issues. *The plan is already considered sound without the suggested changes and the proposed amendments would not add anything to the clarity of the core strategy.*

2.12. Delivering strategic objectives: SO5: Protecting and enhancing the natural, historic and built environment

- It was suggested that a number of the policies in this section would be more appropriate as part of a Development Management DPD. *The policies are all deemed appropriate and justified for inclusion in the core strategy to help meet the objectives of the plan and the NPPF supports a move towards fewer planning documents.*

2.12.1. Core policy 50: Biodiversity and geodiversity

- Concerns were raised that stronger protection of statutory sites is needed. *This is not considered necessary because protection for statutory sites is clearly set out in national policy and is referenced in the Core Strategy.*
- Bloor Homes raised a concern that CP50 lacks flexibility. *It is not necessary to restate the requirement of the Community Infrastructure Levy regulations which would be applied to any planning obligation, and the wording in relation to Special Protection Area mitigation needs to be worded strictly in order to meet regulatory requirements.*

2.12.2. Core policy 51: Landscape

- Natural England raised a strong concern that the council has not demonstrated that it has adequately considered the impacts on designated landscapes in writing its policies, particularly in relation to the ability of AONBs to accommodate non-strategic growth, how the size of allocations has been adjusted to take account of the AONBs, and that the appraisal of strategic site options does not provide adequate information. *In regards to the strategic sites, the council's appraisal indicates that the sites can, in principle, deliver the required allocation without unacceptable impacts upon the AONBs. In regard to the other issues raised, a change has been proposed to the relevant area strategies to recognise the location within an AONB, and officers will seek to resolve any remaining issues through discussions with Natural England.*
- There was a suggestion that CP51 should include protection of agricultural land. *The NPPF sets out the approach to be taken in relation to best and most versatile agricultural land and it is not necessary to duplicate it in the Core Strategy. It was considered as part of the site selection process.*
- Concerns were raised about the need for CP51 to protect against coalescence. *It is considered that the spatial strategy set out in CP1 and CP2 already provides sufficient protection against coalescence in setting out how development will come forward.*

- A concern was raised that CP51 is not in conformity with the NPPF because it does not set out criteria against which proposals can be judged. *It is considered that the policy sets out eight criteria on which the landscape impacts of developments can be judged.*

2.12.3. Core policy 52: Green infrastructure

- The need for a comprehensive audit of sports facilities (in order to be in compliance with the NPPF) was highlighted. *A review of audit facilities is being carried out by the council and can be considered through the core strategy review if appropriate.*

2.12.4. Core policy 53: Wilts and Berks and Thames and Severn canals

- It was suggested that the saved policies for the Kennet and Avon canal are out of date and CP53 should be expanded to cover the Kennet and Avon canal as well. *The Kennet and Avon canal's landscape and natural environment will be protected through CP50, 51 and 52. Further, detailed, policy on the Kennet and Avon canal could be provided through a review of saved Local Plan policies now proposed as part of a review of the core strategy in the LDS .*
- Melksham Without Parish Council raised a concern about the loss of community facilities due to canal realignment (CP53) and requested a guarantee that facilities will be replaced elsewhere. *Wiltshire Council will not be financially responsible for providing alternative sites for community faculties, but will work with local communities and developers to identify alternatives. CP49 protects rural community facilities and services where necessary.*

2.12.5. Core policy 54: Cotswold Water Park

- No significant issues were raised in relation to CP54.

2.12.6. Core policy 55: Air quality

- A concern was raised that Air Quality Action Plans are still outstanding for Wiltshire and that an Air Quality Strategy Implementation Plan is required as part of the Core Strategy. *The air quality strategy is being progressed through Environmental Health as is regulatory appropriate. Supplementary guidance on the implementation of core policy 55 is also being prepared.*

2.12.7. Core policy 56: Contaminated land

- No significant issues were raised in relation to CP56.

2.12.8. Core policy 57: Ensuring high quality design and place shaping

- A concern was raised about the complexity of CP57, with thirteen different factors to be taken into account. *Design is considered an important factor to be considered within the core strategy and the level of complexity reflects the importance of this objective.*

2.12.9. Core policy 58: Ensuring the conservation of the historic environment

- Concerns were raised that CP58 does not cover the setting of the World Heritage Site or the importance of maintaining the balance between the historic townscape and open and green space. *These issues are covered by CP59 and CP57 respectively.*

- A concern was raised that CP58 does not include a caveat as to whether or not exploitation of distinctive elements of the historic environment would be appropriate and sensitive. *The policy text states that these elements will be conserved and enhanced and proposals will therefore need to be appropriate and sensitive.*

2.12.10. Core policy 59: The Stonehenge, Avebury and Associated Sites World Heritage Site and its setting

- No significant issues were raised in relation to core policy 59 which haven't led to proposed changes.

