



# Wiltshire Housing Site Allocations Plan

## Focussed Consultation on Wiltshire Council's Schedule of Proposed Changes and Associated Evidence Documents

Consultation Report (Appendix J)  
November 2018

## Wiltshire Council

Information about Wiltshire Council services can be made available on request in other languages including BSL and formats such as **large print** and audio. Please contact the council on **0300 456 0100**, by textphone on 01225 712500 or by email on [customerservices@wiltshire.gov.uk](mailto:customerservices@wiltshire.gov.uk).

如果有需要我們可以使用其他形式（例如：大字體版本或者錄音帶）或其他語言版本向您提供有關威爾特郡政務會各項服務的資訊，敬請與政務會聯繫，電話：0300 456 0100，文本電話：(01225) 712500，或者發電子郵件至：[customerservices@wiltshire.gov.uk](mailto:customerservices@wiltshire.gov.uk)

يمكن، عند الطلب، الحصول على معلومات حول خدمات مجلس بلدية ويلتشير وذلك بأشكال (معلومات بخط عريض أو سماعية) ولغات مختلفة. الرجاء الاتصال بمجلس البلدية على الرقم ٠٣٠٠٤٥٦٠١٠٠ أو من خلال الاتصال النصي (تيكست فون) على الرقم ٧١٢٥٠٠ (٠١٢٢٥) أو بالبريد الإلكتروني على العنوان التالي: [customerservices@wiltshire.gov.uk](mailto:customerservices@wiltshire.gov.uk)

ولشائر کونسل (Wiltshire Council) کی سروسز کے بارے میں معلومات دوسری طرزوں میں فراہم کی جاسکتی ہیں (جیسے کہ بڑی چھپائی یا آڈیو ہے) اور درخواست کرنے پر دوسری زبانوں میں فراہم کی جاسکتی ہیں۔ براہ کرم کونسل سے 0300 456 0100 پر رابطہ کریں، ٹیکسٹ فون سے (01225) 712500 پر رابطہ کریں یا [customerservices@wiltshire.gov.uk](mailto:customerservices@wiltshire.gov.uk) پر ای میل بھیجیں۔

Na życzenie udostępniamy informacje na temat usług oferowanych przez władze samorządowe hrabstwa Wiltshire (Wiltshire Council) w innych formatach (takich jak dużym drukiem lub w wersji audio) i w innych językach. Prosimy skontaktować się z władzami samorządowymi pod numerem telefonu 0300 456 0100 lub telefonu tekstowego (01225) 712500 bądź za pośrednictwem poczty elektronicznej na adres: [customerservices@wiltshire.gov.uk](mailto:customerservices@wiltshire.gov.uk)

<b>Comment ID:</b>	1	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1102653	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [H2.4]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>With regards to H2.4 Church Lane there appears to be no response to concerns raised during the initial consultation process in September 2017 regarding protection of ancient hedgerows in accordance with The Ancient Hedgerow Act 1997. Evidence was submitted to the Council ( Ancient Hedgerow, Hedgerow map 1838 and hedgerow map 1886)which proved that all the existing hedge lines at the site would qualify as ancient hedgerow. This evidence seems to have been completely ignored by the council. The Ancient hedgerows within Site H2.4 would preclude access to the larger portion of the site and on these ground alone development should not be permitted. WHSAP Consultation Statement Regulation 22 Appendices M-P: In Stage 2 of the HSAP the omissions sites for Trowbridge were discounted on the basis that they were inside the settlement boundary. When we moved into 344 Church Lane we were informed by Wiltshire Planning that development of the Church Lane site would not be possible as it was outside the settlement boundary. This is contradictory. How can this be a valid reason for excluding the Bowyers, Hospital, Margaret Stancombe School, East Wing and Ashton Street sites when Wiltshire Council states that it is committed to providing affordable housing with good transport links alongside urban regeneration for a growing population? In addition, the full extent of the Heritage, Archeological, Recreational, Agricultural and Environmental importance of Church Lane was not considered at Stage 2 as this was only raised by residents and outside agencies in September 2017. The Council should therefore remove Church Lane from the HSAP until they can prove that development of the omissions sites (mentioned above) would have a greater impact on these criteria (which clearly they cannot).</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5073988</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	2	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1054315	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC27				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I refer to Table 24 Grid references M9, N8, N9,O8, P8 and O9 of Document SBR PC27 where the text clearly states that the objection I raised during the initial consultation concerning 181 Devizes Road had been accepted and the settlement boundary would remain as the extent of the garden of the property and adjoining properties. The interim review had moved the boundaries of a number of properties to an artificial line half way down the long established gardens. However, though my objection had been accepted, the map published with this document shows the boundary still running on an artificial line halfway through my garden and the gardens of numbers 178-189 inclusive. Other properties on the same side of Devizes road on either side of 178-189 are shown as having their boundaries adjusted and in many cases extended so that they coincide with the gardens of the properties but not ours. I would be grateful if the examiner would rectify this error in his final report, or explain to me why numbers 178-189 need to be treated differently to the rest of Devizes Road. My reason for saying that the document is unsound is because the wording of the revisions and the map supplied are not in agreement.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>No</p>

<b>Comment ID:</b>	3	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1184120	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the removal of the Ridgeway Farm site allocation from the Wiltshire Site Housing DPD (development plan document). I think the consultation material is sound and legally compliant. Local council is already complying with planning requirements and putting a lot of effort into ensuring the village meets with what is needed under national and regional planning requirements whilst taking into account what those already living in the area are happy with so that housing is grown as per national requirements but with sympathy to local concerns. The Ridgeway Farm Site Allocation goes against Wiltshire Council's own Core Strategy of development in large villages being limited to small sites. On that point alone, the Ridgeway Farm site allocation should be removed from the Wiltshire Site Housing DPD. However, furthermore I do not feel the roads and drainage in the village would cope with such a development. On the strength of that I support the removal of the Ridgeway Farm site allocation from the Wiltshire Site Housing DPD (development plan document).				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



Comment ID:	4	<b>Consultee</b> <b>Person ID:</b> 1184109	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
				<b>Do you consider the Proposed Change to be sound?</b>	Yes
Identify subject of representation	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
Identify Proposed Change Reference Number	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	5	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1125644	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The consultation material and proposed changes now reflect far more accurately the views of myself, my wife, and as I understand it, the vast majority of Parishioners. Specifically: 1 There is no strategic need for Wiltshire to allocate housing in Crudwell. The supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" of local needs. Recent development and a new proposed development does not fall within this definition and will, I believe, be severely detrimental to the character, amenity and enjoyment of the village by existing and future residents. 2 The village is currently well down the process of developing a Neighbourhood Plan. This is progressing extremely well with Reg 14 Consultation planned for November 2018 and Reg 16 planned for early Spring 2019. This plan identifies a number of small, sustainable sites, to meet identified needs, and more than adequately contributes Crudwell's share of housing supply and will be acceptable and welcomed by myself and most parishioners. 3 It is accepted as a principle that the Council's and Government's localism agenda is best served by allowing the Parish to determine its own future. In summary, I fully accept the need for future housing supply, and believe that the proposed changes to the Housing Allocation Plan outlined at PC92 properly reflect the views and wishes of Crudwell's parishioners.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

Comment ID:	6	<b>Consultee</b> <b>Person ID:</b> 1184115	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
				<b>Do you consider the Proposed Change to be sound?</b>	Yes
Identify subject of representation	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
Identify Proposed Change Reference Number	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposal to delete the section Malmesbury Community Area Remainder and H2.13 Ridgeway Farm Crudwell as There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future. furthermore previous applications for such development were rejected / Amended due to now well documented reasons including higher levels of traffic on Tetbury Lane, flooding issues etc.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

Comment ID:	7	<b>Consultee</b> <b>Person ID:</b> 1184194	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
				<b>Do you consider the Proposed Change to be sound?</b>	Yes
Identify subject of representation	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
Identify Proposed Change Reference Number	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	As it has been established that there is no strategic need to allocate additional housing in the Parish of Crudwell, I believe this to be an appropriate amendment to the site allocation plan.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	8	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1184377	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The consultation material and proposed changes now reflect far more accurately the views of myself and my husband, and, in my opinion, the vast majority of the parish. In particular: 1. There is no strategic need for Wiltshire to allocate housing in Crudwell. The supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" of local needs. Recent development and a new proposed development does not fall within this definition and will, I believe, be severely detrimental to the character, amenity, and enjoyment of the village by existing and future residents. 2. The village is currently well down the process of developing a Neighbourhood Plan. This is progressing extremely well with Reg 14 Consultation planned for November 2018 and Reg 16 planned for early spring 2019. This plan identifies a number of small, sustainable sites, to meet identifiable needs, and more than adequately contributes Crudwell's share of housing supply and will be acceptable and welcomed by myself and most parishioners. 3. It is accepted as a principle that the Council's and Government's localism agenda is best served by allowing the Parish to determine its own future. In summary, I fully accept the need for future housing supply, and believe that the proposed changes to the Housing Allocation Plan outlined at PC92 properly reflect the views and wishes of Crudwell's parishioners.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

Comment ID:	9	<b>Consultee</b> <b>Person ID:</b> 1184586	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
				<b>Do you consider the Proposed Change to be sound?</b>	Yes
Identify subject of representation	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
Identify Proposed Change Reference Number	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the removal of the site at Crudwell from the WHSAP. The reason for this is that in the wider context of completions that have already occurred in the Malmesbury CA over the WCS plan period, there is no longer a strategic need to allocate a site in the community area through the WHSAP. Given that good progress has been made on the preparation of the Crudwell Neighbourhood Plan, which seeks to allocate sites, evidence indicates that the Council can defer housing allocation options to be developed through the emerging neighbourhood plan, rather than through the WHSAP the WHSAP. The reason for this is that in the wider context of completions that have already occurred in the Malmesbury CA over the WCS plan period, there is no longer a strategic need to allocate a site in the community area through the WHSAP. Given that good progress has been made on the preparation of the Crudwell Neighbourhood Plan, which seeks to allocate sites, evidence indicates that the Council can defer housing allocation options to be developed through the emerging neighbourhood plan, rather than through the WHSAP				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	10	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1184879	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the removal of the Ridgeway Farm site allocation from the Wiltshire Site Housing DPD (development plan document). I think the consultation material is sound and legally compliant. Local council is already complying with planning requirements and putting a lot of effort into ensuring the village meets with what is needed under national and regional planning requirements whilst taking into account what those already living in the area are happy with so that housing is grown as per national requirements but with sympathy to local concerns. The Ridgeway Farm Site Allocation goes against Wiltshire Council's own Core Strategy of development in large villages being limited to small sites. On that point alone, the Ridgeway Farm site allocation should be removed from the Wiltshire Site Housing DPD. However, furthermore I do not feel the roads and drainage in the village would cope with such a development. On the strength of that I support the removal of the Ridgeway Farm site allocation from the Wiltshire Site Housing DPD (development plan document).				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	11	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1185083	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>No</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>No</p>



<b>Comment ID:</b>	12	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1126672	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support change PC92 proposed for the Wiltshire Site Allocation Plan and am in favour of its acceptance for the following reasons. General points: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future. Site Specific points: I have major concerns about the size of the development proposed in H2.13 Ridgeway Farm Crudwell. The area already suffers from surface water flooding and sewage backup due to inadequate mains drainage. The road is small and without pavements and unable to accommodate traffic increases safely.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	13	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1125408	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				
<b>Please give details of why you support or do not support the updates to the</b>	Please see a summary of my comments below:				

**associated evidence documents.**

1. My most important point is as follows – The selection of this site appears all too engineered. It scored negatively in 9 of the 12 sustainability criteria but was concluded to be ‘more sustainable’. Adjacent/opposite sites (e.g. site 738) have been excluded because of the lack of walking and cycling facilities but there is no mention of these issues at this site (site 321) which is located on the opposite side of the B3098. All 214 comments by the public as part of the September 2017 consultation have been ignored. And it is very convenient that the only portion of land identified as suitable for construction in the entire area surrounding Westbury happens to be land where the landowner has offered the Council the land.
2. The Westbury Community Area Topic Paper has failed to consider, or even mention, that Bratton Parish Council rejected the plans for site 321 in September 2017, citing a number of factors and concerns voiced by members of the Parish. In fact, the information contained in the table on page 46 has not been updated in this July 2018 document, and as such is a direct contradiction to the Parish Council’s September 2017 response, in which the plans were rejected. This is not reflected in the most recent paper and is of great significance (regardless of it being noted in another document, because it is of great importance). This is incorrect information and needs to be changed.
3. The Westbury Community Area Topic Paper document has failed to consider in excess of 200 responses to the Aug-Sept 2017 public consultation with regard to site 321, of which the overwhelming majority of contributors were raising serious concerns with building on the site. It appears evident that the results did not contribute to, and were not considered, before drawing a conclusion. This is the opportunity for local people to have a say on the future of their area; the responses to this consultation appear to have been ignored and not mentioned in any place within the document. It appears, on the surface, that a decision was already made and that the consultation was a waste of time for everybody involved. Local residents (Council Tax payers) deserve to have a valued input into the selection process – their views have not been mentioned in a report that is of great significance to the area in which they live and care about.
4. The Westbury Community Area Topic Paper notes that site 738 was removed for the following reason: “The overall sustainability benefits would be marginal due to a lack of certainty that comprehensive and attractive routes for pedestrians and cyclists are deliverable.” This site is located directly opposite site 321 – so I assume that this fact would equally apply to site 321. Why has this not been applied?
5. The Westbury Community Area Topic Paper contains contradictions within the document. On page 46 it is noted that, “The Parish Council did not respond to consultation on the Housing Site Allocations DPD.” On page 63 it then notes that, “Bratton Parish Council are in the early stages of preparing a Neighbourhood Development Plan...” which implies that they did respond. This is a contradiction within the same report.
6. As noted previously: In your reply to my concerns on 17th August, you noted the following:  
  
The Westbury Community Area Topic Paper (July 2018) is a record of both the site selection and the settlement boundary review process. The information that you refer to on page 46 was correct at the time that section of the site selection methodology was produced.  
  
This information is no longer correct, so why has it not been updated? The fact that it was correct at the time of the site selection methodology is not relevant. The information is incorrect and needs to be changed.
7. In September 2017 a public consultation was carried out in which 214 responses were received. Every single response appears to have been ignored. The only change that was put forward in the Consultation Statement Regulation 22 (1) (c) Appendices M-P was that the number of houses was reduced from 40 to 35 because “the promoters of the site have carried out further detailed assessment and potential layouts which show that 35 dwellings may be more readily accommodated”. No changes were made as a result of the public’s responses and the public and

	<p>the Parish Council have been overwhelmingly ignored. (For example, there was no comment on the fact that the village doctors' surgery is over capacitated). The only change that has been made has been made as a result of consultation with the promoter of the site.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	14	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1)(c) Appendices N and O (July 2018 Submission version) (WHSAP/11)				
<b>Please give details of why you support or do not support the updates to the</b>	Page 231. states Land south of Westbury Road, Bratton (SHELAA site 738):				

<p><b>associated evidence documents.</b></p>	<p>The site is taken forward for further assessment following the submission of new access evidence. Access to the site is considered to be achievable although delivering acceptable sight lines would require significant engineering operations.</p> <p>However, development at two sites in Bratton would not reflect modest growth, therefore the least sustainable site (this site) is rejected at Stage 4 of the process.</p> <p>This statement presumes site 321 is a foregone conclusion rather than considering 321 and 738 based on their own merits. The reason stated above for rejection is different to that in the Community Area Topic Paper – Westbury. It's appears that different, but also weak, reasons are being cited to eliminate site 738 from the fair democratic process.</p> <p>Reinstate site 738.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	15	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Associated evidence documents		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1)(c) Appendices N and O (July 2018 Submission version) (WHSAP/11)				



<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	<p>Page 231. Document states,  <b>Land at Pear Tree Orchard, Bratton (OM007)</b> <b>The site is fully within Bratton settlement boundary and is therefore excluded from the site selection process and removed at Stage 2a of the process.</b>  This site provides housing potential, and this fact should not be ignored before allocating land beyond existing village boundary limits.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	16	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1)(c) Appendices N and O (July 2018 Submission version) (WHSAP/11)				
<b>Please give details of why you support or do not support the updates to the</b>	Para 21.104, states,				

<p><b>associated evidence documents.</b></p>	<p>“There is not a well progressed neighbourhood plan in the village and the Council is unable to rely on a neighbourhood plan to deliver allocation(s).”</p> <p>A neighbourhood plan IS being developed by Bratton Parish Council and it's understood council owned land is available within the village limits for development.</p> <p>It cannot be stated in this document, at this time, that insufficient information is available. Your conclusions appear to have liaised with the site promotor but failed to liaise with the Parish council who represent the residents.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	17	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1)(c) Appendices N and O (July 2018 Submission version) (WHSAP/11)				
<b>Please give details of why you support or do not support the updates to the</b>	Para 21.104, last bullet point states:				

<p><b>associated evidence documents.</b></p>	<p>“The Plan requires that improved connections to adjoining public rights of way BRAT24 and BRAT25 should be facilitated through any subsequent development proposals.”</p> <p>‘Facilitated through’ implies diverted to suit the developer. These are historic rights of way following existing boundary alignments. There is no justification to divert. BRAT24 and BRAT25 should remain in situ and the Site Allocation documents amended accordingly.</p> <p>Sufficient land exists under this land’s Title to accommodate the proposed dwellings AND accommodate the historic PROWs as existing.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	18	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>		Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)	<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	Page 68, Table G6 refers to 40 dwellings. This is inconsistent with other documents.	
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	19	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				
<b>Please give details of why you support or do not support the updates to the</b>	Page 17, Table 6.7. Site 738 removed at stage 4a. I do not support this removal.				



<b>associated evidence documents.</b>	<p>This is unjustified based on the reason given. Both sites 321 and 738 acquired similar merit in evaluation to this stage. Creation of cycle/pedestrian access is achievable and 738 and remains a viable site.</p> <p>Please reinstate 738.</p>		
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	20	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Associated evidence documents		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				
<b>Please give details of why you support or do not support the updates to the</b>	Page 17, Table 6.6. At Stage 4a site 32 is shown to have capacity for 32 dwellings.				

<p><b>associated evidence documents.</b></p>	<p>Page 18, Table 6.8 shows a site allocation of 40. Elsewhere, in the Sustainability Appraisal Report it is stated as 35.</p> <p>40 represents considerable overcrowding with inadequate parking for around 80 vehicles.</p> <p>The documents are inconsistent and therefor misleading.</p> <p>Be accurate.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	21	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Non Technical Summary (NTS) (EXAM/02B)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p>Page 14, regarding land off the B3098 Bratton, refers to 35 dwellings, modified from 40.</p> <p>In the Wiltshire Housing Site Allocation Plan – Sustainability Appraisal Report, page 254 this figure is 32.</p> <p>The documents are inconsistent, inaccurate and therefore misleading.</p>				

<b>Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	22	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		Sustainability Appraisal September 2018 - Main Report (EXAM/02A)	<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	Paragraph 7.13.7, page 254 states the 1.33ha site has capacity for 32 dwellings. Elsewhere, in other supporting documents, for example - Wiltshire Housing Site Allocation Plan Sustainability Appraisal Report, Non-Technical Summary, the developer is seeking to place 35. The reports are inconsistent, misrepresentative and misleading.	
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	23	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>		Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology (July 2018 Submission version) (TOP/02)	<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	Appendix 1, Page 29. In the autumn of 2017 Bratton Parish Council raised objections and withdrew its support for the site 321 proposal. This is not reflected in any of the September 2018 documents. You appear to have	



			<p>consulted with the site 321 promotor but failed to take into account Bratton Parish Council's September 2017 objection and opinion regarding this site's potential development.</p> <p>Please update the documents to include this critical information.</p>
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	24	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>		Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology (July 2018 Submission version) (TOP/02)	<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	Appendix 1, Page 26. It is inaccurate to state Bratton comprises 819 dwellings. In 2011 the census identified 512. The document is a misrepresentation of the village size. The proposed addition of 35 dwellings represents	

			<p>an 8% growth. That's significant error was highlighted during the 2017 consultation and never rectified.</p> <p>The document needs to be accurate.</p>
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	25	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>		Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology (July 2018 Submission version) (TOP/02)	<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	Appendix 1, Page 30. At Stage 2 site 321 was under consideration for 32 dwellings. In other documents this number is 35. Where is the justification to increase from 32 to 40, then reduce to 35? Consistency is required across all documents.	

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	26	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1129633	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	WCC is proposing to delete the site at Crudwell (Ridgeway) from the WHSAP. I fully support this proposal.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	27	<b>Consultee</b> Idmiston Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1185571		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Topic Paper 2 Site Selection Process Methodology (July 2018 Submission version) (TOP/02)				
<b>Please give details of why you support or do not support the updates to the</b>	Wiltshire Housing Site Allocations Plan (WHSAP)				



**associated evidence documents.**

**Idmiston Parish Council Consultation Response**

We, The Idmiston Parish Council, have been asked to respond to the consultation request regarding the WHSAP proposed changes through to 2026.

The Idmiston Parish Council have a “made” Neighbourhood Plan, which following an independent examination and a positive referendum result, Wiltshire Council decided to formally adopt. The Idmiston Neighbourhood Plan (IPC NP) now forms part of the Development Plan for Wiltshire and the policies in the plan will be given full weight when assessing planning applications that affect land covered by the plan.

The IPC NP identified development sites as having either been identified in Wiltshire Strategic Housing Land Availability Assessment (SHLAA) exercises, or had been the subject of previous planning applications. With a recognised Parish housing target share of 32 new houses by 2026 (share of the Wiltshire total), c.74 sites were proposed and to-date c. 48 houses have received either outline or full planning permission.

Wiltshire Council Planning have since confirmed that further scale planning will not be supported in the Parish for the period through to 2026 owing to the over delivery of the housing target to-date - [REDACTED], Wiltshire Council Planning, 11.09.18:

“...Our view is that with the granting of planning permission of the Horfield development which is for 16 dwellings and what we consider is an extant consent at the Chalk House development which is for 20 dwellings, the Neighbourhood plans commitment to provide approx 32 houses has now been met. Therefore in principle we as planning officers would have in principle objections to any further sites allocated in the neighbourhood plan coming forward or any other sites outside the villages coming forward for housing. This would be through to 2026...”

The Idmiston Parish Council supported by the IPC NP and with the three villages in the Parish - Porton Large Village status, Golmeldons Small Village Status and Idmiston Small Settlement status does not support the inclusion of the SHLAA sites in the WHSAP and refer to the IPC NP for development through to 2016.

The “made” IPC NP forms the local lead for the Development Plan for this period (to 2026).

We summarise below our understanding of the core principles of the WHSAP:

**The Purpose of the Plan**

1.1 The purpose of the Wiltshire Housing Site Allocations Plan (‘the Plan’) is to:

Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and Allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire’s three HMAs over the period to 2026.