2.13. Delivering strategic objectives: SO6: To ensure that essential infrastructure is in place to support our communities

2.13.1. Core policy 60: Sustainable transport

- Purton waste site is not most efficient or sustainable for transport and doesn't accord with overall stated policy. *This site has been subject to the council's waste site selection and site appraisal process (including SA/SEA) since 2005 and has subsequently been included as a site allocation in the Wiltshire and Swindon Waste Site Allocations Local Plan which was submitted to the Secretary of State on 14 February 2012.*
- Policies 60 & 66 both make reference to a Local Transport Plan large parts of which have still not been delivered. *The Wiltshire Local Transport Plan (LTP) 2011-2026 Strategy and Implementation Plan documents required by the Local Transport Act 2008 were adopted by the council in February 2011 along with four optional supplementary LTP documents. A number of other supplementary LTP documents are due to be developed in 2012/13.*
- There was concern that the LTP is not complete and a number of strategies are outstanding. *The Wiltshire Local Transport Plan (LTP) 2011-2026 Strategy and Implementation Plan documents required by the Local Transport Act 2008 were adopted by the council in February 2011 along with four optional supplementary LTP documents. A number of other supplementary LTP documents are due to be developed in 2012/13.*
- There was concern that improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims. *Improving journey time reliability on key routes helps support economic growth which is a key national transport goal. The council will work to ensure that any implemented measures will have long-term benefits and will complement the wider approach to sustainable transport.*
- It was suggested that Core Policy 60 should also recognise that in relation to tourism uses, there is often no feasible alternative to the private car, for reaching more remote areas. *It is accepted that in terms of tourism, in order to reach more remote areas, individuals may have no other feasible option other than to travel by private car. However, where ever possible, the council will seek to encourage the use of sustainable transport alternatives.*
- It was suggested that the policy is too weak to tie in with stated objectives and deliver a major modal shift. Transport analysis should look at issues and options for buses, rail and integration of modes for the area. Introduce a policy for public transport rather than 'sustainable transport'. *In addressing 'sustainable transport', Core Policy 60 covers all modes of transport including public transport. The Wiltshire Local Transport Plan 2011 – 2026 looked at the challenges and opportunities for all modes of transport across Wiltshire. A separate LTP Public Transport Strategy sets out the council's long term strategy and short term delivery plan for public transport.*

- It was suggested that the policy should include the re-opening of railway stations. *Core Policy 66 of the Wiltshire Core Strategy deals with the development and/or improvement of railway stations across Wiltshire.*
- There was concern that the proposals for Chippenham are contrary to bullets iii. and vi. *The council is currently developing a transport strategy for Chippenham that will ensure that the proposed development meets the requirements of Core Policy 60.*
- There was concern that the policy is more appropriate as part of a Development Management DPD. *It is considered that Core Policy 60 is a strategic policy and is therefore appropriately sited in the Core Strategy. There is currently no intention to produce a separate Development Management DPD; instead the council will undertake a partial review of the Core Strategy in order to accommodate those saved policies that exist in the current Local Plans that are in accordance with the National Planning Policy Framework.*
- There was concern that restricting the amount of housing to address out commuting can severely limit funding for sustainable transport. Also need to consider locations with a reasonable chance that a bus service will be used by residents and that a service can continue after legal agreements have ceased. *The Wiltshire Core Strategy in no way seeks to address out commuting by restricting the amount of housing; rather it seeks to address the issue by encouraging settlements to be more resilient therefore reducing the need to travel.*
- There was agreement that developments should be located in the most sustainable locations, however, in applying this approach considerations should also be paid to the appropriateness of developing sites that will take advantage of employment, shopping and service facilities that may be located in adjoining authorities. In this respect the importance of Swindon to the eastern fringe of North Wiltshire cannot be ignored as by reason of its close proximity, size, combined with the existing level of employment and service opportunities mean it is already a significant centre. *As per the NPPF, the Core Strategy has been prepared in the spirit of cross border co-operation with each of our neighbouring authorities. Discussions regarding transport issues across county boundaries form an ongoing dialogue.*

2.13.2. Core policy 61: Transport and development

- There was concern that policy TR14 of Salisbury District Plan has been deleted without reference to the policy that allegedly replaces it. Policy TR14 or equivalent should be reinstated. *Saved policies TR11 through to TR17 of the Salisbury District Plan will form part of a partial review of all local plan policies from across Wiltshire. The review will seek to accommodate those policies in the Wiltshire Core Strategy that comply with the National Planning Policy Framework.*
- The policy wording is not justified as does not refer to the reuse of buildings and therefore will not be effective. The wording does not comply with the provisions of NPPF. *In addition to new development, any applications for potential change of use will also be required to comply with Core Policy 61. Therefore in this instance the phrase 'new development' includes the reuse of buildings.*
- There was concern about the transport proposals at J16. *The impact of Swindon's growth on M4 Junction 16 has been the subject of extensive analysis, and a scheme for improvement of the junction is already secured by planning condition. Final detailed approval by Wiltshire Council and the Highways Agency will be required prior to implementation.*
- The policy fails to address the layout of new development, which persists to be car based with distributor roads. Re-word policy to promote good walking and cycling environment etc. *Core Policy 61 of the Core Strategy includes a hierarchy of transport users that favours the needs of pedestrians and cyclists above those of private cars and goods vehicles.*

- There was concern that the criteria ii. should include reference to safe access to the rail network as well as to the highway network. *The reference in Core Policy 61 of the Core Strategy to proposals being capable of being served by safe access to the highway network refers directly to road safety. As access to the rail network is generally via the highway network this is effectively also dealt with in criteria ii.*
- It may be more appropriate to provide offsite waiting than on site facilities to meet worst case scenarios, particularly for town centre locations where the quality of the public realm is the primary concern. *Core Policy 61 will require that a transport assessment demonstrates fit for purpose and safe loading/unloading facilities be provided for any new relevant development. This assessment may include offsite waiting solutions where on site facilities prove to be inadequate.*
- Unsure of implications of this policy, particularly the operation of the hierarchy as set out in relation to fundamentally different needs, where meeting one level of the hierarchy does not necessarily have any impact on the needs to meet requirements for other levels. *The use of a hierarchy will ensure that the needs of more vulnerable and sustainable modes of travel are considered before the needs of goods vehicles, powered two-wheelers and private cars.*
- There was support for the objective to reduce the need to travel and encourage the use of sustainable transport alternatives. However, where a contribution is sought towards transport improvements it must be set out in a planning obligations DPD which is examined as part of the LDF process, and / or meet the tests of the CIL Regulations 2010. *Wiltshire Council is currently in the process of developing a CIL that will give greater flexibility and freedom to local authorities and communities in setting their own priorities for funding infrastructure necessary to support development. The levy also provides developers with more certainty 'up front' about how much money they are expected to contribute and ensures greater transparency for local people in understanding how new development is contributing to their community.*
- There needs to be provision in the design of road layouts, especially in villages, for parking in front of village facilities (such as shops and post offices). *An on-street parking hierarchy forms part of the Local Transport Plan Car Parking Strategy referred to in paragraph 6.160 of the Core Strategy.*

2.13.3. Core policy 62: Development impacts on the transport network

- Developers should be allowed to use contributions more flexibly to improve cycle and pedestrian networks beyond the development site.
- There was concern that this policy appears to conflict with the proposals for Chippenham.
- In order to ensure the construction and operation of the transport network it will be appropriate to pool funding from a number of developments.

The consultation responses regarding the proposals for Core Policy 62 have not raised any issues or present any new evidence which would undermine the soundness of the Core Strategy. Wiltshire Council are currently developing a Community Infrastructure Levy that seeks to contribute towards the "funding gap" between the total cost of infrastructure necessary to deliver new development and the amount of funding from other sources. CIL can be spent on a wide range of infrastructure in order to support development whilst giving greater flexibility and freedom to local authorities and communities in setting their own priorities for funding infrastructure necessary to support development.

2.13.4. Core policy 63: Transport strategies

- There was concern that the policy should not only relate to the principal towns, but should also relate to the market towns, and should include reference to improvements to rail transport

The consultation responses regarding the proposals for Core Policy 63 have not raised any issues or present any new evidence which would undermine the soundness of the Core Strategy. The decision to focus spending on integrated transport measures in the principal towns has been taken in line with the overall delivery strategy of the Core Strategy as this provides the greatest opportunities within Wiltshire to deliver improved self containment and potential to generate job growth. Having said this, the policy states that "Transport strategies may also be developed for other urban and rural areas in the Plan area". Rail transport is included in the proposed enhancements to public transport services and facilities as per bullet point ii of Core Policy 63.

2.13.5. Core policy 64: Demand management

- Standards should reflect needs of rural areas with poor public transport.
- There was concern that business owners should not be compelled to charge for parking spaces.
- Concerned about the preference to use unallocated communal car parking. Car parking that is not attributed to and separated from an individual property could result in potential crime and community safety issues.