[SEE TABLE IN ATTACHMENT]

[SEE TABLE IN ATTACHMENT]

**Relationship with Neighbourhood Planning**

	<p>2.21 There are at the moment over sixty Neighbourhood Plans either being prepared or completed in Wiltshire and many more plans are likely over the years ahead. Many of these involve identifying land to meet the need for new homes. Their role in meeting housing requirements will become more significant alongside the Plan.</p> <p>2.22 It is a priority of both Government and the Council that planning controls pass to local communities so they can develop their own local vision of sustainable development. Parish and Town Councils have been consulted on the review of settlement boundaries. The work being done on Neighbourhood Plans influences the selection of sites(8) and where Neighbourhood Plans have been 'made' or are well advanced the Plan leaves decisions on the scale and locations for growth in settlements to the communities concerned.</p> <p>4.4 The WCS proposes much more modest levels of housing provision at Large Villages as reflected in the indicative scales of housing for each community area. Some new development, to meet local needs, may be appropriate at some of the designated Large Villages within these rural areas either through sites allocated in the Plan or by Neighbourhood Plans produced by the local community.</p> <p>4.15 The future development of some Large Villages has already been thoroughly considered by Neighbourhood Plans. Neighbourhood planning addresses the housing needs of a settlement in accordance with Core Policy 1 of the WCS. It is unnecessary for the Plan to supplement local consideration and SHLAA sites at Large Villages where Neighbourhood Plan preparation is at an advanced stage are not considered reasonable alternatives.</p> <p>[SEE TABLE/EXTRACT IN ATTACHMENT]</p>		
<b>Supporting documents (Please see Objective)</b>	5101948		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	28	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1185606	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>In line with the Governments Localism agenda, Crudwell Village is developing its Neighbourhood Plan (referred to hereafter as the Plan): the detailed community-led research underpinning the Plan indicates that a maximum of 20-25 new dwellings is needed by 2026 and situated throughout Crudwell Village rather than on a single site. The Plan has also identified that there is no 5 year housing land supply problem within the Housing Market Area that applies to Crudwell Village, thus supporting the Proposed Change (PC92) to Wiltshire Councils Housing Site Allocations Plan (WHSAP). In addition, the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. A development of the size and siting proposed under 18/05429/FUL is clearly contrary to the strategic need identified in the Plan. In addition, the proposed site is outside Crudwell Villages settlement boundary, which would be contrary to Wiltshire Councils adopted and emerging development plans. In line with these issues, and following the Full Council meeting in early July, Wiltshire Council has recommended that 18/05429/FUL (Ridgeway Farm) be removed from WHSAP. Supporting the Proposed Change (PC92) to WHSAP would not only support the needs and wishes of Crudwell Village, as identified in the Plan, but would also support Wiltshire Councils own recommendation to remove the proposed site from its Housing Site Allocations Plan. I therefore support the Proposed Change (PC92) to WHSAP. To the best of my knowledge, the consultation material is sound and legally compliant.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	29	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1185678	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposed change to remove the Ridgeway Farm site in Crudwell from the Wiltshire Housing Site Allocations Plan , on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	30	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1135102	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	It seems that the neighbourhood planners are forging ahead with other options for the few houses that crudwell are needing to build ...and that the proposed site at Ridgeway Farm, crudwell has been removed from the WHSAP which I fully endorse.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	31	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1185580	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [H2.4]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>I am writing to you regarding the proposed development: Housing Allocation H2.4 Church Lane, Trowbridge Presently you have come to 2nd consultation period where in we have until 5th November to object further to the violation of the green fields area where permission has been requested. Church Fields is currently a wildflower meadow adjacent to the Lambrok Stream that is a prominent wildlife habitat that includes various insects &amp; mammals. Just last week my husband &amp; I had the pleasure of witnessing a deer in the church fields. Development on this site will severely damage the ecosystem that is present &amp; will cause catastrophic changes to the natural environment which at present remains undisturbed by human activity. I strongly believe that construction on this site will be devastating to the local wildlife that call this home &amp; has &amp; will strongly affect the local residents of this town. This development will not only affect the houses directly surrounding the site but will also affect everyone who is a regular user of the neighboring country park who do not want the un-spoilt views to be replaced by yet another housing estate. Areas such as Church Fields with delicate ecosystems such as this should be preserved, protected &amp; cared for, not threatened. The construction of this development will have an impact on the wildlife currently calling Church Fields home, it will not only frighten the wildlife, but quite possibly kill any wildlife that cannot escape fast enough. The construction site run off will contaminate &amp; damage the ecosystem in the stream killing the currently thriving insects &amp; amphibians that rely on this freshwater stream being just that, fresh water. As per the EXAM.01 Schedule of Proposed Changes - Consultation Document: Please review my comments. 1. ID:1129173/ 402467 REP: 1523 Ancient hedgerows - The hedgerows surrounding this site were all in existence before 1850 (through maps this is easily clear to all) &amp; this means they are therefore protected under the Hedgerow Act. See attachment to email. 2. There is contradiction in the approach to discounting sites based on the settlement boundary. 3. The Council could not have taken into account the heritage, environmental &amp; flood importance of the site at the stage when they discounted sites in 2015-2017 as this was brought to their attention in Sept 2017. 4. This site is already subject to sever flooding on an annual basis, 5. ID: 395940 Rep: 2967, 2968, 2969: Surface water &amp; housing water will be directed into drainage pipes to an attenuation pond where this water will then be filtered directly into the freshwater stream via smaller pipes. When asked about contaminants &amp; pollutants from the attenuation pond the response I received was I dont know from Senior Urban Designer [REDACTED]. After a follow up email as requested I have this: The primary purpose of an attenuation pond is to help control surface water runoff and ensure the flood risk of a site is not increased. This statement does not provide reassurance for the residents, this is a hope that the flood risk wont increase, so it will not prevent the flood issues that are already evident on this site which are currently of no threat to homes &amp; is in direct conflict to the ID as stated above. It is only a secondary function to filter out potential pollutants which is something we have not been asked about before Have not been asked about before</p>				

	<p>RPS have put the safety of the ecosystem in the hands of a drainage consultant rather than an environmentalist or ecologist who would have a much larger understanding &amp; a wider scope of knowledge on the requirements needed to protect this area. Southwick country Park hired their own Ecologist who was less than impressed with the methods proposed by RPS. 6. ID: 903251 Rep: 239: Traffic is currently an issue on Saturdays for the Park Run, the car park overflows, cars park along the A361 causing obstruction on a main A road, with a new junction for site access to this area this will undoubtedly cause more dangerous &amp; extreme issues. The proposed placement for this junction is just below the brow of the hill, a blind spot for traffic that will need to pull out of this new junction. With the above issues in mind I implore you to please reconsider any development on this green field site &amp; instead, protect this area of natural importance &amp; beauty for current &amp; future generations.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5106069</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

Comment ID:	32	<b>Consultee</b> <b>Person ID:</b> 1183327	<b>Agent</b> <b>Person ID:</b>	Do you consider the Proposed Change to be legally compliant?	Yes
				Do you consider the Proposed Change to be sound?	Yes
Identify subject of representation	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?		
Identify Proposed Change Reference Number	PC10				
Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not	PC 10 Agree				
Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:			Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).		
Please state which evidence document this representation relates to:			Please give details of why you support or do not support the updates to the associated evidence documents.		
Supporting documents (Please see Objective)					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	33	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1183327	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>		Wiltshire Housing Site Allocations Plan Topic Paper 3 Housing Land Supply Addendum (July 2018 Submission version) (TOP/03C)	<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	4.2 Need to give more priority to rural settlements outside of defined settlement boundaries for windfall sites 5.8 Keep a data base of windfall sites of less than 1/2 hectare in case of shortfall in housing	

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

Comment ID:	34	<b>Consultee</b> <b>Person ID:</b> 1183327	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
				<b>Do you consider the Proposed Change to be sound?</b>	Yes
Identify subject of representation	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
Identify Proposed Change Reference Number	SBR PC27				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Boundaries only relate to the large village of Hilperton. There is no reference to the rural settlement of Whaddon which is in the parish boundary. Geographically it sits closer to Holt and Semington. The material is generally sound but is limited to the main settlement in Hilperton. No consideration has been given to the very rural hamlet of Whaddon which lies within the Parish boundary. Young people and people reaching retirement age may wish to reside in the hamlet and therefore housing needs in this area should be considered.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	35	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1183327	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC13				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC13 Elizabeth Way - reduce no. of houses to 205				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	36	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1183327	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC19				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC19 - consider growth in very rural settlements to supply housing for young people and retired people wishing to downsize but who wish to remain in their rural environment				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	37	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1186289	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	In line with the Governments Localism agenda, Crudwell Village is developing its Neighbourhood Plan (referred to hereafter as the Plan). Consultation for Reg 14 is planned for Nov 18 and Reg 16 is planned for early spring. The detailed community-led research underpinning the Plan indicates that a maximum of 20-25 new dwellings is needed by 2026 and situated throughout Crudwell Village rather than on a single site. The Plan has also identified that there is no 5 year housing land supply problem within the Housing Market Area that applies to Crudwell Village, thus supporting the Proposed Change (PC92) to Wiltshire Councils Housing Site Allocations Plan (WHSAP). In addition, the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. A development of the size and siting proposed under 18/05429/FUL is clearly contrary to the strategic need identified in the Plan. In addition, the proposed site is outside Crudwell Villages settlement boundary, which would be contrary to Wiltshire Councils adopted and emerging development plans. The Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future. I therefore support the Proposed Change (PC92) to WHSAP. To the best of my knowledge, the consultation material is sound and legally compliant.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	38	<b>Consultee</b> Castlewood Properties Ventures Ltd	<b>Agent</b> Planner Turley	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1130978	<b>Person ID:</b> 1131263	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC46				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Introduction We are responding to this consultation in respect of our clients land interest at Underhill Nursery in Market Lavington which was previously proposed allocation H1.2 in the Wiltshire Housing Site Allocations Plan (WHSAP). The proposed amendment PC46 and its consequential changes (PC1, PC5, PC7, PC8, PC11, PC15, PC17, PC18, PC38, PC39 and PC45) look to delete proposed allocation H1.2 in its entirety. This follows a decision by the Councils Cabinet to defer the allocation of housing sites in Market Lavington to the Market Lavington Neighbourhood Plan (MLNP) on two grounds, which we discuss below. Background It should be noted that the Councils Planning Policy Officers were previously supportive of proposed allocation H1.2, hence its inclusion in the Regulation 19 Pre-Submission Draft Plan (Summer 2017). The allocation combined parts of two adjacent land parcels on the edge of Market Lavington which had been identified in the Wiltshire Strategic Housing and Employment Land Availability Assessment (SHELAA) (2017) as being suitable, available, achievable and deliverable, as well as being developable in the short-term for housing. Combining the two SHELAA sites was considered to provide an opportunity for the holistic planning of the sites and would make use of previously developed land to prevent the need to encroach on the open countryside. The proposed allocation site was considered to be in a sustainable location with good access to the centre of Market Lavington and its facilities, which include a primary school and health centre. In addition we submitted various technical evidence reports to the Council to support our clients case for the redevelopment of the site for housing. Together the Councils findings, as well as our supporting technical evidence, demonstrate that proposed allocation H1.2 would be a logical development site to meet the housing needs of Market Lavington, as a Local Service Centre, which the Pre-Submission Draft Plan identified as the second tier of the Devizes Community Area settlement hierarchy. Despite the decision by the Councils Cabinet, we believe that proposed allocation H1.2 remains an exemplary candidate for inclusion in the WHSAP as a site for housing. Then at a meeting of the Councils Cabinet in July 2018, Members resolved to remove proposed allocation H1.2 along with other site allocations in Market Lavington from the WHSAP. Two arguments were put forward to justify these amendments. The first justification posited contends that there is a sufficient five year housing land supply position in the East Housing Market Area (HMA) and this negates the strategic need for the WHSAP to allocate residential sites in Market Lavington. The second being that significant progress has now been made in the preparation of the MLNP. For the reasons we will set out below, we consider this approach of deferring residential allocations to the MLNP to be unsound and recommend that proposed allocation H1.2 should be reinstated. Representations We fervently disagree with the Councils position, which is that a five year housing supply in the East HMA removes the strategic need to make residential allocations in Market Lavington. This would be inconsistent with national policy as paragraph 47 of the NPPF (2012), which requires local planning authorities to identify a supply of specific, developable sites</p>				

or broad locations for growth, for years 6-10 and, where possible, for years 11-15 . National planning policy is therefore clear that the Council must look at its residential allocations beyond five years, so as to ensure there is a consistent pipeline for bringing forward new residential development. Given that the Councils Housing Land Supply Statement Addendum July 2018 Submission Version (ref: TOP/03C) indicates there is still an indicative residual requirement for the remainder of the Devizes Community Area, outside Devizes itself, of at least 81 dwellings during the remainder of the Plan period up to 2026 the Council should still be looking to identify site allocations. To not allocate sufficient sites would mean the Councils approach would fail to fully meet its identified housing needs and as such would not be positively prepared. Rather than allocate sufficient sites through the WHSAP, the Councils proposed approach is to now defer any allocations in Market Lavington to the MLNP. Whilst we recognise that Neighbourhood Plans have the option of allocating land for housing, this must be in support of the strategic housing delivery targets for that area as explained in paragraph 184 of the NPPF (2012). In the Devizes Community Area Topic Paper July 2018 Submission Version (ref: CATP/06) it states at paragraph 2.13 that if a neighbourhood plan is sufficiently advanced, having at least submitted a draft neighbourhood plan to the Council for a Regulation 16 Consultation , then this includes information on whether it is allocating housing and reviewing settlement boundaries (our emphasis). Yet immediately after this, in Table 2.4, it is established that the MLNP has not yet progressed to the Regulation 16 Consultation stage. Whilst it is identified that the MLNP will incorporate housing allocations, there is no mention of the quantum or location of housing proposed to be allocated. This appears contradictory to the Councils own reasoning for making amendment PC46 which argues that progress on the MLNP has been sufficient to defer the consideration of housing allocations. In fact the MLNP is currently only going through its second round of Regulation 14 Consultation, which closes on 30th October 2018. This is being carried out to take account of comments and recommendations from the first round of Regulation 14 Consultation which took place between March and May 2018. Given the Market Lavington Neighbourhood Area designation was decided some time ago (in March 2015) it is clear that the MLNP has taken a significant length of time to emerge as it has now taken over 3.5 years just to reach a second round of Regulation 14 Consultation. We therefore contest the Councils position, which is that sufficient progress has been made on the MLNP to allow for the deferral of housing allocations to it. Indeed it is unclear when a Regulation 16 Consultation will be carried out let alone Examination. Although the second round of Regulation 14 Consultation for the Market Lavington Neighbourhood Plan does allocate sites in draft, this includes one not previously submitted to the Wiltshire SHELAA, namely North of Spin Hill (MLNP ref: Site 2). Therefore the suitability of this site has not yet been formally assessed by the Council and the first opportunity for it to now do so will be the MLNP Regulation 16 Consultation. We do not consider the North of Spin Hill site to be a robust allocation as it is remote from Market Lavington and a significant distance from the villages settlement framework boundary, as established in the Wiltshire Core Strategy. Given the lack of pedestrian routes or public transport options between the North of Spin Hill site and Market Lavington, it will encourage the use of the car to access facilities and services in the village which is contrary to the core planning principles established in paragraph 17 of the NPPF (2012) thereby rendering the site unsustainable. Furthermore another draft allocation in the Regulation 14 Consultation, The Spring (MLNP ref: Site 4, SHELAA ref: 3268), was discounted by the Council in the updated Devizes Community Area Topic Paper (ref: CATP/06) and not considered a preferred site. The development of The Spring site was considered to involve the loss of land that contributes to the rural character at the approach to the village. Also any measures to achieve heritage objectives and mitigate surface water flooding (if possible) would substantially limit the developable area, such that the benefits of developing the site were considered marginal and did not outweigh the adverse impacts. Based on the Councils own assessment of The Spring site, we consider that this draft allocation is unlikely to deliver in the way the authors of the draft Neighbourhood Plan envisage. Therefore, given that at least two of the four draft allocations in the MLNP are flawed, we consider that the MLNP will run into significant issues in the future. One scenario could be that the questionable allocations are removed from the MLNP. However, this would have the consequence of leaving Market Lavington with a lower number of allocated homes than would meet its needs as a designated Local Service Centre and second tier settlement within the Devizes Community Area. Another scenario could be that the described draft allocations result in the MLNP failing at Examination (or even failing to pass the Regulation 16 stage). This would result in further delays to the MLNP, thereby further hindering the allocation of any housing in Market



	<p>Lavington. Whilst we recognise it is not for the Inspector of the WHSAP to examine the MLNP, and its draft allocations, we do consider that the Inspector should take note of these issues as evidence that the Councils decision to defer potential housing allocations to the MLNP is an inappropriate strategy. The most appropriate strategy would be for the WHSAP to allocate residential development sites in Market Lavington and by not doing so the WHSAP is unjustified. By deferring site allocations to the MLNP, the WHSAP is deferring the deliverability of housing in Market Lavington to the MLNP and this is not regarded as likely to be effective given the potential delays we envisage the MLNP will face as a consequence of proposing to allocate sites that are unsustainable and unlikely to deliver as anticipated. Conclusion In view of our representations above, there is substantial evidence that the proposed modification PC46 and its consequential changes have made the WHSAP unsound contrary to paragraph 182 of the NPPF (2012). In order to remedy this and make the WHSAP sound, we consider that proposed modification PC46 should be removed, its consequential changes subsequently amended and proposed allocation H1.2 be reinstated so that it may form part of the adopted Development Plan for Wiltshire. In order to effectively put this case before the Inspector and address any questions they may have, and to also respond to any argument the Council may make for proceeding with proposed modification PC46 (and its consequential changes), we consider it necessary to attend the Examination Hearings in a speaking capacity. For reference, we append a full set of additional details as follows. These reports and drawings concern the proposed development of the site and provide information regarding constraints; Illustrative Layout Option 1 Illustrative Layout Option 2 Vision Document Pre-Application Statement Highways and Transport Access Options Rev A (which reflects the most up to date access strategy) Pedestrian Improvements Preliminary Ecological Appraisal Baseline Landscape Appraisal Heritage Desk Based Assessment Flood Risk and Drainage Technical Note</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	39	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1134604	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I agree that the Ridgeway Development at Crudwell should be removed from the plan. It is extremely large and out of keeping as a development for the village. There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" to meet local needs. Furthermore the site pedestrian access is unsafe for getting to the village to access the school or buses. The lane does not have enough space for cars to pass without pulling in and there is no footpath for all but the shortest part of the lane. The Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. Finally the Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	40	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1135864	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I agree that the Ridgeway Development at Crudwell should be removed from the plan. It is extremely large and out of keeping as a development for the village. There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" to meet local needs. Furthermore the site pedestrian access is unsafe for getting to the village to access the school or buses. The lane does not have enough space for cars to pass without pulling in and there is no footpath for all but the shortest part of the lane. The Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. Finally the Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	41	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1130479	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	WCC is proposing to delete the site at Crudwell (Ridgeway) from the WHSAP. I fully support this proposal.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	42	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1124620	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposed change to remove the Ridgeway Farm site from the Wiltshire Housing Site Allocations Plan, on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	43	<b>Consultee</b> Development Liaison Officer, National Grid National Grid	<b>Agent</b> Amec Foster Wheeler E&I UK	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1121272	<b>Person ID:</b> 1146750	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [No comment]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Wiltshire Council: Housing Site Allocations Plan SUBMISSION ON BEHALF OF NATIONAL GRID National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	44	<b>Consultee</b> Sport England	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 987760		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [General]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Thank you for consulting with Sport England on the Wiltshire Housing Site Allocations. Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport. Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future. We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/">http://www.sportengland.org/facilities-planning/planning-for-sport/</a> Site allocations No sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field unless it is in line with Wiltshire adopted playing pitch strategy. I have had difficulty locating sites which are referred to in the documents due my lack of local knowledge and lack of postcodes. Site plans would have been of great assistance. <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/other-design-guidance">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/other-design-guidance</a> Thank you once again for consulting Sport England.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	45	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1143253	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC31				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the consultation material as it follows the published process and is in harmony with the wishes of the community as expressed through the Codford Parish Council. I believe the proposed changes made in Codford are legally compliant and sound. While the documentation published over the last 4 years has been detailed and numerous we focus on the following;- 1/The 3nr proposed changes stated in the consultation on changes between 15 th May to 11 th June 2018 were fully supported by the Codford Parish Council. These same changes were recommendations expressed by the Codford Parish Council when engaging with the informal settlement boundary review 28 th July to 22 nd September 2014. These changes are reflection of community involvement. 2/ The narrative stated in table SBR PC31 reference 28 and 28.1 follows the adopted methodology for reviewing the settlement boundary, demonstrates an understanding of the local geography and the close relationship of existing properties to the built environment. 3/ The changes made benefit the village and will improve the social wellbeing of the community by removing 20 years of stagnation through dereliction, is an effective use of the land were the existing use has become redundant, will make a positive economic contribution to the village while having minimum impact on the environment.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>



<b>Comment ID:</b>	46	<b>Consultee</b> Clerk Codford Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1143232		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC31				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Following our telephone conversation yesterday, I have attached the scheduled proposed changes for Codford PC; SBR PC31, to which Codford PC has no objection. I confirm that Codford PC would like to be notified that the ensuing Inspector's Report, has been published. And to also be notified When the Wiltshire housing Site allocations Plan has been formally adopted.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5122729				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	47	<b>Consultee</b> Robert Hitchens Ltd	<b>Agent</b> Pegasus Planning Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 841197	<b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC119				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>PC119 amends footnote 22 so that the settlement boundaries have been updated to take account of the implemented planning permissions up to April 2017. The previous version of the footnote referred to since 2016 . However, the settlement boundaries have not been updated to reflect the changes we proposed in response to the consultation on the Pre-Submission Draft. Pegasus submitted representations so that the settlement boundaries of Calne, Melksham and Westbury should be amended to reflect planning permissions. These changes have not been taken on board, so consequently the statement in the Focussed Changes is inaccurate, the settlement boundaries do not reflect implemented planning permissions up to 2017. Paragraph 4.13 of the WCS allows for the review of the existing settlement boundaries through the Wiltshire Housing Site Allocations Plan. Paragraph 4.15 states that: these settlement boundaries will also be reviewed as part of the Wiltshire Housing Site Allocations Plan as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly (emphasis added) reflect building that has happened since they were first established. (my emphasis). In some cases these are clearly out of date as they do not reflect recent planning permissions. Topic Paper 1 Settlement Boundary Review Methodology states that as the boundaries were not altered in the Wiltshire Core Strategy and they relied on the district local plan boundaries. Para 1.3 states that the Council has undertaken a comprehensive review of the boundaries to ensure they are up-to-date and adequately reflect changes which have happened since they were first established. The Plan amends settlement boundaries where necessary. It is also the prerogative of local communities to review them through the preparation of neighbourhood plans. It is noted that the three case studies referred to in Topic Paper 1 that Winchester City included in the settlement boundary Built/ commenced allocations/ planning permissions . Purbeck includes Uses and buildings (including sites with unimplemented planning permission) that have a clear social or economic function. Kettering Borough Council includes Existing commitments for built developments. It is noted that the Wiltshire Council draft settlement boundary methodology included Both built and extant planning permissions for residential and employment uses for areas which are physically/ functionally related to the settlement. However, following consultation with the Parish and Town Councils who disagreed that the settlement boundary should include allocations, development proposals and unimplemented planning permissions as those who objected to the inclusion of sites with planning permission considered that many planning permissions never get built out and that the final built form may differ substantially from the original permission; the methodology was changed. Only for those planning permissions that have commenced are included in the settlement boundary as they consider that there is much greater certainty. The Topic Paper concludes Therefore, the revised settlement boundary review methodology will include within the settlement boundary built or commenced planning permissions but exclude all unimplemented planning permissions. Nevertheless, it is</p>				

	<p>recognised that settlement boundaries represent a snapshot in time. Unimplemented planning permissions subsequently built out can be included within a future review. The revised settlement boundaries proposed for Melksham, Westbury and Calne are not up to date and do not reflect recent planning permissions to RHL references 15/12454, 14/09262/OUT, 14/11179/OUT land at Prince Charles Drive, Calne respectively and also land at Low Lane Calne LPA reference 17/00679/OUT). The settlement boundary of Melksham should be revised to reflect planning permission 15/12454 land to the north of Sandridge Common, Sandridge Road, Melksham, where development has started. Likewise the settlement boundary of Westbury should be revised to reflect planning permission 14/09262 which was granted on appeal in July 2016 ( 300 dwellings, land north of Bitham Park, Trowbridge Road, Westbury) which has started. It is noted that the proposed new settlement boundary includes land to the west of Trowbridge Road which was granted permission and is under construction ( 220 dwellings 13/03568), but not land to the east of Trowbridge Road. It is noted that the settlement boundary is proposed to be altered to reflect earlier planning permissions at Calne, namely land off Sandpit Road and land south of Abberd Lane, which have been built and under construction; however recent planning permissions land at Prince Charles Drive ( 14/11179 for 130 dwellings) and land at Low Lane Calne (17/00679 for 165 dwellings) are not reflected in the changes to the settlement boundary. Building has commenced on Land at Prince Charles Drive. The issue is what harm would there be to the settlement strategy of updating the settlement boundary to reflect the recent planning permissions in addition to those under construction. These sites are after all considered against the housing supply and are consistent with the settlement strategy and are in some cases under construction. The comments above are also applicable to Chapter 6 and the Community Area Topic Papers.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	48	<b>Consultee</b> Robert Hitchens Ltd	<b>Agent</b> Pegasus Planning Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 841197	<b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC51				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>An objection is made to PC51 ie Policy H2 Table 5.3. The updates reflect the amendments to the housing site capacities /densities of allocations at Trowbridge and the removal of a housing allocation at Crudwell. Our concerns expressed in relation to Policy H2 and paragraphs 4.44 4.61 and paragraphs 5.43 5.44 in response to the consultation in September 2017 have not been addressed ie about the deliverability of sites at Trowbridge. On review of the evidence base: EXAM/03 ADDENDUM TO Wiltshire Housing Site Allocations Plan Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations Original Addendum: 4 May 2018 Minor factual update to support the consultation on the Councils Schedule of Proposed Changes September 2018 Wiltshire Housing Site Allocations Plan Topic Paper 3 Housing Land Supply Addendum (July 2018 Submission version) (TOP/03C); Wiltshire Housing Site Allocations Plan Topic Paper 4 Developing Plan Proposals Addendum (July 2018 Submission version)( TOP/04C) Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a); Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury Community Areas Prepared by Wiltshire Council and The Environment Partnership (June 2017) (WHSAP/20) There appears to be no justification apart from in the Addendum to the HRA September 2018 paragraph 3.3.3 which refers to increasing the housing numbers at four allocations in Trowbridge which take the number of dwellings proposed at Trowbridge from 800 to 1,050 on greenfield sites. The paragraph states for example for the site at Elizabeth Way where the number of dwellings are proposed to increase from 205 to 355 ie a 73% increase, states: Below Middle Lane the allocation lies within the consultation area for Bechsteins bats and it seems that an increase of this scale could require this area to become urbanised to some degree. Any subsequent design solution to support development would need to ensure the provision of low lux lighting, dark corridors, open space and protection of existing habitat. Such measures have been incorporated into the draft Plan. It is noted that Natural England in their reponse to the Plan in 2017 raised concerns. Paragraph 3.3.2 of the Addendum to the SA (September 2018) states that a precautionary approach should be taken in determining a what constitutes key bat habitat. Habitats such as hedgerows, tree planting and streams will be assumed to be of key importance to bats within the consultation zones and also outside them where strategic routes may link important roosts. Furthermore, there is the cumulative effect which is acknowledged in the Addendum, whilst a loss of habitat at site level may be of low significance it is the cumulative impacts at a landscape level. It is understood that a Trowbridge Bat Mitigation Strategy is being prepared and that Phase 1 is to be consulted upon and made available to support the Examination. Paragraph 3.3.5 of the SA {EXAM03} states: The work being undertaken is complex and requires iterative consultation with bat experts and planners to test the deliverability of proposals. The overall approach will be to safeguard key</p>				

	<p>habitat features on site and offset the loss of others by creating new habitat according to a metric. It is noted that the Addendum report at paragraph 3.3.8 states that the capacity of the sites has been calculated on the basis of 30 dph. The capacity of housing allocations has been calculated on the basis of 30 dph and excludes parts of the sites that are undevelopable due to environmental and heritage constraints. In principle, the density of development at each site could be increased without leading to impacts alone, as long as it can be demonstrated that: The principles in the TBMS for protecting key bat habitat on site can be met; and The landscape remains porous to bat movements to the same extent after development as it was prior to development. The Addendum report states that the original estimates for the capacity of the sites in the Pre-Submission Draft Plan were based on a low density and that there will be only marginal, or no change to the footprint of development and the extent to which it may impinge upon habitat areas. The Plan envisages that the TBMS will guide design and layout so that effects are mitigated, if necessary offsite, and no additional safeguards need to be incorporated into the Plan. However, paragraph 3.3.10 importantly acknowledges that: In view of the fact that the bats response to development is likely to be delayed and difficult to ascertain with confidence, this could suggest a need for phasing further development over and above the current draft and adopted allocation that might arise from the Local Plan Review. Otherwise there would be a risk that the capacity of the area to support the internationally important population of Bechsteins bats may be exceeded and as a result have significant adverse effects on the integrity of the SAC. However, this would be a matter for the Review to resolve and is not necessary to progress in this Plan. It appears that the evidence base does not justify the approach and that the sites are not only allocated but the density for the sites is proposed to increased. It is considered that the evidence base is incomplete and that until such time that this work is completed a precautionary approach should be applied and therefore the capacity of the sites should not be increased through the Focussed Changes. This should be a matter for the Local Plan Review. (The Review of the Core Strategy has been significantly delayed from the timetable in the LDS). Consequently, in order to support the delivery of housing in the Core Stragegy, which has to date not matched expectations, sites elsewhere in the HMA should be brought forward to ensure housing is delivered and an adequate housing land supply maintained in accordance with the NPPF. We have in our response to the Plan in September 2017 indicated that land to the north west of Melksham comprising 74.54 acres, land off Abberd Lane, Calne comprising 4.92 acres and adjacent area comprising 5.77 acres and land off Low Lane, Calne are available and deliverable in the plan period.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<p><b>submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	49	<b>Consultee</b> Robert Hitchens Ltd	<b>Agent</b> Pegasus Planning Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 841197	<b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC17				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC17 provide an update to Table 4.8 to reflect the latest position on housing land supply published in March 2018 with a base date of April 2017. It is noted that this has been updated to reflect the changes ie the proposed increase in densities on housing allocations at Trowbridge etc. In our previous representations to the Proposed Submission Plan in September 2017 we noted that Table 4.8 HMA 5 year land supply estimate 2017 2018 indicated that there would be in excess of a 5 year supply for the North and West HMA through to 2025/2026, in this year the housing supply fell to only 5.3 years. It is noted from Topic Paper 4 that the 5 year supply has been calculated on the basis that if a 20% buffer was required then a 5 year land supply could be met. Even in the year 2025/26 it would appear that the Council can demonstrate a 5 year land supply in the North and West HMA with a 5% buffer. However, what is not clear from Topic Paper 4 is the calculations behind these figures as no trajectory is available which reflects the Focussed Changes.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	50	<b>Consultee</b> Robert Hitchens Ltd	<b>Agent</b> Pegasus Planning Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 841197	<b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC15				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>PC15 updates Table 4.7 to reflect the latest housing land supply statement. The latest assessment of the developable supply which is available is contained in the Wiltshire Housing Land Supply Statement Update March 2018 (HLSS) with a base date is April 2017. It is useful to consider some of the components of supply identified in this report in order to assess the robustness of the Councils assessment. There are a number of sources of supply in the HLSS which should not be relied upon to deliver as outlined below. Windfalls It is noted that the figure for windfalls for the remaining plan period 2017-2026 has increased from 2,086 to 2,209 for North and West Wiltshire HMA. An objection is made to the approach to windfalls which has deviated from the approach in the adopted Wiltshire Core Strategy. The approach in the Core Strategy was found sound, (but conservative) by the Inspector. The Council are now using an approach which gives a higher figure and are relying on a greater number of large windfall sites than found sound by the Inspector. In the adopted Core Strategy the Council relied upon Method 1 (as set out in the July 2014 HLSS) ie for North and West Wiltshire over 5 years the windfall allowance was 583 dwellings. The Council are now using Method 3 from the 2014 HLSS (now referred to as Method A) which generates 980 dwellings over the 5 years. However, the consistent application of Method 3 / Method A shows how the number of windfalls has decreased over time ie from 1688 dwellings over 5 years to 980 dwellings over 5 years. This shows windfalls are declining and yet the Council persist with a method which is totally reliant on historic trends of windfalls. The Council are also allocating sites, therefore the capacity is reduced for windfalls as these sites will come forward as allocations. This would suggest that the number of windfalls will be below the declining historic trend. It is considered that going forward for the remaining plan period that there is an over reliance on windfalls, this together with the continued uncertainty over the sites proposed in Trowbridge where the density has been increased therefore demonstrates the need to consider increasing the number of proposed sites in the plan or at the very least to include reserve sites at sustainable market towns. Saved Local Plan Allocations The Council continue to rely upon the delivery of saved Local Plan allocations in the Table 4.7 of the HLSS, although the number of sites and the contribution from those sites has reduced to 123 dwellings in North and West Wiltshire HMA over the remaining plan period. The saved local plan allocations from the North Wiltshire Local Plan are: Quemerford House and Mill {3 dwellings} The saved local plan allocations from the West Wiltshire Local Plan are: Land off Oldfield Road, Westbury {30 dwellings} Station Road, Westbury Town {90 dwellings} These sites were allocated in June 2006 in North Wiltshire and in June 2004 in West Wiltshire. In the intervening 12/14 years these sites have not delivered and as such they are unlikely to provide a reliable source of supply in the future. Housing Land Supply There is a difference in the deliverable housing land supply from that set out in the Housing Land Supply Statement published March 2018 (base date April 2017). Table 2 states that the deliverable supply 2017-2022 for North and West</p>			

	<p>Wiltshire is 8,130 dwellings (this corresponds with Appendix 4 of the HLSS) however, when compared to Table 5.5 in Topic Paper 4 July 2018, the figure for the deliverable supply is less ie 8,086 dwellings. The figure in the HLSS in March 2018 comprises 7,680 dwellings from existing commitments and 450 dwellings in terms of emerging allocations. Clearly the figures for the emerging allocations do not reflect the increase in densities proposed as a result of the Focussed Changes as this took place after the HLSS was published. The figure in Table 5.5 of Topic Paper 3 comprises 7,680 from Table 3.3 in Topic Paper 3, July 2018 and the remainder is 406 dwellings reflecting the emerging allocations. It clear that the deliverable supply over the 5 years 2017-2022 is 44 dwellings less despite the increasing densities proposed in the Focussed Changes. There remains no up-to-date housing trajectory to support the Focussed Changes.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	51	<b>Consultee</b> Robert Hitchens Ltd	<b>Agent</b> Pegasus Planning Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 841197	<b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC13				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>PC13 Updates Table 4.5 to reflect the proposed increase to the number of dwellings at Trowbridge and Westbury. However, we have already objected to the sites identified to meet the shortfall at Trowbridge in our previous representations to paragraphs 4.44- 4.61 and para 5.43 5.44 of the Pre-Submission Draft in September 2017. The Proposed Changes retain the sites and furthermore increase the proposed number of dwellings at these sites. We have already expressed concern about the delivery of these sites and to increase the number of dwellings to these site to meet the HMA shortfall, although consistent with the Wiltshire Core Strategy does not appear to be adequately justified in the documentation published to support the Focussed Changes ( see comments on PC51) In our view if there remains a shortfall after the consideration of other sites at Trowbridge which would be considered consistent with the settlement strategy, then sites elsewhere in the HMA can be brought forward to ensure housing is delivered. Whilst there is no shortfall in the Melksham or Calne Community Area, (as evidenced in the respective Topic Papers even without taking into account windfalls) these market towns are both well placed to accommodate development that cannot be met in other areas in the HMA ( if there are no sites consistent with the settlement strategy in Trowbridge where there is a significant shortfall of 1,297 {Table 5.8 of Topic Paper 4 July 2018}). It is recognised that the SADPD must implement the settlement strategy set out in the adopted Wiltshire Core Strategy.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>No, the Proposed Change does not meet a previous objection</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	52	<b>Consultee</b> Robert Hitchens Ltd	<b>Agent</b> Pegasus Planning Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 841197	<b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC4				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC4 clarifies that Table 4.1 Housing Market Areas minimum to be allocated does not include an allowance for windfalls. Table 4.1 ( PC3) indicates that the latest position in terms of the number of dwellings to be allocated has increased from 571 to 1,109 over the remainder of the plan period; this reflects the delays in delivery in the Principal Settlements of Chippenham and Trowbridge, consequently the minimum indicative requirement has increased.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	53	<b>Consultee</b> Robert Hitchens Ltd	<b>Agent</b> Pegasus Planning Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 841197	<b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC3				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>As the Plan has already been submitted for Examination (on the basis of NPPF 2012) it is noted that for the purposes of Plan-making the housing land supply should be calculated in accordance with the NPPF 2012 (as recognized in paragraph 3.1 3.2 of Topic Paper 3 Housing Land Supply Addendum July 2018) according to paragraph 214 of NPPF 2018. However, for the purposes of development management (ie the consideration of planning applications) the new NPPF 2018 applies for the calculation of the housing land supply. Therefore as soon as the Plan is adopted the housing land supply will be different to that considered through the local plan examination. It is noted that Topic Paper 3 sets out the before position ie it excludes the proposed allocations. The position once allocations are taken into account is included in Topic Paper 4 Table 5.8 It is evident that since the Pre-Submission Draft of the Plan was published that at three Principal Settlements (of Chippenham, Trowbridge and Salisbury), delays have resulted in an increase in the indicative residual requirement. Chippenham and Trowbridge are located in the North and West Wiltshire HMA. Topic Paper 3 acknowledges that whilst there have been a number of large permissions granted in the 2017 monitoring year which will have assisted housing supply, the further delays in delivery on strategic allocations in the Wiltshire Core Strategy and the Chippenham Site Allocations Plan have counter-acted this. There is on the basis of the Councils current housing supply position an indicative remaining housing requirement of 1,109 dwellings (excluding proposed allocations) (Table 4.1). The Housing Land Supply for the North and West Wiltshire HMA excluding the Plans Proposed Allocations is 5.9yrs in 2017/2018 excluding any buffer (Table 3.3 Topic Paper 3). Once a 5% buffer is included this equates to a 5.6 year land supply. Table 3.4 demonstrates that without the proposed allocations the five year land supply position will decline below five years in the latter part of the plan period. The Housing Land Supply position including the Plans Proposed Allocations is set out in Topic paper 4 Table 5.6 which identifies a 6.21 year land supply at 2017. If sites are not coming forward as anticipated in the principal settlements in the North and West Wiltshire HMA, then together with the remaining indicative housing requirement there is a need for further allocations to be made to ensure a healthy land supply is achieved. In order to address the housing supply the Plan has increased the densities at the proposed allocations in Trowbridge as set out in Table 4.5 (PC13 of the Proposed Changes), so that the scale of housing proposed more than meets the requirements of the HMA for the plan period. It is noted that according to Table 5.4 of Topic Paper 4 Addendum July 2018 that there is now a surplus of 144 dwellings over the plan period excluding windfalls.</p>				
<b>Please state which of the Sustainability Appraisal</b>			<b>Please give details of why you support or do not support the updates to the</b>		

<b>documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	54	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1138113	Associate LPC (Trull) Ltd  <b>Person ID:</b> 899110	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	SBR PC27				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Enclosed with this submission is a document titled, Proposed Settlement Boundary Alteration . Plan 2 shows change to the settlement boundary that is requested at Hilperton. It is incumbent upon the Housing Site Allocations Plan, to make it sound, that new development is facilitated in sustainable locations to help bring forward the housing requirement as set out in Core Policy 2. The alteration of the settlement boundary for Hilperton to include both the land at the Grange, and the land immediately to the east with planning permission for 15 dwellings, will ensure that the principle of residential development on the land is acceptable. It is absolutely fundamental that the Housing Site Allocations Plan assists the Governments Objective, as set out in the National Planning Policy Framework to boost significantly the supply of housing . Core Policy 2 of the Wiltshire Core Strategy requires that a minimum of 42,000 dwellings is provided for within the period 2006 and 2026. Furthermore, when the Core Strategy was adopted in 2015 a key element of the housing delivery strategy was the provision of a significant amount of the minimum 42,000 through the Housing Site Allocations Plan. It is clear that new housing should be located in sustainable locations. In this respect it is highly material to note that as part of the preparation for the Core Strategy the Council undertook a Strategic Housing Land Availability Assessment (SHLAA). The land at The Grange (as shown on the enclosed Location Plan) is identified as Site Reference 291 in the SHLAA where under the detailed assessments of the SHLAA analysis, Potential Suitability Constraints show no prohibitive factors and under Suitability the assessment is suitable. The land at The Grange (as identified on the enclosed Site Location Plan) is also the subject of a current full planning application for 20 dwellings (Ref: 18/00985/FUL). This will be approved shortly following the completion of a S106 Agreement. Following my original Representation in September 2017 this is a significant material change that verifies the substance of my case about the suitability of the land for residential development, and its obvious inclusion within the Settlement Boundary Hilperton. A further highly material fact is that the land immediately to the east of my clients land received outline planning permission on Appeal in December 2014 (Ref: 13/06879/OUT) for the erection of 15 dwellings, and recently reserved matters has been granted to facilitate the erection of these dwellings. Taking account of the above factors there is now no logical reason why the Council should not alter the Settlement Boundary for Hilperton as requested by this Representation.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018)</b>		

<b>Regulation Assessment document this representation relates to:</b>		<b>or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

Comment ID:	55	<b>Consultee</b> <b>Person ID:</b> 1186831	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
				<b>Do you consider the Proposed Change to be sound?</b>	Yes
Identify subject of representation	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
Identify Proposed Change Reference Number	SBR PC 27				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Dear Sir/Madam I have studied the schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01) in relation to my property and confirm that the boundary line indicated is not correct and not in keeping with my historic ownership or extend of my domestic grounds and which have been taken from long term Ordinance maps I am therefore attaching evidential land registry extract [REDACTED] and offers historical ownership to this as part of my property as the full extent in conjunction with the land that is currently indicated by the historic outline. Google Earth Satellite images also verify our mature boundaries which have been in situ since 1995. I hope that you will be able to rectify this anomaly and place the correct boundary line to my property, please. Kind Regards [REDACTED]				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5118147				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	56	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1186982	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Removing the Crudwell allocation is the right thing to do because: there is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the parish is good; individual housing developments in Crudwell should be limited to small sites with a small number of houses (10 of so) which would be appropriate to the character of the village and to its local needs; the Crudwell Neighbourhood Plan is progressing extremely well (Reg14 Consultation is planned for November 2018 and Reg16 planned for early Spring), and will allocate land to meet identified needs; the Parish should determine its own future as is consistent with Wiltshire Councils and the Governments Localism agenda.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	57	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				
<b>Please give details of why you support or do not support the updates to the</b>	The re-introduction of Site 738 has highlighted an unfair assessment of the two sites (Site 321 and Site 738) using the sustainability criteria, with a bias in favour of Site 321. The Plan is therefore unsound.				

<p><b>associated evidence documents.</b></p>	<p>WHSAP Sustainability Appraisal Report Pages 254 and 255</p> <p>7.13.7 and 7.13.14 – no major adverse effects have been identified for either site.</p> <p>7.13.9 and 7.13.15 – one identical moderate adverse effect has been found for both sites (water pressure problems/ necessity for a foul flow capacity assessment).</p> <p>A further moderate adverse effect is identified for Site 738 but not for Site 321 ('overall, residents are likely to rely upon use of the private car to reach larger facilities and services'), yet this applies to both sites. However, this appears as a minor adverse effect for Site 321.</p> <p>Paragraph 7.13.15 notes that a crossing may be required for Site 738 residents to access the village safely, yet fails to take account that two village access routes from Site 321 are also unsafe due to dangerous road crossings (at the top and bottom of Court Lane).</p> <p>7.13.10 and 7.13.16 Minor adverse effects identified for both sites are identical. These include: recreational pressure on Salisbury Plain SPA / Loss of greenfield land / Air quality and greenhouse gas emissions / Flood risk / heritage considerations / Alteration of character and appearance of village / Secondary school capacity</p> <p>The only difference is that the fact that residents are likely to use their cars for reaching larger facilities and services appears in 'moderate adverse effects' for Site 738.</p> <p>Paragraphs 7.13.11 identifies that Site 321 will have a major beneficial effect by contributing to the local economy through use of local shops and services (this is because the proposal is for 35 houses rather than 22 for Site 738). Paragraph 7.13.17 identifies this as only a minor beneficial effect for Site 738 (because fewer houses means fewer people using facilities). However, local residents and the Parish Council feel that the proposed number of houses for site 321 is beyond the needs of the village and will result in traffic congestion and a high degree of out-commuting.</p> <p>Paragraph 7.3.11 identifies a moderate benefit for Site 321 in boosting the supply of housing for the village. This is seen as a minor benefit for Site 738 in Paragraph 7.3.17. However, it may be that Site 738 better meets the identified needs of the village in providing fewer homes.</p> <p>Paragraph 7.3.11 Identifies Site 321 as bringing a minor benefit by supporting the vitality of nearby employment areas. This is assessed identically for Site 738. However, the number of people residing in Site 321 is disproportionately large compared to the number of employment opportunities within the village, and would result in traffic congestion and a high degree of out-commuting.</p> <p>The reason for the eventual dismissal of Site 738 as being less suitable than Site 321: 'The overall sustainability benefits would be marginal due to a lack of certainty that comprehensive and attractive routes for pedestrians and cyclists are deliverable' is spurious, as it applies equally to both sites.</p>
<p><b>Supporting documents (Please see Objective)</b></p>	
<p><b>Does your representation relate to a previous one</b></p>	

<p><b>you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	58	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 704825	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1)(c) (July 2018 Submission version) (WHSAP/09)				

**Please give details of why you support or do not support the updates to the associated evidence documents.**

**The council has not adequately addressed the issues raised about the development of Site 321 as a result of the September 2017 consultation. Therefore the Plan is unsound. A summary of representations and the council's response can be found on pages 169/170 of the WHSAP – Consultation Statement Regulations 22 (1) (c) - Appendices M-P and also in WHSAP Sustainability Report July 2015**

**Issues 1,2 3, 4 5 and 6 and 20**– The need and justification for development within Bratton; the quanta of homes to be developed /proposed density; the site area of the allocation; the suitability of the site compared to alternative sites/brownfield sites; the potential for alternatives to be sought through a Neighbourhood Plan; concern over lack of local employment opportunities.

**Council's response** – 'The Plan has been developed in accordance with the WCS, and its approach to allocating at large villages is in conformity with the WCS's plan led approach to delivery of housing' (WHSAP – Consultation Statement Regulations 22 (1) (c) page 170)

'In order to provide surety of housing land supply in the North and West HMA land is required to be allocated at some large villages. The Westbury Community Area remainder was considered an area of search as there is an indicative residual requirement for the area, and the most suitable site has been identified as the allocation site' housing' (WHSAP – Consultation Statement Regulations 22 (1) (c) page 170)

'There is not a well-progressed Neighbourhood Plan in the village and the Council is unable to rely on a Neighbourhood Plan to deliver allocation' (WHSAP – Consultation Statement Regulations 22 (1) (c) page 170) and 'It is too early to say whether the Parish Council will bring forward allocations of land for housing to meet their identified needs' (WHSAP – Sustainability Report July 2015 page 63)

'The density of the site at 40 dwellings is considered to be reasonable given the constraints of the site. However, the promoters of the site have carried out further detailed assessment and potential layouts which show that 35 dwellings may be more readily accommodated (Sept 2018 amendment). (WHSAP – Consultation Statement Regulations 22 (1) (c) page 170)

**My Comments:** The Plan contravenes the WCS as it seeks to fulfil the quota for the Westbury Area Remainder rather than the needs of the village. (See WCS Paragraph 4.15 – fewer than 10 dwellings to be supported within a Large village) and page 11 of EXAM 02A (Housing should be in close proximity to employment sites). See also Paragraph 3.18 page 16 of 'Wiltshire 2026 – Planning for Wiltshire's Future' – Policy C settlements – Small towns and Villages (Third Tier) - 'Settlements in the third tier are described in RSS Policy C as Small Towns and Villages. Development at these settlements will only be appropriate where it supports their self-containment together with the rural communities they serve'.

The reduction in the proposed number of houses from 40 to 35 is still totally unacceptable and in contravention of the statements contained within the WCS.

Site 321 is not the most suitable site as there are problems with safe access into the village for pedestrians and cyclists, employment opportunities, destruction of landscape character, density of housing, parking and access, over-capacity of local doctor's surgery, impact on views from the White Horse chalk escarpment and impact on biodiversity in a sensitive area (there were over 200 representations to this effect from the local community).

The Parish Council has put forward an alternative site within the village that would address the needs of the village and is currently working on its Neighbourhood Plan. This does not to be fully developed at this stage as sufficient land has been identified to meet the village's requirements. It is blatantly incorrect to state that 'It is too early to say whether the Parish Council will bring forward allocations of land for housing to meet their

identified needs' (WHSAP – Sustainability Report July 2015 page 63). WHSAP Topic Paper 2 (June 2107) states on page 17 (paragraph 4.16): 'It is a priority of the Council for local communities to take direct control of their settlements, as it is national policy' and (Paragraph 4.17 – 'Preparing a Neighbourhood Plan addresses the housing needs of a settlement in accordance with Core Policy 1 of the WCS. It is unnecessary for the Plan to supplement local consideration.'

The development of Site 321 is outside the needs of the village. The village should not be made a scapegoat to help meet government targets.

**Issue 7 – Inaccuracies in the data used in the assessment**

**Council's response** – None. The inaccuracies highlighted in the representations (the number of houses in the village and the percentage proportion of the proposed new dwellings) have not been corrected in subsequent documents. In fact they are reiterated. Page 31 of the Wiltshire Council Topic Paper 3 – May 2018- states that: 'Over the WCS Plan to date, Bratton has received very little additional growth...The addition of approximately 40 dwellings would represent modest growth'.

Here is the wording from one of my September 2017 representations, which still applies to the amended Plan:

Appendix E incorrectly states that Bratton has 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Table E1 in Appendix 1 highlights that the village has experienced growth of 26 houses, or 3.2%, in the last 10 years. This figure should actually be 5.1%.

The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. This is a significant growth for a village of Bratton's size, increasing strain on services such as the B3098, existing water pressure issues and the local GP surgery.

The statement on page 56 of the WHSAP ('..the addition of 40 houses would represent modest growth') is misleading and incorrect.

**Issues 8, 13 and 14** – Impacts on biodiversity (including Salisbury Plain SPA, local SSSIs, wildlife species); Potential for harmful impacts on heritage assets (including Bratton Conservation Area, local archaeology and historic landscape); and Disagreement over potential landscape impact and ability to mitigate impacts, including from higher ground and the White Horse / Bratton Camp.

**Council's Response** – 'Evidence suggests that the site is developable from a landscape perspective, and that potential impacts on biodiversity can be mitigated within the site' (WHSAP – Consultation Statement Regulations 22 (1) (c) page 170).

**My Comment:** No amount of tree planting will lessen the impact of a densely developed housing estate on the edge of a unique village when viewed from the White Horse escarpment Ridge and Castle Road. One of the unique features of an escarpment landscape and village is the lack of trees and the wide open views, yet the mitigation plans state: 'A new visual boundary to the settlement will need to be established along the site's western edge and new woodland planting will be a substantial part of the scheme.' This shows a lack of understanding of the character of the local landscape, and a determination to change it for the worse.

**Issue 9** – The need to preserve the site for agriculture.

**Council's Response** – As Site 321 is valuable agricultural land and currently in use for grazing beef cattle, the council's response was initially to increase their assessment of the land's capacity for 30 dwellings to 40 to 'make the most efficient use of land and maximise the delivery of affordable housing'. This number has now been reduced to 35 in the new proposals.