The consultation responses regarding the proposals for Core Policy 64 have not raised any issues or present any new evidence which would undermine the soundness of the Core Strategy. Core Policy 64 of the Core Strategy supports and is consistent with the objectives of the Wiltshire Local Transport Plan Car Parking Strategy.

2.13.6. Core policy 65: Movement of goods

- Thingley Junction should be mentioned as an example of a site which should be safeguarded.
- There needs to be a modal shift towards getting more large volumes of freight on to rail and water transport.

The consultation responses regarding the proposals for Core Policy 65 have not raised any issues or present any new evidence which would undermine the soundness of the Core Strategy. Bullet point i of Core Policy 65 seeks to encourage the use of rail or water for freight movements, especially for those developments that generate large volumes of freight traffic.

2.13.7. Core policy 66: Strategic transport network

- It was suggested that the options evaluated in SA are poor quality. *The options evaluated in the SA have been part of an iterative process and follow on from a first draft of the Sustainability Appraisal Report, published in October 2009, which accompanied the document 'Wiltshire 2026', and an Interim Sustainability Appraisal Report which accompanied the second iteration of the Core Strategy, published in June 2011.*
- There was concern that improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims. *Improving journey time reliability on key routes helps support economic growth which is a key national transport goal. The council will work to ensure that any implemented measures will*

have long-term benefits and will complement the wider approach to sustainable transport.

- *It was suggested that Wiltshire and B&NES need to work together and take an integrated view of the options, benefits and problems associated with managing HGVs from Southampton to the M4. As per the NPPF, the Core Strategy has been prepared in the spirit of cross border co-operation with each of our neighbouring authorities. Discussions regarding transport issues across county boundaries form an ongoing dialogue.*
- *There was concern that the description of the transwiltis rail line is missing. Should mention joint working with West of England Partnership on transport. The Transwiltis line is included in the rail network. The Council will work with a variety of agencies, including relevant cross-boundary organisations, to develop and improve the strategic transport network.*
- *The inclusion of Corsham railway station is welcomed. Noted.*
- *It was suggested that there should be a greater emphasis for the need for railway station at RWB especially in relation to developments at Lyneham. The need for a railway station at Royal Wootton Bassett has been identified in Core Policy 66 under bullet point c.*
- *It was suggested that more detail about J16 proposals should be in policy. Unhappy at pressure being exerted by Swindon from development and design. The impact of Swindon's growth on M4 Junction 16 has been the subject of extensive analysis, and a scheme for improvement of the junction is already secured by planning condition. Final detailed approval by Wiltshire Council and the Highways Agency will be required prior to implementation.*
- *The policy is more appropriate as part of a Development Management DPD. It is considered that Core Policy 66 is a strategic policy and is therefore appropriately sited in the Core Strategy. There is currently no intention to produce a separate Development Management DPD, instead the council will undertake a partial review of the Core Strategy in order to accommodate those saved policies that exist in the Local Plan that are in accordance with the National Planning Policy Framework.*
- *It is considered that the policy should be amended to make reference to the proposed access off the A350 to serve land at Showell Farm. Core Policy 66 doesn't make specific references to individual developments and access arrangements on the A350; rather it ensures that the strategic transport network along the A350 corridor as a whole will be maintained, managed and selectively improved.*
- *There is concern that Melksham Station is being put in the same category as Corsham and Wootton Bassett even though the latter two towns do not actually have railway stations as yet. The accompanying text in Core Policy 66 clearly states that development "and/or" improvements will be promoted and encouraged at the 3 stations listed; obviously, how this policy is applied depends on the individual station circumstances.*

2.13.8. Core policy 67: Flood risk

- *It was suggested that there should be a general presumption in favour of locating all new development outside flood zones 2 and 3. The approach to be taken to development within flood zones 2 and 3 is covered by national policy in the National Planning Policy Framework.*
- *There was a suggestion that flooding should be viewed as part of a range of planning considerations rather than an absolute constraint. As set out above, the approach to be taken to development in areas of flood risk is set out in national planning policy.*

2.13.9. Core policy 68: Water resources

- There was concern that core policy 68 does not offer the level of restraint required to limit over abstraction of the River Kennet catchment. *The local planning authority follows the advice of the licensing authority in regard to issues around abstraction, and no change to the policy is considered necessary.*
- It was suggested that the plan should reduce the projected housing and employment land quanta in order to ensure that water resources and natural systems are not compromised, and that the plan is not supported by evidence to prove that water supplies can be delivered to support growth. *The housing and employment quanta proposed in the core strategy are justified in topic paper 7 (economy) and topic paper 15 (housing requirement technical paper). The core strategy is supported by the Infrastructure Delivery Plan which has been informed by consultation with infrastructure providers, and which sets out the infrastructure required to support growth.*