**My Comment:** The amendment to 35 houses is still too high for the needs of the village. To decrease this number would not be efficient use of prime agricultural land, therefore Site 321 is not the most suitable site for the area.

**Issues 10 and 12** – Land stability and Effects of development on surface water flow and flooding.

**Council's Response** – 'Amend supporting text to give greater emphasis to flood and drainage requirements' (WHSAP – Consultation Statement Regulation 22) and 'Incorporate surface water attenuation measures into the design of any subsequent layout' (WHSAP – Sustainability Report July 2015).

**My comment:** This appears to be the only positive amendment (out of two amendments) proposed by the Council and is much needed due to recent flooding in Rosenheim Rise (lower end of Site 321) after heavy rainfall.

**Issues 11 and 15** – Impacts on air quality/noise pollution; concern about impacts on amenity of adjoining residents.

**Council's response** – 'Evidence suggests that air and noise pollution arising would not be a barrier to development of the site, and that access is achievable from Westbury Road'. (WHSAP – Consultation Statement Regulations 22 (1) (c) page 170)

'Potential impacts on amenity of existing residents cannot be determined at this stage'. (WHSAP – Consultation Statement Regulations 22 (1) (c) page 170)

**My Comment:** It is inconceivable that building 35 houses will not give rise to air and noise pollution. My house is adjacent to Site 321 and I will not be looking forward to sitting out in my garden during the summer months should the development go ahead. I assume that the access referred to here is for service vehicles to and from the site. How will you assure that these vehicles will not use Court Lane for access?

Potential impacts on amenity of existing residents are easy to determine. There will be increased noise, traffic and light pollution for local residents and significant loss of views for others. Two windows of my house currently overlook miles of uninterrupted countryside. As any houses built will need to be in line with the current dwellings, the brick wall of a new house will replace my view. Residents of Rosenheim Rise risk losing light completely from their properties as new houses built on Site 321 will be significantly higher in elevation.

**Issue 16** – The need to preserve existing public rights of way that adjoin the site.

**Council's response** – 'The Plan requires that improved connections to adjoining rights of way BRAT24 and BRAT25 should be facilitated through any subsequent proposals' (WHSAP – Consultation Statement Regulations 22 (1) (c) page 170)

'Appropriate improvements to Public Rights of Way – BRAT25 and BRAT24 could be enabled through development of this site, thereby improving connectivity and reducing the need to access village facilities via private car journeys' (WHSAP – Sustainability Report July 2015 page 61).

**My Comment:** The existing footpaths should not be diverted to facilitate the proposed development. They are recorded on maps dating back to 1887 (and possibly earlier) and provide a potential buffer between current dwellings and proposed new buildings.

Even if improvements are made to existing footpaths (for example by providing a tarmac surface), pedestrian access into the village from Site 321 is hazardous and unsafe from both the upper and lower egress points (see my previous comments regarding the two crossing points at Court Lane and footpath travel on the footpath running from Site 321 to the junction with Court Lane).

**Issue 17 and 18** – Impact of development on capacity of local services and infrastructure (including schools, healthcare); request to include additional wording requiring education contributions

**Council's response** – 'Evidence indicates that there are sufficient local services available to support development' (WHSAP – Consultation Statement Regulation 22 page 170)

With regard to the secondary and sixth form school in Westbury, 'the development of the site could increase pressure on secondary school places' (WHSAP – Sustainability Report July 2015 page 62).

Development could help to address local infrastructure capacity issues over and above CIL ((WHSAP – Sustainability Report July 2015 page 63).

**My comment:** Many of the representations from the September 2017 consultation make reference to the over-capacity of the village Doctor's surgery. This appears to have been overlooked by the Council.

It has been acknowledged that the proposed development could put pressure on the secondary school in Westbury. The phrase 'Development could help to address local infrastructure capacity issues over and above CIL' is vague and uncommittal and places no obligations on the developer to assist financially.

**Issue 19** – Concern over highways, access and parking.

**Council's response** – 'Vehicular and pedestrian access would appear to be achievable from B3098' (WHSAP – Sustainability Report July 2015 page 61).

'An extension of the footway across the site frontage would be a desirable addition. Pedestrian access along the B3098 could be achieved, and there is an opportunity to link with the adjoining Public Rights of Way network (BRAT25 and BRAT 24) (WHSAP – Sustainability Report July 2015 page 61).

**My comment:** No mention is made of the congestion difficulties presented to the village by the potential increased volume of cars (at least 2 cars per household - 70 cars plus - if current car ownership within Bratton can be an indicator). The B3098 is a narrow road on the approach to site 321 from the Westbury direction, adjacent to Site 321 itself, and as far as the junction with Court Lane. Traffic along this section is a hazard to pedestrians and cyclists attempting to access the village from Site 321. Two coaches recently became jammed directly adjacent to site 321, causing a build-up of traffic. Cars frequently park on pavements between Site 321 and the junction with Court Lane, forcing pedestrians and



	<p>pushchair users out into the road. Wide vehicles sometimes mount the pavement to pass each other, and it is often impossible for large vehicles to turn left into Court Lane without mounting the pavement (and thus endangering pedestrians).</p> <p>If insufficient parking spaces are allocated within the site itself (including for visitors and service vehicles), drivers will attempt to park on the main road, thus presenting hazards to both other road users and pedestrians. There appear to be no assurances at this stage that sufficient spaces will be allocated.</p> <p>It is likely that a number of residents will travel to work in the Trowbridge / Bradford on Avon / Bath / Melksham direction, rather than Westbury, which means that they will be using Court Lane to exit the village. This steep, narrow and winding lane is extremely hazardous to both cars and pedestrians and is permanently reduced to single lane flow due to the amount of cars parked outside houses with no garages or driveways. The increase in traffic will be dangerous for pedestrians and cyclists making their way from Site 321 to access village amenities such as the school and shop.</p> <p>The Council have correctly observed that ‘an extension of the footway across the site frontage would be a desirable addition.’ Unfortunately, this is not achievable for the linking footpath that provides access from the Public Footpath at Site 321 into the village, which remains narrow at just 1.22m wide compared to 2-metre width near the Manor Fields development.</p>		
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	59	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitats Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		Sustainability Appraisal September 2018 - Main Report (EXAM/02A)	<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	Page 34 of Document EXAM /02A (Revised Sustainability Report Sept 2018) contains a summary of the 6 key challenges of the Wiltshire Core Strategy 2015. The proposed development of 35 houses on Site 321 contravenes several of these and is therefore unsound	
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	60	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Main Report (EXAM/02A)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p>There will be insufficient employment within the village for the number of people likely to occupy the proposed revised number of houses. The number of houses proposed is beyond the identified needs and employment opportunities of the village and is therefore unsound</p> <p>Too many houses will lead to a high number of people out-commuting, thus contravening Sustainability Objective no. 4 ('improve air quality and minimise all sources of environmental pollution') no. 5 ('minimise our impacts on climate change through reducing greenhouse gas emission'),</p>				

<b>Assessment Addendum (September 2018).</b>	<p>no. 9 ('promote inclusive and self-contained communities') and no. 10 ('reduce the need to travel and promote more sustainable transport choices').</p> <p>Page 11 of Document EXAM / 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.'</p> <p>Page 11 of Document EXAM / 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport.'</p>		
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	61	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>					Sustainability Appraisal September 2018 - Main Report (EXAM/02A)
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>					The proposed reduction in the number of houses from 40 to 35 is unsound as it is still too large a development for the size of the village. In the Wiltshire and Swindon Structure Plan 2016, paragraph DP3 (page 31) states (in capital letters):  LOCAL DEVELOPMENT DOCUMENTS SHOULD...  IDENTIFY SMALL TOWNS AND VILLAGES TO MEET LOCAL NEEDS ONLY

<b>Assessment Addendum (September 2018).</b>	<p>DEVELOPMENT SHOULD BE LIMITED IN SCALE AND WELL INTEGRATED WITH THE EXISTING FORM OF THE SETTLEMENT.</p> <p>EXAM/02A Appendix B states: 'Inappropriate development in a Green Belt should not be approved except in very exceptional circumstances and new buildings in the Green Belt will not generally be approved.'</p> <p>i) The number proposed is beyond the needs of the village (which identified the need for 8 houses only) and serves only to fulfil the needs of the Westbury Remainder quota</p> <p>ii) It shows a complete disregard for the representations made by Bratton residents and Parish Council during the consultation period of September 2017.</p> <p>iii) The Parish Council has infill land that can meet the needs of the village and beyond. It is also actively seeking new alternatives.</p> <p>iv) The Parish Council rejected the plans for Site 321 in September 2017 yet this is not reflected in the most recent Westbury Area Topic Paper.</p> <p>v) The Parish Council is currently working on a Neighbourhood Plan for the village yet this has been dismissed in the Sustainability Appraisal report (p.63) as 'being in the early stages'. Document EXAM /02A p.86 states: 'Emerging Neighbourhood Plans should be considered when planning new developments in Wiltshire towns and villages.'</p> <p>vi) The building of 35 houses exceeds the number recommended for Large Villages within the Wiltshire Core Strategy. Paragraph 4.15 states: 'At the settlements identified as villages, a limited level of development will be supported...At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries.' Small housing sites are identified as 'sites involving fewer than 10 dwellings.'</p> <p>vii) The density of the proposed dwellings would necessitate multi-storey buildings (especially if space is to be made for green/amenity sites and sufficient parking places within the development). This would be out of character with the predominant housing style of the village.</p> <p>viii) Any multi-storey buildings would impact critically on the long-range views across open countryside currently enjoyed by many residents of the village.</p> <p>ix) A large estate development at the gateway to the village would be completely out of character and change the nature of the village. A high-density development does not suit a village with a largely low-density housing stock.</p>		
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one</b>			

<p><b>you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	62	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Main Report (EXAM/02A)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	The existing infrastructure of the village does not provide safe access into the village for cyclists and pedestrians travelling from Site 321, thus contravening the Transport element of the Sustainability Appraisal Objectives (page 345 of WHSAP: Sustainability Appraisal Report –‘Policies should enable the provision of effective walking and cycling connections’ and EXAM /02a page 89 – ‘Locate new development where it is accessible to all on foot, by bicycle or through using public transport’ and ‘Ensure new development incorporates appropriate facilities and infrastructure for cyclists’.). In the Wiltshire and Swindon Structure Plan 2016, paragraph DP2 (page 30) states (in capital letters):				

**Assessment Addendum  
(September 2018).**

DEVELOPMENT SHOULD NOT PROCEED UNLESS THE INFRASTRUCTURE, SERVICES AND AMENITIES MADE NECESSARY BY THE DEVELOPMENT CAN BE PROVIDED AT THE APPROPRIATE TIME.

Document EXAM /02A (page 70 – Sustainability Themes) Paragraph 3.2.1 states: ‘Ensure that development is supported by the necessary infrastructure’.

Pedestrian access into the village via the B3098

i) Both the road and footpath are narrow between Site 321 and the junction at the top of Court Lane. The footpath is 1.2 metres wide at its widest point (compared to 2 metres width at Manor Fields). This represents a traffic hazard if young families make their way to and from the local school or other amenities, especially if children are tempted to overtake other pedestrians or pushchairs, as they will be forced to walk into the road). Traffic passes very close to pedestrians, as the road is narrow. When buses or lorries pass each other, they sometimes mount the pavement. When cars park on the main road, they park on the pavement, as to park on the road would be hazardous to overtaking traffic due to poor line of sight. This forces pedestrians (especially those with pushchairs) into the road. As I walked my children along this path to school for several years, I am only too aware of how dangerous it is. The Bratton Village Appraisal report of 1999 (page 11) records a number of requests for improvement to the pavement along this stretch of road. I recently witnessed two buses trying to pass each other on the road directly adjacent to Site 321. The road was blocked for about an hour, with subsequent build-up of traffic, as the two buses tried to extricate themselves. This road is too narrow for safe passage of cyclists and pedestrians from Site 321.

ii) The wide junction at the top of Court Lane where it meets with the B3098 has also been identified in the Bratton Village Appraisal report as a dangerous crossing place for pedestrians, yet this forms part of the route for pedestrians into the village from Site 321 (this would be exacerbated with the increased traffic flow from the proposed new development). The junction is a crossroads, with cars coming at speed from several directions, often unseen until the last minute. Large vehicles turning left from the B3098 into Court Lane often mount the pavement, putting waiting pedestrians at risk (the road sign on the corner of this road has been damaged several times).

iii) To access the village via the footpath link adjacent to Rosenheim Rise to the lower end of Court Lane also involves a dangerous road crossing (across Court lane and into Bury Lane), yet this forms part of the route for pedestrians into the village from Site 321 (this would be exacerbated with the increased traffic flow into Court Lane from the proposed new development). Traffic comes at speed down the steep hill of Court Lane, with little visibility for pedestrians and no pavement to act as a buffer. I used this crossing when my children were small and I was a resident of Rosenheim Rise. It was not an easy task to prevent a young child running out blindly onto this road. An increasing number of cars parked along this road have reduced the visibility even further for pedestrians. In the Bratton Village Appraisal report of 1999, it was suggested that a barrier could be erected at this footpath /road junction. However, a barrier would also prevent easy access for pushchairs /wheelchairs. Additionally, this path is very narrow and difficult for wheelchair /pushchair users. It is often choked with mud and debris during the winter months, which washes down from the steep bank on one side.

Cycling access into the village via the B3098

The narrow and busy B3098 (especially between Site 321 and the junction of Castle Road) is not a pleasant road to cycle along and would be totally unsuitable for Junior School age children and families accessing the village by bicycle. It cannot hope to form part of the Sustainability Objectives (the provision of effective walking and cycling connections) in connection with the proposed housing development on Site 321.

	<p>Cyclists returning from the village and turning right into Site 321 would be vulnerable to oncoming traffic and traffic approaching at speed from behind if positioned in the centre of the road for turning.</p> <p>EXAM/02A Appendix B (page 345) states: ‘Policies should enable the provision of effective walking and cycling connections.’</p> <p>EXAM /02A Appendix B (page 346) states: ‘Ensure that development is supported by the necessary infrastructure.’</p> <p>The danger inherent for pedestrians and cyclists accessing village facilities from Site 321 contravenes Strategy DPD SA Objective 11 (EXAM/02A page 93) – ‘Provide a safe and healthy environment in which to live.’ This is particularly pertinent should some of the housing stock be provided for young families with children or the elderly (see page 260 of EXAM/02A Paragraph 8.36 – ‘The policy could be strengthened by requiring that some of the new housing meets the specific needs of vulnerable and older people.’)</p>		
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	63	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				
<b>Please give details of why you support or do not support the updates to the</b>	The reason for the dismissal of Site 738 (Land south of Westbury Road) applies equally to Site 321 (Court Orchard /Cassways). The decision to reject one site but keep the other is not sound.				

<p><b>associated evidence documents.</b></p>	<p>The reason for the dismissal of Site 738 (Land south of Westbury Road): ‘The overall sustainability benefits would be marginal due to a lack of certainty that comprehensive and attractive routes for pedestrians and cyclists are deliverable’ applies equally to Site 321. The reasons this is the case for BOTH sites are as follows.</p> <p>The WHSAP states: ‘The B3098 Westbury Road does not appear to be a particularly busy road and the landscape at the western edge has an exposed and remote feel. Overall the site and immediate landscape context is peaceful.’</p> <p>The B3098 is a busy road and this description of it is inaccurate. Increased traffic now flows into Bratton as the village is used as an alternative route to the Yarnbrook roundabout, which is often heavily congested. Residents living along the B3098 often have to wait some considerable time before pulling out of their driveways to exit their properties at peak times, and doing so is often a risky and dangerous manoeuvre due to lack of visibility along this stretch of road, with no pavement to act as a ‘buffer’. The additional traffic associated with the building of 35 new homes (potentially at least 70 more cars) would add considerably to the congestion and would have a major adverse impact on road safety. The stretch of road between Bratton and Westbury has a higher than average number of crashes than most areas of the country.</p> <p>For cyclists: Whether turning right out of Site 738 to access the village or right into Site 321 upon returning from the village, a busy and dangerous road has to be negotiated. This narrow stretch of road is unsuitable for children of Junior School age to cycle to the village school.</p> <p>For walkers: A disadvantage of Site 738 is that a busy road (the B3098) must be crossed to reach a footpath. But for residents of housing on Site 321 accessing the village via the footpath link from Rosenheim Rise to Court Lane, an equally dangerous crossing must be made (across Court Lane to Bury Lane). There is limited visibility for traffic emerging at speed down a steep hill and no footpath to act as a barrier. The crossing at the top junction of Court lane on the B3098 (which is a crossroads) is equally hazardous, yet this forms an access route into the village from both sites 738 and 321.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	64	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				
<b>Please give details of why you support or do not support the updates to the</b>	Dismissal of Site 738 without fair public consultation is unsound.				

<p><b>associated evidence documents.</b></p>	<p>Subsequent to the consultation process in September 2017 on Site 321 (Court Orchard / Cassways), a further site (Site 738 – Land south of Westbury Road –dismissed at an earlier stage in the assessment process) was reinstated as a viable alternative (EXAM /02A page 16). Local interested residents, the Parish Council and local councilor Jerry Wickam were not made aware of the reinstatement and the site was dismissed by the selection process without due public consideration. Site 738 should be reinstated as a consideration. The sustainability assessment scores for the two sites were remarkably similar (as the sites are opposite each other), yet 738 seems to have been engineered out (The criteria for dismissal – ‘The overall sustainability benefits would be marginal due to a lack of certainty that comprehensive and attractive routes for pedestrians and cyclists are deliverable’ – applies equally to both sites). Site 738 received no major adverse scores on the sustainability assessment and should not have been eliminated.</p> <p>In the WHSAP Sustainability Report (July 2015), page 67, Table G5 states: ‘Taking account of likely mitigation measures, the combined pool of both site options in this area would deliver substantially more than the indicative 47 dwellings required over the remainder of the plan period and would not represent the modest growth envisaged by the WSC in Core Policy 1. It is therefore necessary to reject one site option at this stage of the assessment process in order to ensure the timely delivery of sustainable growth.’</p> <p>In fact, Site 738 more readily meets the needs of the village as identified by a village housing needs survey. The September 2017 consultation process has highlighted the village’s concern about the proposed number of houses to be built on Site 321. Site 738 would be less obtrusive as an edge-of-village development than a large development on Site 321, and would be screened to a greater degree by other buildings already in existence.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	65	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187002	Senior Planner Pro Vision  <b>Person ID:</b> 1187003	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC46				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Feltham, in conjunction with the Reynolds Family (landowners), are promoting The Spring site in Market Lavington for residential development. Feltham support Proposed Changes 46-48 to the draft Wiltshire Housing Site Allocations Plan, to delete all sites at Market Lavington, and to defer the consideration of housing allocations to the emerging neighbourhood plan. These changes remove the previous conflict between the Market Lavington Neighbourhood Plan and the draft Wiltshire Housing Site Allocations Plan.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	66	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187002	Senior Planner Pro Vision  <b>Person ID:</b> 1187003	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC47				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Feltham, in conjunction with the Reynolds Family (landowners), are promoting The Spring site in Market Lavington for residential development. Feltham support Proposed Changes 46-48 to the draft Wiltshire Housing Site Allocations Plan, to delete all sites at Market Lavington, and to defer the consideration of housing allocations to the emerging neighbourhood plan. These changes remove the previous conflict between the Market Lavington Neighbourhood Plan and the draft Wiltshire Housing Site Allocations Plan.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	67	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187002	Senior Planner Pro Vision  <b>Person ID:</b> 1187003	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC48				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Feltham, in conjunction with the Reynolds Family (landowners), are promoting The Spring site in Market Lavington for residential development. Feltham support Proposed Changes 46-48 to the draft Wiltshire Housing Site Allocations Plan, to delete all sites at Market Lavington, and to defer the consideration of housing allocations to the emerging neighbourhood plan. These changes remove the previous conflict between the Market Lavington Neighbourhood Plan and the draft Wiltshire Housing Site Allocations Plan.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	68	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 402574	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC13				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 13 Table 4.5 PC 51 Policy H2 Table 5.3 PC 60 - Policy H2, Table 5.3; Paragraph 5.52 PC 64 para 5.58 Comment No justification is given for increasing the number of housing units on these sites. Are the numbers just being plucked out of the air? Surely these figures to be backed up by careful research? Whereas high density may be acceptable and expected in the centre of a town, surely lower densities should be employed with most developments in rural areas? A factor which I do not believe is readily understood is that, with higher densities, there is less space for gardens and less space in those gardens for wildlife sustainability; and fences prevent hedgehogs, for example, penetrating into these areas. Neither is there space for reasonably sized trees to provide nesting spaces for birds. Also, large numbers of houses on one site are not appropriate for rural areas unless one is designing a new settlement. Established villages need to absorb expansion in small bites, so as not to upset the general life of the village. Considerations such as this do not seem to feature in WHSAP, presumably because of the need to provide numbers.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	69	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>		PC51			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 13 Table 4.5 PC 51 Policy H2 Table 5.3 PC 60 - Policy H2, Table 5.3; Paragraph 5.52 PC 64 para 5.58 Comment No justification is given for increasing the number of housing units on these sites. Are the numbers just being plucked out of the air? Surely these figures to be backed up by careful research? Whereas high density may be acceptable and expected in the centre of a town, surely lower densities should be employed with most developments in rural areas? A factor which I do not believe is readily understood is that, with higher densities, there is less space for gardens and less space in those gardens for wildlife sustainability; and fences prevent hedgehogs, for example, penetrating into these areas. Neither is there space for reasonably sized trees to provide nesting spaces for birds. Also, large numbers of houses on one site are not appropriate for rural areas unless one is designing a new settlement. Established villages need to absorb expansion in small bites, so as not to upset the general life of the village. Considerations such as this do not seem to feature in WHSAP, presumably because of the need to provide numbers.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	70	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC60				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 13 Table 4.5 PC 51 Policy H2 Table 5.3 PC 60 - Policy H2, Table 5.3; Paragraph 5.52 PC 64 para 5.58 Comment No justification is given for increasing the number of housing units on these sites. Are the numbers just being plucked out of the air? Surely these figures to be backed up by careful research? Whereas high density may be acceptable and expected in the centre of a town, surely lower densities should be employed with most developments in rural areas? A factor which I do not believe is readily understood is that, with higher densities, there is less space for gardens and less space in those gardens for wildlife sustainability; and fences prevent hedgehogs, for example, penetrating into these areas. Neither is there space for reasonably sized trees to provide nesting spaces for birds. Also, large numbers of houses on one site are not appropriate for rural areas unless one is designing a new settlement. Established villages need to absorb expansion in small bites, so as not to upset the general life of the village. Considerations such as this do not seem to feature in WHSAP, presumably because of the need to provide numbers.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	71	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC64				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 13 Table 4.5 PC 51 Policy H2 Table 5.3 PC 60 - Policy H2, Table 5.3; Paragraph 5.52 PC 64 para 5.58 Comment No justification is given for increasing the number of housing units on these sites. Are the numbers just being plucked out of the air? Surely these figures to be backed up by careful research? Whereas high density may be acceptable and expected in the centre of a town, surely lower densities should be employed with most developments in rural areas? A factor which I do not believe is readily understood is that, with higher densities, there is less space for gardens and less space in those gardens for wildlife sustainability; and fences prevent hedgehogs, for example, penetrating into these areas. Neither is there space for reasonably sized trees to provide nesting spaces for birds. Also, large numbers of houses on one site are not appropriate for rural areas unless one is designing a new settlement. Established villages need to absorb expansion in small bites, so as not to upset the general life of the village. Considerations such as this do not seem to feature in WHSAP, presumably because of the need to provide numbers.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	72	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 402574	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC26				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 26 Para 4.53 Comment - There are modern building techniques which shorten the build time for housing. The Ashton park developers should be encouraged to use these. Also, when detailed planning applications are received by the Authority, every effort should be made to expedite them. Generally too much time appears to be lost in planning negotiations.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	73	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 402574	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC61				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 61 New para after para 5.56 Comment - This is indicative of insufficient care in allocating this area for housing in the first place.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	74	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 402574	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC68				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 68 - Replace 5.68 with new text: Comment As a critical observer I must highlight the contrast, where in one part of the document the housing density is increased on this site, whilst in another section the need is for greater care to be given to the heritage needs around Church Lane is stressed.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	75	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 402574	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC69				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 69 Para 5.67 PC 71 Para 5.73 PC 73 Para 5.79 Comment It is clear to me from these three items that Joined-up Planning would look at the Lambrok stream sections in one. The stream is a resource in many ways and imaginative planning would have produced a design brief to look at the flood risk and ecology opportunities over the whole length across these three sites, H2.4, 5 and 6. These three sites should be removed from HSAP, to be comprehensively considered, hopefully in consultation with the Friends of Southwick Country Park who are willing to lend their expertise and experience to achieve a satisfactory outcome.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	76	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 402574	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC71				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 69 Para 5.67 PC 71 Para 5.73 PC 73 Para5.79 Comment It is clear to me from these three items that Joined-up Planning would look at the Lambrok stream sections in one. The stream is a resource in many ways and imaginative planning would have produced a design brief to look at the flood risk and ecology opportunities over the whole length across these three sites, H2.4, 5 and 6. These three sites should be removed from HSAP, to be comprehensively considered, hopefully in consultation with the Friends of Southwick Country Park who are willing to lend their expertise and experience to achieve a satisfactory outcome.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	77	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 402574	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC73				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 69 Para 5.67 PC 71 Para 5.73 PC 73 Para5.79 Comment It is clear to me from these three items that Joined-up Planning would look at the Lambrok stream sections in one. The stream is a resource in many ways and imaginative planning would have produced a design brief to look at the flood risk and ecology opportunities over the whole length across these three sites, H2.4, 5 and 6. These three sites should be removed from HSAP, to be comprehensively considered, hopefully in consultation with the Friends of Southwick Country Park who are willing to lend their expertise and experience to achieve a satisfactory outcome.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	78	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 402574	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC70				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 70 Para 5.73 Comment The only justification to increase the number of houses on site H 2.5 from 20 to 45 is to maximise efficient use of land and in response to consultation . Either the original appraisal work done on this site was not fit for purpose, in which case all the other sites in HSAP need querying, or the current increase is one of expediency rather than careful consideration which this site merits. There should be a demonstration of the effect that the increase in housing units will have on all the aspects of the site, rather than just counting houses. The Council may have to provide sufficient housing for its residents but this does not justify a slapdash approach to planning. We need to leave a legacy that our children and grandchildren will be happy to call home. I find it odd that numbers have been increased in response to comments. If all the comments received on this site were considered a case could be made not to have any development on this site.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	79	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 402574	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC72				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 72 Para 5.78 Comment - The extensive revision to this text is indicative of the poor research that has gone into this HSAP in many areas. The research is still not complete. We are awaiting the bat mitigation strategy which could affect this site H2.6 as well as the heritage considerations. Sites around Trowbridge which could be affected by the mitigation requirements should be withdrawn from this HSAP for a further more detailed study when the mitigation strategy is available.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	80	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 402574	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC74				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC 74 New Paragraph under 5.87 Highways England has raised that there may be cumulative impacts on the A36 arising from proposed housing allocations at Warminster and this requires consideration. Comment The only similar comment from the Highways section of Wiltshire Council that I have noticed relates to Salisbury - Transport: development inevitably has impacts on the local transport network. Does this mean that that section was not consulted on other areas or are they not concerned about traffic conditions in Trowbridge, for example? Congestion is already present in central Trowbridge and new housing can only exacerbate the problem. Surely development in and around Trowbridge needs to be delayed until serious consideration is given to capacity improvement, or is it time to identify sites for Park and Ride parking and control of private parking? It is rather side-stepping responsibility to suggest that development in Warminster on sites that Wiltshire Council planners have identified should consider the effect of each separate development on congestion. It is the cumulative effect of WHSAP that Highways England is concerned about. The appropriate Transportation Plan should cover this point or is it too embarrassing to admit that congestion will get worse and Wiltshire Council can do nothing about it? It rather puts a hole in the sustainability justification.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		



<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	81	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 402574	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Main Report (EXAM/02A)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<b>Response to</b> <b>“Wiltshire Council: Wiltshire Housing Site Allocations Plan: Sustainability Appraisal Report”</b> <b>Policy H2</b>				

<p><b>Assessment Addendum (September 2018).</b></p>	<p>Having been a traffic engineer for 40 years I find it somewhat disturbing that this policy discussion states:-</p> <p>“Minor negative effects are identified in relation to air quality and the policy identifies general mitigation to this effect, though some of the wording could be strengthened. Ultimately, though the allocation of a number of sites will result in an increase in the number of private car journeys (SA Obj. 4).”</p> <p>This omits to mention that there will be some locations where there will be serious reductions in air quality due to increases in congestion. Congestion does not increase linearly with traffic increase. It is far more complicated than that. When congestion is already present then any increase in traffic results in extended queues and extended periods of queuing. Living in North Bradley as I do, I have direct experience of the conditions in Bradley Road Trowbridge at various times of the day. Whilst the A350 West Ashton Relief Road will help at Yarnbrook, the extra homes suggested for the south side of Trowbridge will exacerbate the situation and walking along Bradley Road will not be good for my health or the runners who seem to use it as part of a circuit.</p> <p>Southwick Road in North Bradley is due to receive a very large increase in traffic due to the Ashton Park development. It is already unpleasant to walk along the road at peak periods. This will be extended over the working day. Building the Ashton park development will bring a lot of aggregate trucks through North Bradley bringing more diesel fumes.</p> <p>These are not minor problems. Research is showing that traffic fumes have more serious adverse effects on health than previously thought. We should not be building houses fronting on to trafficked roads. These problem areas need to be acknowledged. When they are, then there is more chance of some remedial action. Brushing them under the carpet is not helpful or professional.</p>		
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	82	<b>Consultee</b> Clerk Market Lavington Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 924012		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC46				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Proposed change reference numbers PC46, PC47, PC48 and other related changes: Market Lavington Parish Council welcomes and supports the resolution made by Wiltshire Councils Cabinet to delete all the proposed sites at Market Lavington from the WHSAP, and crediting the change to the significant progress made on the preparation of the Market Lavington Neighbourhood Plan. The proposed sites being put forward in the Neighbourhood Plan will not only deliver more homes than proposed in the WHSAP, but will also be supported and approved by the community.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	83	<b>Consultee</b> Clerk Market Lavington Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 924012		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC47				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Proposed change reference numbers PC46, PC47, PC48 and other related changes: Market Lavington Parish Council welcomes and supports the resolution made by Wiltshire Councils Cabinet to delete all the proposed sites at Market Lavington from the WHSAP, and crediting the change to the significant progress made on the preparation of the Market Lavington Neighbourhood Plan. The proposed sites being put forward in the Neighbourhood Plan will not only deliver more homes than proposed in the WHSAP, but will also be supported and approved by the community.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Comment ID:</b>	84	<b>Consultee</b> Clerk Market Lavington Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 924012		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC48				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Proposed change reference numbers PC46, PC47, PC48 and other related changes: Market Lavington Parish Council welcomes and supports the resolution made by Wiltshire Councils Cabinet to delete all the proposed sites at Market Lavington from the WHSAP, and crediting the change to the significant progress made on the preparation of the Market Lavington Neighbourhood Plan. The proposed sites being put forward in the Neighbourhood Plan will not only deliver more homes than proposed in the WHSAP, but will also be supported and approved by the community.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	85	<b>Consultee</b> Clerk Market Lavington Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 924012		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC1				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Market Lavington Parish Council considers the methodology used by Wiltshire Council to assess representations made to the settlement boundary review to be sound and fair, and supports the further amendments from the pre-submission versions proposed for Market Lavington.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	86	<b>Consultee</b> Planning and Local Government Natural England	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 382216		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Update to Habitats Regulations Assessment Addendum (September 2018) (EXAM/03)		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	Dear Sir/Madam, many thanks for the consultation below. We have reviewed the proposed changes to the Wiltshire Housing Site Allocations Plan. None of the changes proposed lead us to advise the plan is unsound. However, we await the Habitats Regulation Assessment for this Plan, and until such time as we are satisfied that the Plan will not have an adverse effect on the integrity of any relevant designated sites, we cannot advise that the Plan is sound in HRA terms.	

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	87	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 895665	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [H2.3]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I'm not in favour of the Council's housing plan. I would like to register my objection to the decision as when planning permission was given for Elizabeth Way it was on the basis that it would be a relief road for Hilperton and that no houses were going to be built along the road. Also building houses would mean exits onto Elizabeth Way which means that it won't be a relief road anymore. It would be appreciated if you would register my objection to the relevant parties please including the planning inspector.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Comment ID:</b>	88	<b>Consultee</b> Coulston Estates	<b>Agent</b> Director Planning Sphere	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 901939	<b>Person ID:</b> 901806	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC54				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Land ownership: Following the acquisition of a strip of land to the north of Southview Farm from Wain Homes, the extent of the overall proposed allocation site area has now increased from 17.78ha to 17.85ha (refer to Location Plan Ref: 1178.E.001 Rev D as shown at Appendix A).  Proposed allocation: the proposed allocation of Elm Grove under Policy H2.1 is supported in principle. This follows a collaborative approach that has been undertaken between the site owners and Wiltshire Council following the initial promotion of the site in 2015. Pre-application enquiry: an updated masterplan has been formulated which demonstrates that the proposed allocation site can deliver c.254 homes and a 2FE primary school and associated infrastructure (refer to Masterplan Ref: 1178.P.001 Rev G as shown at Appendix B and proposed Accommodation Schedule at Appendix C). This masterplan will be the subject of a further pre-application submission that will be submitted to the Councils Development Management team in November 2018. Deliverability: Subject to the grant of outline planning permission in 2019, and subsequent approval of reserved matters, the infrastructure and housing (including affordable housing) elements of the proposed allocation will be capable of being fully delivered by the end of 2023. Wiltshire Council take on the responsibility of deliver the new primary school. Statement of Common Ground: Coulston Estates are committed to continue to work proactively with the Council to ensure the delivery of this site, and are willing to participate in the preparaton of a Statement of Common Ground in advance of the forthcoming Examination.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>	5120783		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	89	<b>Consultee</b> Coulston Estates	<b>Agent</b> Director Planning Sphere	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 901939	<b>Person ID:</b> 901806	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC55				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Land ownership: Following the acquisition of a strip of land to the north of Southview Farm from Wain Homes, the extent of the overall proposed allocation site area has now increased from 17.78ha to 17.85ha (refer to Location Plan Ref: 1178.E.001 Rev D as shown at Appendix A).</p> <p>Proposed allocation: the proposed allocation of Elm Grove under Policy H2.1 is supported in principle. This follows a collaborative approach that has been undertaken between the site owners and Wiltshire Council following the initial promotion of the site in 2015. Pre-application enquiry: an updated masterplan has been formulated which demonstrates that the proposed allocation site can deliver c.254 homes and a 2FE primary school and associated infrastructure (refer to Masterplan Ref: 1178.P.001 Rev G as shown at Appendix B and proposed Accommodation Schedule at Appendix C). This masterplan will be the subject of a further pre-application submission that will be submitted to the Councils Development Management team in November 2018. Deliverability: Subject to the grant of outline planning permission in 2019, and subsequent approval of reserved matters, the infrastructure and housing (including affordable housing) elements of the proposed allocation will be capable of being fully delivered by the end of 2023. Wiltshire Council take on the responsibility of deliver the new primary school. Statement of Common Ground: Coulston Estates are committed to continue to work proactively with the Council to ensure the delivery of this site, and are willing to participate in the preparaton of a Statement of Common Ground in advance of the forthcoming Examination.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>	5120783		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	90	<b>Consultee</b> Coulston Estates	<b>Agent</b> Director Planning Sphere	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 901939	<b>Person ID:</b> 901806	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC56				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Land ownership: Following the acquisition of a strip of land to the north of Southview Farm from Wain Homes, the extent of the overall proposed allocation site area has now increased from 17.78ha to 17.85ha (refer to Location Plan Ref: 1178.E.001 Rev D as shown at Appendix A).</p> <p>Proposed allocation: the proposed allocation of Elm Grove under Policy H2.1 is supported in principle. This follows a collaborative approach that has been undertaken between the site owners and Wiltshire Council following the initial promotion of the site in 2015. Pre-application enquiry: an updated masterplan has been formulated which demonstrates that the proposed allocation site can deliver c.254 homes and a 2FE primary school and associated infrastructure (refer to Masterplan Ref: 1178.P.001 Rev G as shown at Appendix B and proposed Accommodation Schedule at Appendix C). This masterplan will be the subject of a further pre-application submission that will be submitted to the Councils Development Management team in November 2018. Deliverability: Subject to the grant of outline planning permission in 2019, and subsequent approval of reserved matters, the infrastructure and housing (including affordable housing) elements of the proposed allocation will be capable of being fully delivered by the end of 2023. Wiltshire Council take on the responsibility of deliver the new primary school. Statement of Common Ground: Coulston Estates are committed to continue to work proactively with the Council to ensure the delivery of this site, and are willing to participate in the preparaton of a Statement of Common Ground in advance of the forthcoming Examination.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>	5120783		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	91	<b>Consultee</b> Coulston Estates	<b>Agent</b> Director Planning Sphere	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 901939	<b>Person ID:</b> 901806	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC57				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Land ownership: Following the acquisition of a strip of land to the north of Southview Farm from Wain Homes, the extent of the overall proposed allocation site area has now increased from 17.78ha to 17.85ha (refer to Location Plan Ref: 1178.E.001 Rev D as shown at Appendix A).</p> <p>Proposed allocation: the proposed allocation of Elm Grove under Policy H2.1 is supported in principle. This follows a collaborative approach that has been undertaken between the site owners and Wiltshire Council following the initial promotion of the site in 2015. Pre-application enquiry: an updated masterplan has been formulated which demonstrates that the proposed allocation site can deliver c.254 homes and a 2FE primary school and associated infrastructure (refer to Masterplan Ref: 1178.P.001 Rev G as shown at Appendix B and proposed Accommodation Schedule at Appendix C). This masterplan will be the subject of a further pre-application submission that will be submitted to the Councils Development Management team in November 2018. Deliverability: Subject to the grant of outline planning permission in 2019, and subsequent approval of reserved matters, the infrastructure and housing (including affordable housing) elements of the proposed allocation will be capable of being fully delivered by the end of 2023. Wiltshire Council take on the responsibility of deliver the new primary school. Statement of Common Ground: Coulston Estates are committed to continue to work proactively with the Council to ensure the delivery of this site, and are willing to participate in the preparation of a Statement of Common Ground in advance of the forthcoming Examination.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>	5120783		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes



<b>Comment ID:</b>	92	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 901952	Director Planning Sphere  <b>Person ID:</b> 901806	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Proposed allocation: the proposed allocation of land at Court Orchard / Cassways under Policy H2 is supported in principle. This follows a collaborative approach that has been undertaken between the site owners and Wiltshire Council following the initial promotion of the site in 2015. Land ownership: the subject site is in the freehold ownership of Mr and Mrs Miller (acquired in 1975). We can confirm on behalf of the landowner that the subject site is available for residential development and that they will cooperate with the Council in respect of the site promotion in consultation with the local community. PC94: the revision to the quantum of development of approximately 35 dwellings is supported. However, area of the proposed allocation is incorrectly stated as 1.35ha. Additional land to the western boundary will be required for site drainage and landscape mitigation. The correct extent of the allocation site is 1.61 as shown on the enclosed Site Location Plan (Plan Ref: 1136.011 shown at Appendix A). Deliverability: Subject to the grant of outline planning permission in 2019, and subsequent approval of reserved matters, the housing (including affordable housing) will be capable of being fully delivered by the end of 2021. Statement of Common Ground: the landowners are committed to continue to work proactively with the Council to ensure the delivery of this site, and are willing to participate in the preparaton of a Statement of Common Ground in advance of the forthcoming Examination.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>	5121710		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	93	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1106467	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [H2.4 and H2.5]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Regarding Site 3260 Upper Studley and site 1021 Church Lane, there appears to be no response to concerns raised during the initial consultation process in September 2017 regarding protection of ancient hedgerows in accordance with the Ancient Hedgerow Act 1997. Evidence was submitted to the Council (Ancient Hedgerow, Hedgerow map 1838 and Hedgerow Map 1886) which proved that all the existing hedge lines at the sites would qualify as ancient hedgerow. The evidence seems to have been completely ignored by the council. The ancient hedgerow within Sites 3260 and 1021 would not allow access to the large portion of these sites, or indeed through to site 3565. On these grounds alone, development should not be permitted. WHSAP Consultation Statement Regulation 22 M P: in Stage 2, the omission sites for Trowbridge were discounted on the bases that they were inside the settlement boundary. Neighbours have informed me that they were told by Wiltshire planning on moving to properties adjacent to sites 3260 and 1021 that development of these sites would not be possible as they were outside the settlement boundary. There cannot be a valid reason for excluding the following sites: Bowyers, Hospital, Margaret Stancombe School, East Wing and Ashton Street, when Wiltshire Council states that it is committed to providing affordable housing with good transport links alongside urban regeneration for a growing population. In addition, the full extent of the Heritage, Archeological, Recreational, Agricultural and Environmental Importance of Upper Studley and Church Lane was not considered at Stage 2 as this was only raised by residents and other agencies in September 2017. The Council should therefore remove Upper Studley and Church Lane sites from the HSAP until it can prove that development of these omission sites (above) would have a greater impact on these criterion (which clearly it cannot</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	94	<b>Consultee</b> Chair Bratton Neighbourhood Plan Steering Group	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187065		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				
<b>Please give details of why you support or do not support the updates to the</b>	Wiltshire Housing Site Allocations Plan - Focussed consultation on the Schedule of Proposed Changes and associated evidence documents Introduction				

**associated evidence documents.**

1. I have been appointed as the Chair of the Steering Group(SG). In the introductory meeting with the Council's Liaison Officer it became apparent that our work could be undermined by the consultation (then closed) on the above Plan.
2. The Schedule of Proposed Changes has given the SG the opportunity of communicating our initial views to you and the Inspector.
3. The SG recognises that Bratton Parish has come, rather late in the day, to develop a Neighbourhood Plan. Previous Councils, I have been informed have resisted embarking on a Plan for financial reasons and also because it was felt that Core Policy 1 (Settlement Strategy) of Wiltshire Council's Core Strategy (of which more later) protected the Village from large scale development proposals. This was probably somewhat naïve given the information in the Strategy relating to the housing allocation requirement for the Westbury Community Area Remainder.
4. The Council elected in 2017 had different ideas and it immediately started to discuss formally and informally within the Village the energy for developing a Neighbourhood Plan. A series of public meetings was held and the SG established. Progress was delayed for many months because of the failure of Wiltshire Council to appoint a Liaison Officer.
5. At the public meetings and a subsequent questionnaire sent to every home in the Village the issue of further house building in the Village was identified as a key issue. Most respondents recognise that adequate provision must be made to meet local housing needs and one of our first requests to Wiltshire Council was to carry out a Housing Needs Survey, the results of which are still awaited.
6. The Schedule of Changes pays great respect to those communities that have achieved Neighbourhood Plans but rather brushes aside the significance of Bratton's because we are at an early stage in the process.
7. I note from your website that the Inspector's task is to consider the soundness of the submitted Plan, based on the criteria set out in paragraph 182 of the 2012 National Planning Policy Framework (the Framework). I will use those headings to communicate the views of the Steering Group on the Plan.
8. Positively prepared. The provisions of the Plan to which the SG wishes to object to is the identification of two sites 321 for 40 houses (or sometimes 35) and a rejected site 738 for 22 houses. This is to meet a perceived need for 115 houses in the Westbury Area Remainder identified at para 4.26 of the Core Strategy. The March update of the housing numbers is as follows:  
  
Area Westbury Community Area Remainder:  
  
Indicative requirement 2006 - 2026 – 115  
  
Completions 2006 - 2017 – 60  
  
Developable commitments 2017 - 2026 - 51  
  
Indicative remaining requirement - 4

9. Enquiries have revealed that, despite the footnote to the figures stating 'Figures in the developable commitments column represent committed sites only and do not include a windfall allowance' site 321 has already been included in this 'developable commitments' column.

10. Bratton is in the fourth tier of settlement identified in the Core Strategy yet there does not appear to have been any objective assessment within the documentation to clarify why Bratton as a fourth tier settlement should be required to meet the identified shortfall.

11. The figures for the Westburty Town Area excluding the Remainder are as follows:

Area Westbury Community Area Town

Indicative requirement 2006 - 2026 – 1500

Completions 2006 - 2017 – 940

Developable commitments 2017 - 851 & 2026 - 1791

Indicative remaining requirement - 0 (291 houses more than required)

12. Therefore, taking the Westbury Community Area as a whole, the building blocks of the Core Strategy, an over provision of some 245 houses has been achieved. The failure to analyse this demonstrates that the development requirements have not been objectively analysed. Had they been it would have been recognised that certainly no further allocation is necessary.

Justified

13. The evidence above demonstrates that no reasonable alternatives have been considered in the context of Core Policy 1, which applies to Large Villages like Bratton.

14. Core Policy 1 states Large Villages are defined as settlements with a limited range of employment, services and facilities. Small Villages have a low level of services and facilities, and few employment opportunities.

Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.

At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries.....Small housing sites are defined as sites involving fewer than 10 dwellings

15. The Policy is used in the documentation as a reason for ruling out any sites in the Small villages within the Westbury Area Remainder but is ignored in relation to the Large villages of Dilton Marsh and Bratton. Dilton Marsh is excluded for another reason – the school is full!

16. The SG cannot understand why the Plan automatically rejects any sites within the current settlement boundary. In Bratton a site exists, owned by the Parish Council adjoining and served by an access a site that currently provides 10 affordable housing units. The available site is at least as large and can be accessed along the same road.

17. Nor is the scale of development justified in the two sites. Site 321 has been reduced from 40 to 35, apparently achieved by the intervention of the site owner, and 22 are proposed for the excluded site 738. Developments of this scale bring suburbanisation to a village setting and clearly such developments fly in the face of Core Policy 1 of small scale developments to meet the housing needs of the village. More importantly, elsewhere in the Core Strategy it states that Large villages should not accommodate housing developments of more than 10 houses.

18. The SG has commissioned another housing needs survey and we await the results but local housing needs will never amount to what is proposed in the Plan. The survey conducted in the village and the public meetings demonstrated widespread support for modest housing growth and this is what we will seek to achieve. Confirmation of either of the sites will completely sabotage that approach.

Effective

19. Whilst the Plan may be achievable within the Plan period there is no evidence produced to demonstrate that a market exists for the provision of this number of homes in the West Wiltshire. Trowbridge, Westbury and Warminster all have significant allocated sites where there is little evidence of development taking place. Whilst the SG appreciates the requirement to provide additional housing sites it questions the wisdom of allocating sites in a Large village when towns are much better served to meet the needs of people moving to the area or requiring homes close to employment opportunities.

Consistent with National Policy

20. The SG understands the National Policy requires a sufficiency of land allocated for housing to meet the theoretical number identified by central government for Wiltshire. National Policy though also requires that planning authorities have regard for the principles and policies relating to sustainability. Large scale housing developments in Large villages are not promoted by National Policy. Nor, in fact, is it promoted by Wiltshire Council's own Core Strategy!

Finally

21. The SG hopes that the Inspector will reject the inclusion of sites 321 and 738 in the Plan and allows the opportunity for it to develop its own Neighbourhood Plan. The evidenc is clear. The Westbury Community Area has met its target to provide additional housing sites without the need to impose insensitive developments on the Village.

22. There is much more the SG could have said but we are aware of the information provided in the initial representation made by the Parish Council and it re-iterates its support of those statements.