2.13.10. Core policy 69: Protection of River Avon SAC

- It was suggested that core policy 69 should provide the same level of protection to the River Kennet SSSI as that afforded to the River Avon SAC. *The policy is considered to be in conformity with the National Planning Policy Framework which states in paragraph 113 that “distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks”.*
- It was suggested that core policy 69 should be redrafted to fully comply with the rigour of the Habitats Directive and the requirements of the Appropriate Assessment regime. *The wording of this policy has been agreed with Natural England and no changes are considered to be necessary.*

2.14. Appendices

2.14.1. Appendix A: Development templates for strategic allocations

- A concern was raised that the development templates have not been subject to formal public consultation. *The development templates have been prepared as a result of the site selection work and to ensure requirements from other policies are applied on a site by site basis. The information is not new information. Consultation carried out so far is sufficient.*
- The Core Strategy includes only a brief generic reference to instances where sites will affect heritage assets, including their setting, and features of archaeology of significance. This should be revised to reflect national planning policy more fully, particularly paragraphs 169 and 170 of the NPPF. *The development templates ensure that heritage assets and archaeological constraints are addressed through the masterplanning process.*
- Various minor changes were proposed to the development templates by developers promoting the sites. Others are considered unnecessary. The key issues which have been raised, which have not been resolved at this stage and which are considered to be key issues for discussion at the Core Strategy Inquiry stage are:
 - **North Chippenham Strategic Site** Accept that a suitably designed buffer is required, but there is no evidence or justification for 50m buffer. *Woodland management and education facilities are appropriate to be located within 50m. This requirement is in accordance with national guidance.*

- **Rawlings Green Strategic Site** Remove reference to delivery of railway bridge in conjunction with North Chippenham site. Evidence gathered as part of Chippenham transport modelling work has indicated development will improve transport connectivity to the north of the town and also provide the opportunity to begin to put into place appropriate transport measures should further development be required further to the east of Chippenham beyond this plan period. *The Council remains of the opinion that the North Chippenham site should contribute to the delivery of a railway crossing in conjunction with the Rawlings Green, East Chippenham site.*
- **Land at West Warminster Strategic Site** Some responses including from Natural England have questioned the landscape capacity to accommodate development. *The site area is larger than that required to deliver 900 homes and 6ha employment and provides space for further mitigation if required.*
- **Drummond Park, Ludgershall** Outline Drummond Park planning application was designed on the basis that a future phase of development would come forward on the site to the west to provide future pedestrian and street linkages. This site should be reinstated as per the 2011 version of the CS. *Evidence for site selection is set out in Topic Paper 12. An extension to this site is not necessary. No change necessary.*

2.14.2. Appendix B: List of topic papers

- A small number of responses said that not all documents were available during the previous consultation (June to August, 2011) and that this consultation should be repeated. *However, things have moved on and the previous 2011 consultation was an additional, informal stage of consultation on the emerging core strategy and developing evidence base.*

2.14.3. Appendix C: Housing trajectory

- A number of comments were received relating to the level of detail provided in the housing trajectory. *These comments have informed the proposed changes to Appendix C, and additional detail will be added where this is considered appropriate.*

2.14.4. Appendix D: Saved policies

- A large number of responses were from Westbury residents, particularly those near the previously proposed bypass, that the T1a Westbury Bypass Package policy in the West Wiltshire Local Plan should not be saved. *The package needs to be saved as it is part of a wider policy, parts of which are still valid.*

2.14.5. Appendix E: List of settlement boundaries retained and Appendix F: List of settlement boundaries removed

- It was suggested that the proposed removal of settlement boundaries has not been communicated to the electorate in an active manner. *The proposal to remove settlement boundaries from Small Villages and those settlements not identified in the strategy was included in the June 2011 consultation document as well as the more recent pre-submission document. It is considered that the consultation process undertaken has been fully compliant with the regulations and the Wiltshire Council Statement of Community Involvement.*

2.14.6. Appendix G: Principal Employment Areas

- There was a suggestion that the Principal Employment Area at Southampton Road, Salisbury should reflect the existing employment provision and be extended accordingly. *The area identified in appendix G is considered to be appropriate.*

2.14.7. Appendix H: Proposals map

- A concern was raised that the proposals map wasn't available to comment on as part of the consultation. *Appendix H outlines what constitutes the proposals map for the core strategy.*