23. The SG looks forward to presenting its case in detail at the Examination in Public.

**Supporting documents  
(Please see Objective)**

**Does your representation  
relate to a previous one  
you submitted at the pre-  
submission stage or**



<p><b>previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	95	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1130710	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	We are writing to support the proposed change (PC92) to remove the Ridgeway Farm, Crudwell site (Housing Allocation H2.13) from the Wiltshire Housing Site Allocations Plan. The proposed development at Ridgeway Farm is inappropriately large and were it to go ahead, would have a detrimental impact on the community for all the reasons stated in previous consultations. The proposed change to have this development removed from the WHSAP is therefore welcomed and we support it on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to 'small sites' to meet local needs. The Crudwell Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring) and will allocate land to meet identified needs. The Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future. We trust that this and similar representations will result in PC92 going ahead and thank you for your consideration in this matter.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	96	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187089	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC31				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	97	<b>Consultee</b> Esso Petroleum Ltd	<b>Agent</b> Fisher German LLP	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 712868	<b>Person ID:</b> 1187094	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [General]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>ESSO PETROLEUM COMPANY LIMITED/FAWLEY TO AVONMOUTH &amp; FAWLEY TO SEISDON RE: WILTSHIRE HOUSING SITE ALLOCATIONS PLAN Thank you for your correspondence dated 13th August 2018 enclosing details of the planning application at the above location. Our client Esso Petroleum Co Ltd, do have apparatus situated near the proposed works. Esso Petroleum Co Ltd have no objections to the proposals so long as the enclosed 'Special Requirements for Safe Working' booklet and the covenants contained in the Deed of Grant are adhered to. Thank you for forwarding this information to us.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5122095				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	98	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 473545	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC40				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The Whiteparish settlement boundary has been updated to reflect the residential status of land to the rear and in the curtilage of 'The Banks, Common Road, Whiteparish' as approved by extant planning consent reference S/07/1416 dated 27 February 2008.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	99	<b>Consultee</b> Newland Homes	<b>Agent</b> Director Planning Sphere	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 395553	<b>Person ID:</b> 901806	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC70				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Land ownership: Newland Homes hold a subject to planning option on the site, which extends to 2.27ha [REDACTED] Proposed allocation: the proposed allocation of Upper Studley under Policy H2.5 is supported in principle. This follows a collaborative approach that has been undertaken between the site owners and Wiltshire Council following the initial promotion of the site in 2015. Pre-application enquiry: a pre-application enquiry process has confirmed that the allocation site can accommodate a scheme of up to 47 dwellings including a 30% provision of affordable housing [REDACTED]. The vehicular access arrangements, drainage strategy and spatial layout of the scheme have been agreed as being acceptable in principle, as confirmed in a letter received from the Councils Development Management Team dated 27th September 2018 [REDACTED]. Deliverability: Subject to the grant of outline planning permission in 2019, and subsequent approval of reserved matters, the subject site is capable of being fully delivered by the end of 2021. Statement of Common Ground: Newland Homes are committed to continue to work proactively with the Council to ensure the delivery of this site, and are willing to participate in the preparation of a Statement of Common Ground in advance of the forthcoming Examination.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	100	<b>Consultee</b> Planning Officer Gloucestershire County Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 556401		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [No comment]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Thank you for consulting Gloucestershire County Council on the Schedule of Proposed Changes to the draft WHSAP. I can confirm that I have no comments to make on it.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	101	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187159	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC33				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Re: The Stables, Millditch, Bratton BA13 4SX In reviewing the settlement boundary I note you have included the development to the east of the land shown with an X on the attached plan. The land marked with an X is currently occupied by a derelict building which is capable of being converted into a bungalow to meet local housing need. I would request the Council and/or the Inspector to include the site marked X within the new settlement boundary as this will have the effect off rounding off development in this part of the Village. The land to the West is composed of Council allotments and so agreeing to this request sets no precedent for more significant development in this area.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5122937				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	102	<b>Consultee</b> Policy Planner South Somerset District Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 976774		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [No comment]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Further to your email below and my conversation with [REDACTED] to-day, I confirm that the Proposed Changes to the Wiltshire Site Allocations Plan raise no strategic cross-boundary issues for South Somerset.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	103	<b>Consultee</b> Service Manager: Planning Policy Somerset County Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 558923		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>		N/A [No comment]			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	As we are all aware, Somerset is a 2 tier local authority system. Given our statutory planning role we have no comments to make on the Schedule of Proposed Changes to the Wiltshire Housing Site Allocations Plan. Drawing upon the evidence within their respective local plan processes I am of the view that both Mendip DC and South Somerset DC face considerable constraints and challenges in accommodating their own housing need. As your documents relate to housing matters, we look towards our district colleagues to make representations on such matters. Once again, thank you for consulting us and seeking our views on this matter.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	104	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 862330	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC19				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>During an earlier consultation period, I raised a comment that some of the proposed settlement boundary changes within Crudwell did not fully recognise the residential curtilage of a number of the properties. This was due to outdated mapping being used and a delay in regards to Council approved property boundaries being formally recorded. My property is one such example. The area in question is shown in the following document: 22 EXAM. 01.19 Schedule of Proposed Changes (Sept 2018)_19of46_Crudwell.pdf In 2014, Wiltshire Council accepted that a small area of land surrounding the property (Ravenscourt) was to be incorporated within the planning unit of the property and more importantly, as residential curtilage (14/06643/FUL). A more recent application incorporated all land owned by Ravenscourt within the residential curtilage, which was confirmed by Wiltshire Council (17/10085/FUL). A recent discussion with Wiltshire Council has confirmed that Ravenscourt now consists only land associated with residential use (see Location Plan attached). I would therefore request that the land associated with Ravenscourt be incorporated within the proposed settlement boundary for Crudwell. The land is contained within a substantial and clearly defined post and rail, which has also been stockproofed. This fence line offers a very clear delineation between the residential unit and the neighbouring farmland (see images attached). This would require a small change to the boundary line within the map reference 16 &amp; 17.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>	5123973		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	105	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>		Wiltshire Housing Site Allocations Plan Heritage Impact Assessment Final Report Prepared by LUC (March 2018) (WHSAP/05)	<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	My representation is in respect of Section 7 - H2.6 - Southwick Court, Trowbridge which is found on pages 55 - 61 of associated evidence document WHSAP/05. I support the conclusions reached in that assessment and attach document Heritage Impact	

			Representation which informs this consideration.
<b>Supporting documents (Please see Objective)</b>	5124409		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	106	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1120809	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Associated evidence documents		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper - Salisbury (July 2018 Submission version) (CATP/13)				
<b>Please give details of why you support or do not support the updates to the</b>	Para. 5.23 The changes make it clear that this site is required to pay for a primary school to serve a greater area than the site itself yet no recognition is made that this site is poorly situated to serve a wider area.				



<p><b>associated evidence documents.</b></p>	<p>This is clearly illustrated by the maps in the Salisbury Transport Strategy which show its relation to existing infrastructure and facilities, public transport , park and ride sites and links to the city. Primary school children grow up and this site does not afford easy access to the Secondary Schools.</p> <p>The Sustainability Appraisal Summary site S1028 , F9 admits that ‘the site is not considered to be within walking distance of most services and facilities’ . It talks of further assessment being required in relation the sites ability to support enhanced bus services. This work should be carried out in advance of any allocation - not as an afterthought.</p> <p>The positive effects identified are not site specific and would apply to any site of this size.</p> <p>On the other hand , The negative effects identified are site specific and the impact of an incongruously large development in the landscape, the loss of good quality agricultural land ( the significance of food security may increase after Brexit) has been underestimated in the assessment. The effect of the likely increase in queueing traffic on air quality for children walking to school along the A3094 has been glossed over.</p> <p>It states that there is a moderate positive effect in that the scale of the site will help reduce poverty and deprivation in the wider community yet a site with no public transport or facilities within walking distance will compound social disadvantage for those allocated to live there in social housing as it imposes additional costs and isolation upon its occupants. This is a moderate negative effect- not a positive one.</p> <p>para 5.38 . The Salisbury Transport Strategy fails to demonstrate that mitigation schemes are achievable. On the contrary it shows at table 2.5 that the A3094 has seen the biggest increase in traffic of Salisbury roads over 10 years and its junctions at either end lack capacity. As the Strategy does not propose to provide any increase in capacity (no new roads) there is no way the effects can be mitigated.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	107	<b>Consultee</b> Mendip District Council	<b>Agent</b>  <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 639331		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [No comment]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I am writing in response to your consultation on proposed changes in connection with the Wiltshire Site Allocations Plan I can confirm the Mendip Council was notified of consultation on the pre-submission plan (in July) and this additional consultation. The Council did not submit representations on the Submission Plan. The Council notes that the proposed changes do not alter the adopted spatial strategy And it supports the overall intent of the proposed changes to focus allocations in principal centres rather than market towns.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	108	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1134103	Planning Partner Brimble, Lea & Partners  <b>Person ID:</b> 931633	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC29				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	This representation supports the proposed change to the pre-submission Warminster Settlement Boundary to include The White House (93 Bath Road) on the basis that this is built residential development that is physically related to the settlement boundary (map grid reference F4, G3 and G4). The decision to revise the settlement boundary in respect of The White House addresses the representation that I made to the pre-submission draft Wiltshire Housing Site Allocations Plan on 21 September 2017 (Comment ID: 2685).				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	109	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1125255	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport. The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in an hour. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special landscape Area and Salisbury Plain SPA ( Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement.</p>			

	<p>Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 Will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. We have no objections to a moderate number of houses, but for all the reasons above, this is too many.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	110	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1182626	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC14				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Last year, on 20th September 2017 I provided a comprehensive objection, primarily to the proposed removal of an area in Hullavington which is currently in the Framework Boundary on both justification and soundness grounds. I was contacted by letter by your department on 25th September 2018 specifically because I had commented previously, but I cant find my comments, or if they have been addressed on any of the documents posted online. So whilst evidence points to the fact that you received my documents (from your letter dated 25/9/18), I cant find where they have been captured and/or addressed. For completeness, I am therefore writing further, duplicating those comments and objections (in the attachments) but also using the fact that because they seemingly havent been noted or addressed, as evidence that the process followed has NOT either been sound and therefore, arguably, not legal compliant (although I am not an expert on the latter). I wonder that if all comments havent been captured or addressed, how many times has that happened? and therefore, how valid is the whole process?				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	111	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1182626	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC14				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Please find attached a new objection to the soundness of the Wiltshire Housing Site Allocations Plan together with the two attachments Objection/Comments as follows: Objection on the basis of Justification and Soundness Further to my previous objections (dated 20th September 2017) specifically to the justification of the proposed removal of the an area of land in Hullavington, (J6 and J7 on the map which illustrates the Hullavington Framework Boundary), I am writing to object further with additional information and additional reference points, noting actions which have taken place during the past 12 months, which continue to underscore that this removal is not justified and does not meet the criteria laid out by Wiltshire CC: The key criterion for removal is that the land should be more closely linked to the rural form, but this absolutely is not the case, and recent actions link the land much much more to the built form than it was before. What I trust is evident from the attached annotated aerial photograph, is that the land in question is clearly more closely related to the built form and unmistakably bordered from the open countryside by a well-established stone wall. This same stone wall borders other neighbouring residential properties on both sides of the development site (East and West). In addition, 18 months ago, neighbouring farm buildings were removed and a new development of circa 14 homes was built (Old Farm Close), which borders the site to the North hence agricultural buildings have been removed on 2 boundaries of the development site in the past 2 years and converted to residential, clearly strengthening the relationship of the site to the built up area distinct from the open countryside. Perhaps more importantly, a planning application for two new homes was submitted in April 2018, ref: 18/03185/FUL for two new homes on the same development site that is proposed for removal from the Framework Boundary. I therefore wish to strongly object to the justification and soundness of the plan and the application of the criteria, which is clearly incorrectly applied in this particular example, or not applied at all. The strong objection is on the basis of the lack of physical logic on the ground to exclude the site. This is particularly true given the planning departments professional support for the lands suitability for development, evidenced by the Case Officers recommendation to the Committee, to accommodate new dwellings. See link below. <a href="https://unidoc.wiltshire.gov.uk/UniDoc/Document/File/MTgvMDMxODUvRlVMLDExNzg2NTc=">https://unidoc.wiltshire.gov.uk/UniDoc/Document/File/MTgvMDMxODUvRlVMLDExNzg2NTc=</a> With regards to justification, it also says in the WHSAP documentation that the Plan isnt a desktop exercise but will solicit local Case Officer opinion, who is familiar with the locality. As can be seen, the local Case Officer identified that this land is suitable for sustainable development! In addition, the LPA previously referenced the unmet housing need in the area of 158 homes (which has now been amended to 138) and there is no ceiling to appropriately sited housing. Why is it therefore sound to remove areas from the Framework Boundary, when there is local unmet need and the documented justification clearly has not been applied. It should be noted that this unmet need was calculated prior to the announcement that Dyson had purchased the neighbouring 519 acre airfield site, which will lead to the creation of circa 10,000 future jobs. Even</p>			

	<p>if the situation was ambiguous, then no change should be the outcome, but in this particular case there is absolutely no ambiguity and no justification for its removal. To do so would make the process adopted unsound. To really highlight the lack of justification there is a proposed change to the Hullavington boundary in the process with the reference SBR PC14, which has the following note: Amend pre-submission settlement boundary to include the school playing fields. This is the curtilage of community facility that relates more closely to the built environment (e.g. a playing field) and has limited capacity to extend the built form of the settlement in terms of scale and location. If any independent Inspector looks at these situations, it underscores the fact that the removal of the land to the rear of Mays Farm (J6 and J7 on the Hullavington Framework Boundary Map) is not justifiable. Please could you bring this situation to the Inspector, such that the land in question is NOT removed from the Framework Boundary as I believe that there is no clear logic to support the change. Thank you</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5124629</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	112	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187385	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should see k to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport. The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its</p>			

	<p>pavement and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	113	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1125430	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [H2.2, H2.4, H2.5, H2.6]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>I am writing to put forward my objection of the above planning permission. I feel having lived in this area for 24 years now I can offer valid points on how the building of new houses will effect the surrounding area and the people of Trowbridge. I live at [REDACTED] Trowbridge. My house being in the corner, is side on to the A361 Frome road Trowbridge. The A361 is a main trunk road into Trowbridge, used by heavy goods as well as cars and vans etc. There is congestion always in the mornings of traffic flowing into Trowbridge. Its at a standstill. Not only is there noise but air pollution. The traffic simply cannot flow. Building houses on Site 1021 (adjacent to Church Lane) Site 3260 (land at Upper Studley) this traffic will join onto the A361 Frome road. I believe a roundabout is suggested at these sites, which will further add to the problem. I have also considered that being family homes, children will be commuted to schools. In the proposal the local school was put as Walwayne School, Broadmead, Trowbridge. At a distance of nearly 3 miles , I can't see parents walking their children to school! As most families have two parents working, most households have two cars. The children are commuted to school enabling the parent to then go on to work. Hence adding to yet more congestion on the roads. As I have mentioned living in this area for the last 24 years, I have seen the flooding to the Southwick Country Park and the main A361. I believe that building on Site 1021 and Site 3260 will cause further problems in the future. Both sites and on the hillside. The water then loses its drainage through the soil. It will find its own level and being a dip between Whiterow hill and Southwick, will collect there. I have seen this dip flooded, where only HGV's could pass through. Not only that the Southwick Country Park will also flood more. It does currently with heavy days and months of rainfall. Given the fact our climate is changing, I foresee more of this. My concerns on houses built on the A361 are also linked to the Saturday fun run at Southwick Country Park. The carpark could hold possibly 35-45 cars. There are in the region of 200 runners on a Saturday. The cars the spill out and park on the main A361, in both directions. HGV's are held back on the hill Southwick end because they have to wait for oncoming traffic and a gap. This will cause serious problems if the houses are built AND a roundabout is put in!!! Runners are asked to park at the college which some do, others park along Silver Street Lane, again causing more congestion. The land on Site 1021 and Site 3260 is green land and offers home to wildlife. Deers and often been seen in the fields off Church Lane. Foxes, kingfishers, butterflies, insects, bats can all been seen. I feel this must be considered when building houses here as it will spoil the Country Park. So , my objections for Site 1021 and Site 3260 are; Air Pollution and Noise pollution from traffic. Disruption to a natural habitat for wildlife Building on land which will flooding elsewhere Site 3565, Land east A361 at Southwick Court, again this is put forward as a huge site for houses. I have seen this land at the bottom of Spring Meadows, where you can access these fields under 18inches of water. It is a flood plain!! I've seen some of the houses at the bottom of Sandringham Road (which backs on to this area) have their gardens flooded. The site will</p>				

	<p>join traffic to Spring Meadows, Sandringham Road and Balmoral Road, which in turn join onto Silver Street Lane. This will cause colossal traffic to an already busy Area. Parents park on Silver Street Lane due to yellow lines outside The Grove School. Adding more houses will simply congest this area. Not only that, this traffic will join onto Bradley Road and Frome Road. The road infrastructure simply cannot cope with the traffic. Weekends the Bradley Road is at a standstill because of the Spitfire Retail Park. The traffic just cannot flow. It backs up onto the Whitehorse Business Park. Not only can you not get into Trowbridge, you can't get out!!!! Again is the issues of school, parents commuting, more traffic etc. I do feel that it will also spoil the land which separates Trowbridge From Southwick. Building of houses will join the two up. It takes away again land which is tranquil and of natural beauty, home to much wildlife. My objection to Site 3565 is; Noise and Air pollution Traffic congestion The spoiling of land which is of natural beauty. Building on flood plain. I feel the building of these site won't enhance Trowbridge and object to it.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	114	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187388	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>		Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)	<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	The following are my views on the above consultation. 1. Each site exceeds the housing needs of the village and will not increase employment opportunities. 2. The combined total of sites 321 and 738, plus 2 or 3 additional houses proposed for the Oxford House, 12 The Butts site exceeds the number	

			<p>of houses required in Wiltshire Council's Policy,</p> <p>3. Development of sites 321 and 738 would generate a vast amount of additional traffic leaving and joining the already busy Westbury Road at a point where vehicles tend to speed when entering and leaving the village.</p>
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	115	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187391	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should see k to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport. The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its</p>			

	<p>pavement and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	116	<b>Consultee</b> Parish Clerk Pitton and Farley Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 392675		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [General]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Response of Pitton & Farley Parish Council to the Wiltshire Council SHLEAA consultation 2018 The Parish Council's view remains the same as in 2015 ie that any substantial development in Pitton, apart from infilling, will have a detrimental impact on the existing infrastructure, and consequently will widen and worsen the effects of any flooding which may occur in the future. The Parish Council would strongly resist any new development in Pitton, unless and until the impact of flooding is ameliorated as far as possible. You should be aware that access to the Pitton sites via Above Hedges/Black Lane/Church Lane are single tracks at all the entrances/exits. Access to 'The Orchard' site is within a flood zone. All proposed sites are outside the housing policy boundaries. However, the Parish Council recognises that some small scale development is necessary within the parish in order to keep both individual settlements of Pitton and Farley sustainable, and would like to undertake a Housing Needs Survey to establish what the communities' particular needs are.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

Comment ID:	117	<b>Consultee</b> <b>Person ID:</b> 1124313	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
				<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>		PC94			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		Positively prepared - Development requirements have not been objectively analysed, nor analysed in compliance with National Policy. The NPPF require a buffer of land for housing of 20% where there has been under delivery instead of the 5% mandated. The County Council has included a 20% buffer in spite of no under-delivery within Wiltshire as it would be prudent. If my calculations are correct, this means that Wiltshire CC are planning for 24,740 dwellings for North and West Wiltshire when according to the NPPF they should only be planning for 21,648 and as they already have completions and developable commitment totalling 23,631. it is difficult to see how the additional minimum to be allocated of 1,109 can be justified. Within this context Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The allocation is also contrary to the Wiltshire Core Strategy which seeks to avoid out-commuting and the provision of employment to complement any additional housing. The proposed allocation to Bratton does not appear to be accompanied by any proposals (nor land sites) for additional employment (See the statements of EXAM / 02A (WHSAP Sustainability Appraisal Sept 2018), under the title Education and Skills, states that Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work. and under the title Economy and Enterprise, states that Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport. The reduction of 5 houses in PC 94 does not materially impact on the following: Both sites 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council appears to have made errors in the assessment of Bratton as a Large Village by counting 2 Recreation Fields, 1 Childrens Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Childrens Play area and 1 Sports Pitch. Both proposed sites are considered modest developments, but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the			

proposed 15-year growth of the village to 12.9%. The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. In particular, any out-commuting to Trowbridge is likely to use Court Lane which is a narrow, deep lane which in places is insufficient for two vehicles to pass and which is already dangerous for pedestrians as the major parts of the road lack any pavement on either side, in particular in areas where there is limited visibility. The sunken nature of the road, together with the hedges etc also make the road dark even in the summer and exits from the side roads particularly hazardous. Increasing out-commuting will increase the risk of serious accidents to pedestrians and minor accidents to vehicles. In addition existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across Court Lane is unsafe due to the hazardous road junction at Court Lane (it is a blind junction owing both to the bend, the acute nature of the turning, the immediate drop in height, the bend within 20 metres of the junction, and its sunken nature), the quantity of traffic using the highway and the inadequacies of the existing pavement. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Both sites will also alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Both sites will intrude on the benefit provided by the footpaths along the scarp of the hillside above Bratton. Proposed landscaping with trees and shrubs conflicts with the wide-open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area) and will also be ineffective for a large part of the year. Developments of this size will add to the existing pressures on Bratton Surgery; closing this surgery and requiring all Bratton residents to use the White Horse Medical Centre in Westbury will add to traffic problems as well as reducing the quality of life of the residents of the village. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective Large developments at Large Villages are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in Large Villages are not promoted by National Policy, and the calculations which have led to the proposed allocations are flawed. I believe that the allocations have not taken note of the environmental impact commissioned by Wiltshire County Council, for example (but not restricted to) the fragility of water supply.

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-</b></p>			

<p><b>submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	118	<b>Consultee</b> Parish Clerk Bratton Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1125770		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				
<b>Please give details of why you support or do not support the updates to the</b>	Wiltshire Housing Site Allocations Plan - Focussed consultation on the Schedule of Proposed Changes and associated evidence documents				

**associated evidence documents.**

1. This letter, drafted by the Chair and vice-Chair, is sent to you as a holding response as agreed in an exchange of emails I had with you. The content will be considered by the Council on 13 November and I will let you have details of any further comments, deletions or amendments by 14 November.
2. The Council is disappointed that this further consultation has come about at this late stage after the appointment of the Inspector. The Guidance on responding to the consultation which you sent to me is complicated and this further consultation compels the Council to repeat that the whole process is incredibly difficult for lay persons to understand.
3. The amount of documentation and the scale of the alterations introduced is overwhelming. Appendix 1 attached to this letter itemises the changes that have been identified which relate to the Parish. In this letter, the Council has tried to simplify the issues and endeavoured to respond by reference to the four principles that the Inspector will apply when considering your Council's submission – namely positively prepared, justified, effective and consistent with national policy.
4. The Council responded in detail to the original submission with a letter of representation dated 22 September 2017, a copy of which is annexed at Appendix 2. This further representation needs to be read in conjunction with that letter. The principal issue that the revised consultation has brought to the attention of the Council is the re-admission of site 738 south of Westbury Road almost opposite to the included site 321, and the consequential addition of many new pages of Proposed Changes and the wholesale re-writing of the Bratton section of the Community Topic paper of Westbury  
  
Conflict with existing policy
5. The Council's position is that they are opposed to the scale of the development proposed on each of those sites. Inclusion of either is in fundamental conflict with Wiltshire Council's own Core Strategy. That Strategy states that the priority is to locate housing development in the top two tiers of settlements, the Principal Settlements of Chippenham, Trowbridge and Salisbury and the Market Towns, including Westbury. Furthermore the Core Strategy recognises that the other areas of the County are rural countryside which need protection. There is no strategic need to develop in open countryside adjoining Large Villages.
6. The Core Strategy Policy No 1 reads:-  
  
Large Villages are defined as settlements with a limited range of employment, services and facilities. Small Villages have a low level of services and facilities, and few employment opportunities.  
  
Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.  
  
At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries.....Small housing sites are defined as sites involving fewer than 10 dwellings
7. The proposals in this Plan are totally inconsistent with the Council's own Core Strategy. The Plan is not positively prepared and the proposals are not justified when weighing this evidence.

Core Strategy targets delivered

8. According to the Regulation 22 (1)(9)(C) statement the purpose of the Plan is to:

Allocate sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026.

9. The Target for the Westbury Community Area identified in the Core Strategy was 1,615 houses (sub-divided 1,500 to the Town 115 to the Remainder). Paras 2.9, 2.10 and 2.11 and table 2.3 have been added to the Wiltshire Site Allocation Plan – Westbury Community Area Topic paper following receipt of the latest figures contained in the Housing Land Supply Statement.. Para 2.11 makes it clear that the developable commitments 2017 -2026 shown in the Table 2.3 excludes any proposed allocations.

10. This Table shows that, so far, the Town of Westbury has delivered 940 homes and the Remainder 60. So a shortfall of 615. The developable commitments (excluding any proposed allocations), in the Westbury Community Area amount to 862 making a total 1862. This is an over-provision of 242 (15.29%), way in excess of the total of 1,615 originally allocated in the Core Strategy.

11. In the Market Lavington Topic paper the following appears at 7.2:-

However, in the light of the significant supply of housing land in the East Wiltshire Housing Market Area the Council's Schedule of Proposed Changes (July 2018) proposed the deletion of the site allocations that emerged from the site assessment process. Similar to the position with Large Villages there is the opportunity, as set out in paragraph 6.4, for the Market Lavington Parish Council to allocate land for housing in their emerging Neighbourhood Plan.

12. So a 'significant supply of housing land' in one community area has led to the deletion of sites in a community identified as a Local Service Centre and by definition, therefore, one that is intended to have some significant development. Why cannot a similar decision be made in respect of a Large Village and allow the Neighbourhood Planning process to identify and allocate land for housing to meet local need in accordance with the requirements of the Core Strategy and Government policy?

13. The target for the Westbury Community Area has been met. Government Policy has been complied with and the provision identified in the Core Strategy for the number of homes in the Westbury Community Area achieved. The allocation of sites in Bratton is not justified in the light of the evidence produced in the Housing Land Supply Statement.

Neighbourhood Plan

14. Prior to the election in May 2017, the Council had considered the cost and effort in developing a Neighbourhood Plan was unnecessary, in the light of the Core Strategy Policy stating clearly that housing in Large Villages should be confined to meeting local needs. The Council elected last May, however, resolved to develop a Plan.

15. A Steering Group was established in February 2018 after a series of public meetings and a Parish wide survey. It is clear from all the responses that there is no fundamental objection to further housing in the Village. What is of concern is the 'suburbanisation' of the village by the



creation of high density developments. With housing numbers of 35 -40 and 22 which far exceed the definition of “mall housing” of fewer than 10 dwellings.

16. The Neighbourhood Plan is well underway albeit with a six months' delay whilst the Council waited for a County Liaison Officer to be appointed. A Housing Needs Survey has been carried out. The draft report has just been received. It shows a small demand for local housing (5 properties). Once the final version is received the Council will forward the Report to the Inspector. The Neighbourhood Plan will be analysing potential sites to meet the housing need identified and will be carrying out further work to refine the information by considering evidence provided by Wiltshire Council's Housing Register and the Strategic Housing Market Assessment. The Westbury Area Topic paper on page 66 used information from the 2013 Housing Survey to identify local need. The new survey reduces demand from 8 to 5. Potential for housing within the village existing village settlement boundary is shown as Omission Site OM007 in the Proposed Changes. This opportunity will be fully investigated by the Steering Group.

17. The allocation of either sites 321 or 723 would destroy the Neighbourhood Plan initiative and is contrary to Government Policy which supports communities in developing such Plans. A potential housing site in the Village has been omitted.

#### Fundamental error

18. Despite the Council's submission made in 2017 pointing out the incorrect figure the Council's officers have not changed the figures and have repeated the error with site 738. The Westbury Community Area Topic paper still states the Village consists of 819 houses whereas the correct number is 516. An overstatement of 38%.

19. Such an error (not corrected) is not legally sound.

#### Sustainability, highway, and environmental issues

20. The differentiation between the sites 738 and 321 is negligible at Stage 3 and Stage 4, steps 1 to 4, yet the sustainability of site 321 is assessed as 'good' and site 738 as 'marginal'. The Council has seen the detailed representations of local resident, [REDACTED], who alongside the vice-Chair of the Council has examined in detail all the documents relating to this consultation. The Council supports and concurs with all the points made in that submission. The Council re-states its concerns in relation to site 321 as set out in the submission letter of 22 September 2017.

21. The decision to reject one site but keep the other is not sound. The decision to allocate so many houses to a Large village is contrary to Government Policy.

#### Precedent and consistency

22. The Council has not been able to analyse all the changes in the documentation but it notes numerous variations where sites have been excluded for reasons which could equally apply to Bratton. It is noted that some sites in communities where current Core Strategy policy permits housing growth have been removed because (extract from the Market Lavington Community Area Topic paper):-

	<p>Development at this site would very likely have a significant adverse impact on the amenity and setting of the Conservation Area. It would be difficult to achieve a pattern of development that protects and enhances the character of the settlement and the Conservation Area. Achieving a suitable access would be problematic without further negative effects on the Conservation Area, neighbouring residents and highway safety.</p> <p>23. Bratton has all these qualities (see [REDACTED]'s representations) yet a contrary decision is taken in respect of sites 321 and 738, eliminated on just a single ground relating to cycling and pedestrian access and safety reasons. By the way, those reasons should apply to both sites as they are almost opposite one another on the same highway but the issue of 'accessibility' for site 321 does not weigh up good cycling connections, unlike for site 738. Nor does it consider the need for cyclists to cross the road when returning to site 321 from Bratton.</p> <p>24. Based on this inconsistent and unsound approach the Parish Council consider continuing to promote sites in Bratton is unjustified</p> <p>As I said above, I will confirm the Parish Council's position on November 14 after it has considered this holding letter.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	119	<b>Consultee</b> Clerk North Bradley Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 391306		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC60				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1.0 Introduction 1.0 This is the formal response of North Bradley Parish Council to the Focussed Consultation of the Schedule of Changes to the Wiltshire Housing Site Allocations Plan (HSAP). The Parish Council acknowledges the change in respect of the Strategic Site 298 H 2.2 Land off A363 at White Horse Business Park following submissions on behalf of the Parish Council. While the Parish Council would prefer that this site is not developed, it does not wish to impede the delivery of a strategic site and recognises the need to avoid conflict between higher level plans and the NDP. On this basis only it therefore SUPPORTS the allocation of all the proposed strategic sites (Elm Grove Farm (SHELAA Site 613, HSAP H2.1), Southwick Court (SHELAA Site 3565, HSAP H2.6) and Land off the A363 at White Horse Business Park (SHELAA Site 298, HSAP H2.2). 1.1 HOWEVER, while the revised HSAP indicates that the quantum of development on site 298 / H 2.2 has been reduced to facilitate the creation of a meaningful landscape gap between the site and Trowbridge, it does not take account of the work already done between the Neighbourhood Plan team, the teams professional planner, landscape architect and the LPAs own ecologist. The Parish Council therefore believes that it is necessary to add more detail to the plan text in order to: Provide the clarity expected from a Development Plan Document Ensure that landscape and biodiversity are appropriately protected in the final HSAP Ensure proper co-ordination between the HSAP and the emerging North Bradley Neighbourhood Plan as required by the NPPF and PPG. 1.2 This Response also comments on the proposed settlement boundary changes to North Bradley village, which the Parish Council SUPPORTS. 2.0 Policy H 2: HSAP Site H 2.2 / SHELAA 298 Land off White Horse Business Park 2.0 The proposed change indicated at PC60 in the Extended Consultation document reduces the number of homes at site H2.2 (land off the A363 south-west of the White Horse Business Park) from 225 to 175. The explanatory text says that this is; To reflect the resolution of Wiltshire Councils Cabinet, the capacity of allocation H2.2 is proposed to be amended. It was previously proposed through a schedule of proposed changes put before May Cabinet that the site capacity should be increased from 150 dwellings to 225 dwellings in order to maximise efficient use of land whilst protecting heritage and ecological interests. However, as a result of subsequent further consultation is was resolved by Cabinet in July 2018 that the figure of 225 should be reduced by 50 dwellings, to 175. This would better enable the provision of a strategic landscape buffer between Trowbridge and the village of North Bradley. 2.1 This is welcome. However, in fact the resolution of the Cabinet reflected the emergence of the North Bradley Neighbourhood Plan, brought to Cabinets attention by local councillors. This emerging Neighbourhood Plan establishes a defined landscape buffer between Trowbridge and the village of North Bradley. Through discussions with the county ecologist It also goes further than this and puts forward a specific general layout for site H 2.2, designed to provide a</p>				

satisfactory landscape gap (as determined by professional landscape architect consultants) which is also optimal in respect of the flightpaths and foraging corridors for the protected bats of the Bath and Bradford on Avon SAC (as suggested by the County Ecologist). 2.2 As it stands, the allocation of site H 2.2 in the HSAP covers the following matters: a) Number of dwellings b) Need to separate Trowbridge and North Bradley and respect setting of the village c) Need to focus development proposals within the north-east of the site d) Improvements in walking and cycling infrastructure e) Retention of landscape features f) Need to create a dark corridor for bats g) Contributions towards school and medical facilities. 2.3 However it does not include: The fact that a more detailed site layout is being developed by the North Bradley Neighbourhood Plan (NDP) That the NDP will contain a landscape setting policy covering the entire area. That the preferred layout in the NDP does NOT concentrate development in the north-east as proposed in the HSAP but west and south-west - adjacent to the village. This has been discussed and agreed between the landscape architects advising the NDP and the County Ecologist. Of all the above points, point c) is the most critical. As presently written there is likely to be a conflict between the NDP and the HSAP on this point. 2.4 It is accepted that the North Bradley Neighbourhood Plan has not yet reached the Regulation 16 stage. However, it seems likely to do so before the HSAP is adopted. It should therefore be possible to make some mention of the link between the two plans, at least in general terms at this stage. This would not be putting too much weight on an emerging plan, simply improving co-ordination between community and council planning at an appropriate stage (working constructively as advised by PPG paragraph 43) and demonstrating awareness, support for Localism and good practice. It would also be allowing the NDP to achieve the role anticipated for it in NPPF paragraph 28 in adding value and detail to the Development Plan, something that would provide greater clarity and opportunity for engagement by the developers of Site H 2.2. 2.5 It is therefore suggested that the following changes (indicated in [BOLD] text) are made to the text of Policy H 2.2: 5.52 Approximately 25.26 ha of land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 175 dwellings, as identified on the Policies Map. It is reasonably well located with regard to services and facilities. The site extends over a significant area of agricultural land used for a mix of grazing and arable cropping. It is contained, to a degree, by existing development to the east and west and fronts a gateway route to the town. An objective of detailed design and layout will be to retain visual separation of the Towns urban area from North Bradley village. The issue of the setting of the village of North Bradley is currently being taken forward by the emerging North Bradley Neighbourhood Plan which aims to create a landscape setting policy and suggests a general site layout for this HSAP site. The NDP has yet to reach The Regulation 16 stage, when it will have significant weight, however it is already clear that to achieve a satisfactory design, creating a suitable landscape buffer while simultaneously conserving biodiversity, development proposals would need to be focussed within the west and south-west of the site, screened with new planting and provide improvements to walking and cycling routes through to the town. 5.53 The site is characterised by a distinctive pattern of mature and semi-mature hedgerows and trees that form a feature in the landscape. Development of the site would need to retain these features and thereby provide a layout that respects the setting of North Bradley village as an important element of detailed design. Existing hedgerows and trees also provide habitat for protected and non-protected species. These natural features therefore provide wildlife corridors that link habitat features within the local area; in particular, dark corridors for foraging bats. This matter is addressed further in the emerging North Bradley Neighbourhood Plan and its supporting documents which include a landscape assessment and have involved the participation of the County Ecologist. These documents will achieve significant weight once they reach the Regulation 16 stage. 5.54 The site is in an area likely to be used by Bechsteins bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: woodland belts associated with the White Horse Business Park; a network of mature hedgerows/hedgerow trees; and the grounds of Willow Grove. 5.55 These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechsteins bats. Development will be required to contribute towards the delivery of the Trowbridge Bat Recreation Management Mitigation Strategy.

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	5125583		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	Yes

<b>Comment ID:</b>	120	<b>Consultee</b> Clerk North Bradley Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 391306		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC28				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 3.0 The revised HSAP proposes settlement boundary changes as indicated on the map below. The Parish Council support these changes which represent good housekeeping, tidying the boundary to reflect the current pattern of development.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5125583				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	121	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187418	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC42				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Settlement Boundary Review Tuckingmill Settlement Boundary Review West Tisbury Wiltshire This review was a very late amendment that has not been responded to by the West Tisbury PC at this date. The residents of the affected area to be reviewed have had little knowledge of this proposed change. The Draft Settlement Boundary review states in 5 (5.1) Areas which have been excluded are- Curtilages of properties which have the capacity to extend the built form of the settlement, This includes large residential gardens. Recreational or amenity space at the edge of settlements which primarily relate to the countryside (inform or nature ) Isolated development which is physically or visually detached from the settlement (including farm buildings or agricultural buildings, renewable energy installations). Also Ref 8 (8.1) The areas which have been excluded are- Extended curtilage of a property that relates more closely to the open countryside (e.g. a field or paddock) or has the capacity to substantially extend the built form of the settlement in terms of scale and location. Recreational or amenity space at the edge of the settlement that relates more closely to the open countryside. My comments on the proposed change review are as follows. 1. The current boundaries of the properties that are affected show they were always part of Pythouse estate which makes up the field complex which extends to the Southeast. The two gardens in the review do not need to be included in the revised boundary curtilage. 2. It appears that the proposed curtilage boundary line has been drawn to keep the line straight and for no other good reason. 3. If the boundary is moved it could in the future open up the feasibility of development of this open countryside area which does not follow the methodology criteria used in this review.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		



<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	122	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1185926	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC93, PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a Large Village by counting 2 Recreation Fields, 1 Childrens Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Childrens Play area and 1 Sports Pitch. Both sites are considered modest development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM / 02A (WHSAP Sustainability Appraisal Sept 2018), under the title Education and Skills, states that Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work. and under the title Economy and Enterprise, states that Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport. The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. There is a severe effect on the dwelling at 40 Westbury Road which will change from a rural setting to surrounded by houses to the North, West and South West if both sites are developed. Effective Large developments at Large Villages are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in Large Villages are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	123	<b>Consultee</b> Friends of Southwick Country Park	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187466		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [H2.4]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] We do not consider this proposal legally compliant because: it is not consistent with county policy as laid out in the Executive Summary of the Methodology Used to Select Sites (2a. on p.1) which says: SHLAA sites are rejected from further consideration or their capacity reduced where affected by obstacles to development such as heritage and wildlife designations and flood plain ...; it fails to meet requirements of Wiltshires Core Strategy Policy 50 (p.260) and to apply assessment criterion 1 (p.92) of the Sustainability Appraisal as laid out in European Directive 2001/42/EC: Protect and enhance all biodiversity and geological features and avoid irreversible losses it fails to meet standards set by UK Governments Water Framework Directive. I. The Friends of Southwick Country Park [FoSCP] believe that this site should not have been selected. The Lambrok Stream at the foot of this steeply sloping site, separating it from Southwick Country Park, supports a complex biota that contains species that are protected and species that are vulnerable: Water vole (<i>Arvicola amphibius</i>) - protected under the Wildlife and Countryside Act 1981; Scarce Chaser Dragonfly (<i>Libellula fulva</i>) - listed in Category 3 in the British Red Data Book for Invertebrates Steve Covey, Wiltshire recorder for Dragonflies and Damselflies, writes about the Scarce Chaser in a mail dated 16.10.2018: Bradford on Avon and Melksham is the primary site for this species in Wiltshire. I suspect the park is used as a maturation site for <i>L. fulva</i> which then moves back down to the Avon to breed. In any case, development would affect these watercourses and maybe reduce the number of maturation sites this species might have available Eight species of Odonata (dragonfly and damselfly) see Appendix 1, have been identified in the park. Opposite-leaved pond weed (<i>Groenlandia densa</i>) - listed as vulnerable in both the IUCN's Red List and in the British Red Data Book for vascular plants. Bullhead (<i>Cottus Gobio</i>) - a reportable species in Wiltshire; The River Avon Special Area of Conservation requires the monitoring of local populations of Bullheads. Spined Loach (<i>Cobitis taenia</i>) this a tentative identification of a very rare species that would be listed under Annex II of the EC Habitats and Species Directive. Photographic evidence has been sent to DEFRA. A colony of Swan Mussels (<i>Anodonta cygnea</i>) estimated to be at least 60 years old, indicating good water quality. Bechstein bats (<i>Myotis bechsteinii</i>) listed in Annex II of the EC Habitats Directive, come from the Green Lane Wood roost, using the Lambrok as a green corridor, to feed in the park and the Church Lane site on the insects that breed in the parks stream and ponds. Nine species of bats (see Appendix 2) have been identified in the park. Increased activity this summer has suggested a change in behaviour yet to be assessed by the Wiltshire Bat Group. Thirty nine identified species (see Appendix 3) in the park are directly dependent on Lambrok Stream. Access Southwick Country Parks full species lists here for details of when, by whom and with what evidence identification was made. II. The Friends of Southwick Country Park believe that residential development on the Church Lane site cannot enhance biodiversity in Lambrok Stream and will result in the irreversible loss of species. Wiltshire</p>			

	<p>Council is applying for Local Nature Reserve status for Southwick Country Park. In response to a 2017 application (No. 17/03269/OUT) to develop land between Trowbridge and Southwick, Natural England wrote: If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application. FoSCP believes Wiltshire Council does not have sufficient information to fully understand the impact of the proposal. The Environment Agency, has assessed Lambrok Stream. as part of the Bristol Avon Catchment, since 2009. The current status of the Lambrok is moderate and the EA has a target of good by 2027. Run off from housing development is likely to carry oil from vehicles, salt from defrosting activities, herbicides and nutrients from garden run-off. These will lead to deterioration of the Lambrok water quality unless the run-off is treated using some type of EA approved constructed wetland. The EA classes the Lambrok as a river; this affects which legislation will apply to it. Residential and commercial development are considered significant threats to Opposite- leaved Pondweed. Odonata are indicator species; their life cycle is both aquatic and terrestrial and they respond to stressors in both environments. Research has shown that urbanisation will always result in reduction of numbers and/or species loss. There has been a 90% loss in Water Vole numbers since the middle of the last century which is attributed to fragmentation of habitat, urbanisation, predation and loss of riverside vegetation. FoSCP believes that development at this site will result in the disappearance of the parks small population of Water Voles. Odonata, Swan Mussels and Bullheads depend on the maintenance of high water quality; in particular, the run off from a construction site would do irreversible damage. III. Development at the Church Lane site, the Upper Studley site (H2.5) and Southwick Park site (H2.6) site will not be consistent with the UK Governments ten year plan for the improvement of British waterways. We believe that development at these sites will reduce the water-quality of Lambrok Stream. Wiltshire Council is a partner in Wessex Waters Bristol Avon Catchment Plan which states: Any waterbody that does not meet good ecological status is classified as failing under the European Unions Water Framework Directive. The UK Government aims to ensure all waterbodies meet Good Ecological Status by 2027. The ecological status of Lambrok Stream has been assessed by the EA as moderate on a five point scale (high, good, moderate, poor, bad) and a target of good set for 2027. We believe that Development at the Church Lane, Upper Studley and Southwick Court sites will have a deleterious effect on the water quality of Lambrok Stream. contrary to the improvement which is being sought. Lambrok Stream is part of the Bristol Avon Catchment Plan (BACP). The Bristol Avon Catchment Partnership is developing a 10 year plan that will address environmental issues and target resources. No development should be considered on the H2.4,5 and 6 sites until this Action Plan produces more information. The relevant details of the BACP are in Appendix 5.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5126298</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	124	<b>Consultee</b> Friends of Southwick Country Park	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187466		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC68				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR FULL REPRESENTATION] The Friends of Southwick Country Park believe that the park and the site at Church Lane are parts of a single landscape, the biodiversity and geodiversity of which should be protected The Lambrok Stream is not a barrier between the two or a boundary to either; it is the centre of a shared geology and ecology. See Appendix 4 Together the park and the sites at Church Lane, Upper Studley and Southwick Court form a single historic landscape of water meadows and old pasture. It is a buffer between town and country which encourages wildlife into the park and protects it from disturbance. The park, Lambrok Stream, the open land. mature trees and veteran trees at Southwick Court and Upper Studley form a wildlife corridor between Trowbridge and the villages of Southwick and North Bradley. The bats from the Green Lane Wood roost use this corridor when they come to the park to feed.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5126298				



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	125	<b>Consultee</b> Friends of Southwick Country Park	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187466		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC69				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Lambrok Streams ecological importance has not been properly assessed. The Friends of Southwick Country Park believe that it will not be possible to protect Lambrok Streams biota from the consequences of development at the Church Lane site and that the development of the site will incur loss of habitat for the parks wildlife. See Response to PC67 The site is steepest on its eastern boundary, the slope exceeding 5%. Tree and hedgerow planting along the SW margins of the site, as proposed will not protect Lambrok Stream from domestic run off or from the effluvia of a building site. See Appendix 4. The site is rough unimproved grassland: old pasture. The perimeter and internal hedges, and the dense scrub at its edges provide daytime cover for roe deer and nesting sites for birds; it supports a large population of field voles, prey for buzzards, owls, kestrel and foxes. The mature oaks in the hedges at the north east boundary and the veteran oak at the centre of the site are roosts from which barn owls hunt. Otters, kingfishers, herons and egrets come up the stream from the River Biss to feed in the park. and in the Church Lane site. During the summer, residents in Church Lane recorded increased bat activity over the site. This has been reported to the Wiltshire Bat Group who have yet to investigate. Wiltshire Councils Tree and Woodland Officer is checking our oaks for signs of new roosts. Residential development will bring predators into the park; cats and magpies.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>	5126298		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	126	<b>Consultee</b> Friends of Southwick Country Park	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187466		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC71				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] The ecological importance of these sites has not been assessed. WHSAP does not recognise the ecological importance of the Lambrok. The Sustainability Appraisal of the sites at Church Lane, Upper Studley and Southwick Court suggests, without evidence, that development of these three sites will be an opportunity to enhance the biodiversity of the stream. All the evidence that we have, contradicts that suggestion; urbanisation will not improve the biodiversity of Lambrok Stream, it will pose a threat to it. WHSAP treats Lambrok Stream as a landscape feature; PC72 proposes that there will be social, environmental and economic advantages to the developments; PC 73 proposes that the flood plain of Lambrok Stream should be enhanced as a local amenity feature. The Lambrok has form and function in the landscape that will not be enhanced by residential development; the Lambrok is habitat for species that will not survive development. The use of trees and hedges as natural drainage attenuation will not slow drainage sufficiently to protect the stream from run-off from the steep slopes on its northern bank. Anything less than EA-approved constructed wetlands will result in pollutants reaching the stream. There has been no assessment of the complex ecological importance of Southwick Courts 16th Century moat, which the Lambrok flows through. It acts as a reservoir for the stream, and its biota, preventing the stream from drying up and offering refuge during periods of drought. It is probable that some of our species of Odonata breed there. There have been unsubstantiated suggestions that the moat harbours great crested newts (Triturus cristatus). An ecological assessment (pages13 &amp;14) carried out FPCR for Gladman Land (Planning Application No.17/03269/OUT) in an application to build on another part of Southwick Court, came to the conclusion there were no great crested newts but closer examination of the report shows that the moat and another nearby pond were not included in the analysis. We feel the importance of the green space between Southwick and Trowbridge cannot be over-emphasised. It is part of the wildlife corridor that runs south of the town connecting the woodlands to the east with the open farmland to its west. To close it will fragment habitat and limit the passage of wildlife in and out of Southwick Country Park.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018)</b>		

<b>document this representation relates to:</b>		<b>or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5126298		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	127	<b>Consultee</b> Friends of Southwick Country Park	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187466		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC72				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] The ecological importance of these sites has not been assessed. WHSAP does not recognise the ecological importance of the Lambrok. The Sustainability Appraisal of the sites at Church Lane, Upper Studley and Southwick Court suggests, without evidence, that development of these three sites will be an opportunity to enhance the biodiversity of the stream. All the evidence that we have, contradicts that suggestion; urbanisation will not improve the biodiversity of Lambrok Stream, it will pose a threat to it. WHSAP treats Lambrok Stream as a landscape feature; PC72 proposes that there will be social, environmental and economic advantages to the developments; PC 73 proposes that the flood plain of Lambrok Stream should be enhanced as a local amenity feature. The Lambrok has form and function in the landscape that will not be enhanced by residential development; the Lambrok is habitat for species that will not survive development. The use of trees and hedges as natural drainage attenuation will not slow drainage sufficiently to protect the stream from run-off from the steep slopes on its northern bank. Anything less than EA-approved constructed wetlands will result in pollutants reaching the stream. There has been no assessment of the complex ecological importance of Southwick Courts 16th Century moat, which the Lambrok flows through. It acts as a reservoir for the stream, and its biota, preventing the stream from drying up and offering refuge during periods of drought. It is probable that some of our species of Odonata breed there. There have been unsubstantiated suggestions that the moat harbours great crested newts (Triturus cristatus). An ecological assessment (pages13 &amp;14) carried out FPCR for Gladman Land (Planning Application No.17/03269/OUT) in an application to build on another part of Southwick Court, came to the conclusion there were no great crested newts but closer examination of the report shows that the moat and another nearby pond were not included in the analysis. We feel the importance of the green space between Southwick and Trowbridge cannot be over-emphasised. It is part of the wildlife corridor that runs south of the town connecting the woodlands to the east with the open farmland to its west. To close it will fragment habitat and limit the passage of wildlife in and out of Southwick Country Park.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018)</b>		

<b>document this representation relates to:</b>		<b>or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5126298		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	128	<b>Consultee</b> Friends of Southwick Country Park	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187466		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC73				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] The ecological importance of these sites has not been assessed. WHSAP does not recognise the ecological importance of the Lambrok. The Sustainability Appraisal of the sites at Church Lane, Upper Studley and Southwick Court suggests, without evidence, that development of these three sites will be an opportunity to enhance the biodiversity of the stream. All the evidence that we have, contradicts that suggestion; urbanisation will not improve the biodiversity of Lambrok Stream, it will pose a threat to it. WHSAP treats Lambrok Stream as a landscape feature; PC72 proposes that there will be social, environmental and economic advantages to the developments; PC 73 proposes that the flood plain of Lambrok Stream should be enhanced as a local amenity feature. The Lambrok has form and function in the landscape that will not be enhanced by residential development; the Lambrok is habitat for species that will not survive development. The use of trees and hedges as natural drainage attenuation will not slow drainage sufficiently to protect the stream from run-off from the steep slopes on its northern bank. Anything less than EA-approved constructed wetlands will result in pollutants reaching the stream. There has been no assessment of the complex ecological importance of Southwick Courts 16th Century moat, which the Lambrok flows through. It acts as a reservoir for the stream, and its biota, preventing the stream from drying up and offering refuge during periods of drought. It is probable that some of our species of Odonata breed there. There have been unsubstantiated suggestions that the moat harbours great crested newts (<i>Triturus cristatus</i>). An ecological assessment (pages 13 &amp; 14) carried out FPCR for Gladman Land (Planning Application No. 17/03269/OUT) in an application to build on another part of Southwick Court, came to the conclusion there were no great crested newts but closer examination of the report shows that the moat and another nearby pond were not included in the analysis. We feel the importance of the green space between Southwick and Trowbridge cannot be over-emphasised. It is part of the wildlife corridor that runs south of the town connecting the woodlands to the east with the open farmland to its west. To close it will fragment habitat and limit the passage of wildlife in and out of Southwick Country Park.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018)</b>		



<b>document this representation relates to:</b>		<b>or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5126298		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	129	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1129173	Associate RPS Group  <b>Person ID:</b> 1187476	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC67				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Q4 Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not. Change Reference Number: PC67 Amend the boundary of the allocation as set out in Annex E. And first sentence of paragraph 5.67 to read: Approximately 3.72 5.93 ha of land at Church Lane is allocated for the development of approximately 45 dwellings, as identified on the Policies Map." The proposed change to the site area is not considered sound unless there is also a change to the proposed quantum of development. For the reasons set out below, the wording of paragraph 5.67 should be amended to read: Approximately 5.93 ha of land at Church Lane is allocated for the development of a minimum of 45 dwellings, as identified on the Policies Map." Overall the proposed allocation at Church Lane is welcomed and an outline planning application for residential development was submitted to Wiltshire Council in October 2018. All matters aside from access have been reserved for subsequent approval. An indicative masterplan has been submitted with the application and this illustrates the site is capable of accommodating circa 65 homes. The application and the masterplan have been informed by a raft of technical reports, including a Design and Access Statement, Preliminary Landscape and Visual Appraisal, Transport Assessment, Flood Risk Assessment, Outline Drainage Strategy, Preliminary Ecological Appraisal including bat, badger and reptile surveys, a Built Heritage Assessment and an Archaeological Desk Based Assessment. As such, the constraints of the site are clearly understood by the site owner and the design team and the proposed figure of circa 65 dwellings is considered entirely appropriate and justifiable. Paragraph 117 of the NPPF stipulates that planning policies should promote an effective use of land in meeting the need for homes, while safeguarding and improving the environment. Furthermore, paragraph 122 makes it clear that planning policies should support development that makes efficient use of land. Paragraph 123 also requires that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. The resulting density from the parameters set down by the proposed changes to paragraph 5.67 would be 9.1 dwellings per hectare. Advocating such a low density is not consistent with the NPPF and would not reflect the development potential of the site. The arbitrary figure of 45 dwellings is not supported by any evidence from Wiltshire Council and in other supporting documents that feed into the Wiltshire Housing Sites Allocations Plan, the number of dwellings proposed has ranged from 45 up to 129, without any robust, consistent, evidence-based assessment of the sites opportunities and constraints: [TABLE - REFER TO ATTACHMENT] The Wiltshire Core Strategy seeks to deliver a minimum of 42,000 new homes across Wiltshire between 2006 and 2026, with at least 24,270 provided in the North and West Wiltshire Housing Market Area (NWWHMA). The most recent Housing Land Supply Statement (March 2018), highlights that the average annual</p>			

	<p>completions across the Plan period for the NWWHMA is currently 1,184 against an annual target of 1,237. Only 96% of the requirement has been met since 2006. If Wiltshire is to meet its minimum housing need, policies must seek to maximise densities, taking into account site specific factors. In the case of Church Lane, the significant technical work that has been undertaken provides confidence that the site could accommodate a higher quantum of development than currently envisaged, without detriment to ecological, landscape or heritage assets. Paragraph 5.67 should be amended to allow for upward flexibility and therefore a more appropriate density for the number of dwellings proposed. In its current form, paragraph 5.67 is considered to be unsound, in that it is not justified, or consistent with national planning policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	5126604		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	No, the Proposed Change does not meet a previous objection		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	Yes	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	Yes

<b>Comment ID:</b>	130	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC1				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC1 the term Devizes Community Area is deleted. The word Remainder should also be deleted.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5127061				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	131	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC2				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC2 - the term Malmsbury Community Area is deleted. The word Remainder should also be deleted.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5127061				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	132	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC3				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC3 we note that Table 4.1 has been updated through the PC which refers to Annex A, Table 4.1. We also note that for the North and West Wiltshire HMA the figures for Developable Commitments, 2017 2026 has reduced and the Minimum to be allocated figure has increased as set out in Annex A. The update is provided following the monitoring work that has been undertaken since the publication of the pre-submission draft Plan. The evidence to support the change is found at Topic Paper 3 Housing Land Supply Addendum (TOP/03C) and Topic Paper 4 Developing Plan Proposals TOP/04C). The Table is important as it sets out how many units are required to be delivered via the allocations in the three HMAs. Noting that Trowbridge and Warminster are the focus for allocations in this HMA (as set out at Table 4.2) then our previous views regarding the need to allocate sufficient land in the right places in and around Trowbridge are of relevance. In this respect, the commentary at para. 3.6 in Topic Paper 3 states that there have been delays in delivery at key principal settlements including Trowbridge. This reiterates the need to identify sufficient land that is actually going to deliver the minimum amount of homes needed for the town. At para. 3.8 we note the reference to the significant number of large site permissions granted in the 2017 monitoring year having bolstered supply. However there needs to be careful analysis of the ability of those sites to deliver development at the rates anticipated noting the updated guidance in both the NPPF and PPG in relation to this point. Tables 3.3 and 3.4 within the Topic Paper needs to be carefully assessed and reviewed accordingly to ensure that an adequate housing land supply can be demonstrated. The consequences of the housing land supply position for each HMA is set out in paras. 3.14 to 3.16 and, in relation to the North and West HMA we support the assertion (made at para. 3.15) regarding the need for additional allocations.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		



<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	133	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC4				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC4 delete the words aim to in order to provide certainty of delivery;				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>	5127061				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	134	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC32				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC32 we support the introduction of a word that allows for flexibility in delivery but as the housing requirement is a minimum then that should be reflected in the number of dwellings coming forward on each site. Therefore, the word Approximate should be deleted and Minimum inserted instead;				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5127061				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	135	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC13				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	136	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC15				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

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<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	137	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC17				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

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<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	138	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC21				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

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<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		



<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	139	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC22				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

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<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	140	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC23				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

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<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	141	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC24				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				



	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	142	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC26				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	143	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC55				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

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<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	144	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC56				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	145	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC57				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	146	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC58				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		



<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	147	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC59				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	148	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC60				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	149	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC61				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				



	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	150	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC62				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	151	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC63				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	152	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC64				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	153	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC65				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	154	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC66				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		



<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	155	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC67				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	156	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC68				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	157	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC69				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				



	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	158	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC70				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	159	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC71				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	160	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC72				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	161	<b>Consultee</b> WelbeckStrategic Lan II LLP	<b>Agent</b> Heynes Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138002	<b>Person ID:</b> 1138006	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC73				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] PC13, PC15, PC17, PC21, PC22, PC23, PC24, PC26, PC55 PC73 (inclusive) - the changes identified relate to the provision of development in the North and West HMA and Trowbridge. We do not, at this part of our representation, question any of the information put forward except in relation to the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In this respect our comments at PC3 regarding the definition of a truly deliverable site and its inclusion as a commitment needs to be carefully examined. The amendment to Table 4.7 confirms the latest position regarding housing land supply in relation to each individual HMA. Again, careful analysis is required of the commitments and windfall allowance in order to establish that those figures are robust. At PC25 a summary is provided of the six proposed allocations for Trowbridge in terms of the number of units that, collectively, those allocations can provide. The figure of 1,050 reflects the amended totals identified in PC13 for four of the proposed allocations. The Council/Inspector should be aware that we have not undertaken a rigorous assessment of each site. However, the changes proposed both in relation to the amount of housing now required to be allocated for Trowbridge and the increase in capacity highlights a number of concerns. First, the changes at PC25 and 26 explain that the shortfall in land supply is due to lack of delivery at Ashton Park (a strategic allocation in the Core Strategy) and notwithstanding the changes to the capacity of four of the allocations, housing development will fall short of the Core Strategy figure at an increased level (1,297 dwelling shortfall as opposed to 1,220 as originally identified). This demonstrates that the uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge. The Council is suggesting that Ashton Park will deliver 1,250 post 2026 but the Ashton Park allocation is required in total to assist with meeting the housing requirement of 6,810 units to 2026. That being the case, then the shortfall needs to be addressed with even greater urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units. The second point is that we note that the capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable if sufficient land that has the ability to properly deliver development is being made to accommodate the additional number of units or there has been a practical re-evaluation of densities. However, on the face of it, the increase in numbers suggests that the Council may be seeking to address the shortfall through squeezing units out of sites. There is, however, an alternative strategy and that is to deliver further unconstrained sites such as that which is being promoted by our Client. Land at Organpool Farm can deliver up to 100 units in a sustainable location when considering all of the site constraints. It is our view that to overlook this site as a potential housing allocation to contribute to meeting the needs of the HMA is shortsighted, particularly owing to its proximity to Trowbridge where the delivery of homes is being brought into question. The third point we wish to make is that it is noted that in</p>				

	<p>respect of some of the allocations additional criteria have been added in terms of matters to be addressed to ensure delivery. A number of the sites are in multiple ownership e.g. H2.1 now includes Council owned land. Clarification on whether this has been agreed for by the Councils Estate Dept. or relevant Dept. is advised. Furthermore, the delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the Council has addressed these matters through the submission of evidence to support the allocations. However, in our view there is a real danger that with there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge. It is our suggestion that the Council should identify further suitable sites so that they are futureproofing the Plan. If this does not happen then there is the potential for speculative planning applications to arise creating a situation where plan led growth will not occur. Therefore, as stated earlier, we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 35 of the NPPF. The modifications do not overcome our concerns as previously stated regarding the ability of the sites identified to make a real and genuine contribution to meeting the housing requirement identified in the Core Strategy. The strategy for delivery of housing in the Plan is not effective noting that there are reasonable alternatives that can deliver and the strategy has not been properly justified. We therefore object to the submitted Plan as proposed to be modified.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5127061</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	162	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1132344	Pegasus Planning Group  <b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC3				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>PC3 provides an update of Table 4.1 Housing Market Areas: Minimum to be allocated. As the Plan has already been submitted for Examination (on the basis of NPPF 2012) it is noted that for the purposes of Plan-making the housing land supply should be calculated in accordance with the NPPF 2012 (as recognised in paragraph 3.1 3.2 of Topic Paper 3 Housing Land Supply Addendum July 2018) according to paragraph 214 of NPPF 2018. However, for the purposes of development management (ie the consideration of planning applications) the new NPPF 2018 applies for the calculation of the housing land supply. Therefore as soon as the Plan is adopted the housing land supply will be different to that considered through the local plan examination. It is noted that Topic Paper 3 sets out the before position ie it excludes the proposed allocations. Table 3.4 of Topic Paper 3: Housing Land Supply Addendum identifies that the housing land supply position of the South Wiltshire HMA will decline rapidly unless the emerging allocations are found to be sound, which cannot be guaranteed. Even when the allocations are included in Topic Paper 4, Table 6.6, on the basis of the Councils assessment there is a only five year housing supply until the monitoring year of 2021. The amendments to Table 4.1 show that the minimum to be allocated has increased from 594 dwellings to 1,331 dwellings, reflecting the reduction in supply of approximately 1,058 dwellings. It is noted that the strategic allocation of Churchfields, Salisbury is no longer included in the supply as it is subject to significant delay and therefore is not included in the plan period to 2026. In addition we have questioned some of the commitments, eg 200 homes at the Central Car Park site (Salisbury). It is widely known that this site together with Churchfields have been long standing allocations (ref Wiltshire Core Strategy Core Policy 20). Similar to Churchfields, the Central Car Park is in commercial use with no evidence or application coming forward to indicate its deliverability within the plan period. Pegasus continue to object to the inclusion of the Central Car Park site of which 100 dwellings are anticipated on the site in the plan period. Including this site as part of the developable commitments is both misleading and contrary to paragraph 14 of the NPPF (2012), which states that local planning authorities should positively seek opportunities to meet the development needs of their area and should meet their objectively assessed needs. Furthermore, it is noted that paragraph 6.2 of Topic Paper 4 July 2018 states that there is uncertainty as to whether the full number of units allocated at the Kings Gate, Amesbury strategic allocation will be delivered. As a result there remains a residual requirement to be met in the South Wiltshire HMA and significant uncertainty over those sites that are included in the deliverable supply. The Councils response is to propose a new allocation of 14 dwellings at The Yard, Salisbury, rely on an delivery at Fugglestone Red (a site with planning permission) and the proposed allocation a</p>			

	Netherhampton Road, the anticipated delivery from these sites during the plan period is questioned. An objection is made to the deliverable supply this is addressed in detail in response to PC15 and PC17.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes



<b>Comment ID:</b>	163	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1132344	Pegasus Planning Group  <b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC4				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC4 is the changes proposed to paragraph 4.2 to clarify that the figures in Table 4.1 do not include windfalls. The proposed changes to Table 4.1 ( PC3) clearly show that the minimum to be allocated in the South Wiltshire HMA has increased by approximately 55%. Our objections to PC15 Table 4.7 have questioned the methodology for windfalls. An objection is made to the approach to windfalls which has deviated from the approach in the adopted Wiltshire Core Strategy. The approach in the Core Strategy was found sound, (but conservative) by the Inspector. The Council are now using an approach which gives a higher figure and are relying on a greater number of large windfall sites than found sound by the Inspector. In the adopted Core Strategy the Council relied upon Method 1 (as set out in the July 2014 HLSS) ie for South Wiltshire over 5 years the windfall allowance was 230 dwellings. The Council are now using Method 3 from the 2014 HLSS (now referred to as Method A) which generates 330 dwellings over the 5 years. However, the consistent application of Method 3 / Method A shows how the number of windfalls has decreased over time ie from 449 dwellings over 5 years to 330 dwellings over 5 years. This shows windfalls are declining and yet the Council persist with a method which is totally reliant on historic trends of windfalls. The Council are also allocating sites, therefore the capacity is reduced for windfalls as these sites will come forward as allocations. This would suggest that the number of windfalls will be below the declining historic trend. It is considered that going forward, for the remaining plan period that there is an over reliance on windfalls in the South Wiltshire HMA.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>No, the Proposed Change does not meet a previous objection</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	164	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1132344	Pegasus Planning Group  <b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC15				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>PC15 provides an update to Table 4.7 HMA housing land supply to reflect the latest housing land supply statement. The latest assessment of the developable supply which is available is contained in the Wiltshire Housing Land Supply Statement Update March 2018 (HLSS) with a base date of April 2017. The Councils latest evidence indicates that from April 2018 the Council are unable to demonstrate a five-year land supply against the adopted requirement without the emerging allocations, this is based on NPPF 2012 which allows a far more permissive definition of a deliverable site. Whilst this is acceptable as the Plan was submitted under the transition arrangements, once the Plan is adopted the assessment of housing land supply will be subject to the new NPPF 2018 and the housing delivery test (the latter is to be published in November 2018). NPPF 2018 fundamentally changes the assessment of deliverable supply, such that certain sources of supply should only be considered deliverable where the Council provides clear evidence that the first completions will be achieved within five-years. We have undertaken an assessment of the deliverable supply in accordance with NPPF 2012 and conclude that the Council is only able to demonstrate a deliverable supply of 2,593 homes, which equates to a 4.20 year land supply rather than the figure of 5.7 years supply as suggested in amendments to Table 4.8 (PC17). Given the figures in the adopted Wiltshire Core strategy are a minimum housing requirement and given that the housing land supply as currently calculated is fragile towards the end of the plan period, and furthermore given the delay in the preparation of the Wiltshire Core Strategy (it cannot be relied upon to address the shortfall) it is considered that a contingency should be included for the South Wiltshire Housing Market Area. Land to the north of Old Sarum has been submitted to the Council, indeed this area (Longhedge) along with land at Netherhampton was recognised in paragraph 5.112 of the Wiltshire Core Strategy ( adopted January 2015) as:- broad areas of search for future development around Salisbury are mapped in Topic Paper 19 (see map Potential Areas for Strategic Growth in and around Salisbury/Wilton ) 45. If further land is required in the future, sites at Netherhampton and additional growth at Longhedge should be considered as part of the councils ongoing monitoring process. An objection has already been made to Policy H3.1 the inclusion of land at Nerthhamton Road for 640 dwellings and questioned the deliverability of the site in the plan period. It is noted that whilst in the Housing Site Allocations Plan, land at Netherhampton Road, Salisbury is proposed in the Plan for 640 dwellings, however, according to the HLSS March 2018, only 520 are envisage to be delivered in the plan period and this is assuming a start date of 2021/22 with 40 dwellings in that year and thereafter 120 dwellings per annum. Evidence Windfalls In our reps to PC4 we have questioned the windfall figure. As can be seen from page 113 of the Housing Land Supply Statement, the number of windfall completions and permissions is highly variable (ranging between circa 40 and 170 dwellings per annum in South Wiltshire). This is as a result of the influence of occasional large site windfalls which cause significant variation from the broadly</p>			

consistent level of delivery of small site windfalls. The Council now simply assume that the historic average rates persist without evidence that there is the capacity to sustain previous rates of large site windfall delivery. This means that exceptional windfall permissions (which will not be replicated) become embedded in the trends which the Council relies upon in the future, even if there are no similarly sized potential sites which could replicate that which has occurred. Such an approach cannot be sound. Saved Local Plan Allocations The Council continue to rely upon the delivery of saved Local Plan allocations in the Table 4.7. Appendix 1 of the HLSS, March 2018 although the number of sites and the contribution from those sites has reduced significantly as the Council have acknowledged that the Churchfield site will not come forward until beyond the plan period. There are still some saved local plan sites that are included: The saved local plan allocations from the South Wiltshire Local Plan are: Bulbridge {45 dwellings} Salisbury District LP 2003 and carried forward to South Wiltshire Core Strategy (adopted 2012). Bulbridge this site is a saved allocation from the Salisbury District Local Plan which was adopted in June 2003. In the intervening 15 years, no planning application has been received for the development of this site. This record alone indicates that there is no realistic prospect of delivery according to the PPG (3-020). This site is not subject to any planning application. Oldstock hospital {45 dwellings} this sites also dates from the Salisbury District Local Plan and is not envisaged to delivery until 2022/23, some 20 years later from when it was allocated. Old Manor Hospital {9 dwellings} Salisbury District LP 2003 and carried forward to South Wiltshire Core Strategy (adopted 2012). It was allocated for 80 dwellings. A full planning permission has been granted for 71 dwellings (15/09465/FUL) and the remainder of the allocated area has gained permission or been built for alternative uses (including care homes and a primary healthcare facility). There is therefore no remaining capacity for the residual 9 dwellings to be built. However, the Council include these remaining 9 dwellings for which there is no capacity, and which is not the subject of detailed consent within their deliverable supply. It can be concluded that these sites were allocated in June 2003 and saved again in February 2012. In the intervening years these sites have not delivered and as such they are unlikely to provide a reliable source of supply in the future. Proposed Allocations It is evident from the HLSS March 2018 that the allocations comprise 173 dwellings of the deliverable supply for 2017-2022. Due to the reliance on one large site and commitments, the housing land supply deteriorates towards 2022/23. (Table 4.8 PC 17). Housing Land Supply There is a difference in the deliverable housing land supply from that set out in the Housing Land Supply Statement published March 2018 (base date April 2017). Table 2 states that the deliverable supply 2017 2022 for South Wiltshire is 3,173 dwellings (this corresponds with Appendix 4 of the HLSS) however, when compared to Table 6.5 in Topic Paper 4 July 2018, the figure for the deliverable supply is 3,187 dwellings. The difference being 14 dwellings which is the proposed allocation: The Yard, Salisbury. For reasons set out above, eg question the reliance on windfalls, the saved allocations and the deliverability of some of the proposed allocations, we do not believe the housing supply as set out in Topic Paper 4. There remains no up-to-date housing trajectory to support the Proposed Changes.

**Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:**

**Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).**

**Please state which evidence document this representation relates to:**

**Please give details of why you support or do not support the updates to the associated evidence documents.**

<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	165	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1132344	Pegasus Planning Group  <b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC16				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC16 refers to paragraph 4.32 which is proposed to be updated to reflect the HLSS March 2018. The amended text states that for the supply exceeds the five year requirement through to the end of the plan period for all years except for four in South Wiltshire HMA, and then states that by then additional allocations will be included within the review of the Wiltshire Core Strategy. However, the Wiltshire Core Strategy is significantly delayed. It is over twelve months since there was a consultation on the scoping of the Core Strategy Review and no further consultation is envisaged until the latter part of 2019. Consequently, the Site Allocations Plan will not be able to rely upon the Wiltshire Core Strategy to address the housing shortfall later in the plan period. Even based on the Councils assessment of housing land supply, the position deteriorates in 2019/2020 onwards so that by 2022/23 the housing land supply is vulnerable being only 5.14 years (PC17 Table 4.8). In order to ensure that there is a five year housing land supply it is considered that a contingency site needs to be included in the plan ie land north of the Portway, Old Sarum which has previously been identified in the Wiltshire Core Strategy as an area suitable for additional growth.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	166	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1132344	Pegasus Planning Group  <b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC17				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>PC 17 relates to Table 4.8 HMA Five Year Housing Land Supply. Topic Paper 4 paragraph 6.6 acknowledges that a 5 year housing land supply with a 5% buffer can only be demonstrated until 2021 and this is calculated on the basis of NPPF 2012 which takes a more permissive approach to assessing deliverable sites. We have already made the point in representations to PC4 that once the Local Plan is adopted the method for the calculation of housing land supply will change and therefore the position is not as robust as set out in Topic Paper 4 July 2018. Therefore it is considered that the Plan should include a contingency site ie land north of the Portway, Old Sarum which is in the Longhedge area which was acknowledged in the Adopted Wiltshire Core Strategy as if further land is required in the future, sites at Netherhampton and additional growth at Longhedge should be considered as part of the councils ongoing monitoring process. (paragraph 5.112). Land at Netherhampton Road is proposed in the Site Allocations Plan, but the allocation of 640 dwellings is not deliverable in the Plan period to 2026 ( approximately 120 dwellings are envisaged post 2026). This is set out in the Councils evidence base the HLASS published March 2018. Pegasus has already submitted detailed objections on behalf of Dolphin Farms Ltd in September 2017 objecting to the Netherhampton Road site (Policy H3.1) and promoting land north of the Portway, Old Sarum which has been assessed in the preparation of the Housing Site Allocations Plan. We have objected to the Sustainability Appraisal of the site and provided evidence to support our objections when we responded to the consultation on the Plan in September 2017. Our previous representations set out that land north of the Portway (SHLAA site S80) should be considered as a more sustainable location for growth that can be delivered in the plan period, which would contribute to some of the housing provision on which Policy H.3 is reliant and also in recognition that the housing land supply deteriorates through the plan period. The land to the north of the Portway is well placed to accommodate growth in order to meet local housing needs and help sustain the new community at Old Sarum/Longhedge. We have outlined in our previous representations that over a period of 10 years or so, the Local Planning Authority has developed a strategy which has focussed development on Old Sarum, with the objective of creating a new community with a high level of self containment whilst having good public transport links to the city centre. SHLAA site S80 is well located in relation to the mixed use developments at both sites. The south western boundary adjoins the northern phases of housing with the Old Sarum development, including an area of parkland along approximately half of the boundary. Its north western boundary adjoins the Longhedge development albeit that the adjoining area is also proposed for parkland. Site 690 and the Longhedge are both contained by the Monarchs Way bridleway. The land is well related to the existing development with direct access to the highway network and in single ownership. The land is available and a number of technical studies have been undertaken to inform</p>			



	the masterplanning of the site. These were submitted to the Council in September 2017 to support our representations on the Site Allocations Draft Plan.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	167	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1132344	Pegasus Planning Group  <b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC27				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>PC27 provides an update to Table 4.11 South Wiltshire HMA - distribution of housing development 2006-2026. It is noted that the developable commitments includes the proposed allocations. The developable commitments has reduced from 3,833 dwellings to 2,970 dwellings, it is considered that this figure should be reduced further to reflect the uncertainties surrounding the central car park site (even though only 100 dwellings is included in the plan period at this site) and also to acknowledged the uncertainties in relation to the delivery of housing at Kings Gate, Amesbury (paragraph 6.3 Topic Paper 4 July 2018). Based on the Councils figures the developable commitments excluding proposed allocations for Salisbury and Wilton are 2,226 (Table 2.3 Community Topic Area Paper Salisbury July 2018), allocations comprise: Netherhampton Road reduced in the HLSS for the plan period to delivery 540 dwellings ( allocated for 620 dwellings) Hilltop Way 10 dwellings North of Netherhampton Road 100 dwellings Land at Rowbarrow 100 dwellings The Yard 14 dwellings The total allocations proposed to delivery in the plan period is 744 dwellings. Compared with the residual requirement of 866 for Salisbury and Wilton (Table 2.3 of the Community Topic Paper July 2018 referred to above), leaving a shortfall which is to be met by windfalls in Salisbury and Wilton. We have critised the assumptions for the windfall figure in our response to PC4. In view of our objections to the Housing Land Supply and our objections to the allocation of Netherhampton Road ( the latter is set out in detail in response to the Draft Plan in September 2017) it is considered that the developable commitments (which includes proposed allocations) should be increased to reflect the fact the overall housing requirement is a minimum (indicative housing requirement and is therefore not a ceiling figure). The Council based on their own figures acknowledge that the surplus amount possible over the indicative requirement for the plan eriod is modest even at face value . In view of the above there should be a contingency site included in order to support/maintain the five year housing land supply and housing delivery across the plan period and support the role of Salisbury as the Principal Settlement and focus for development in the HMA.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<b>document this representation relates to:</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	168	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1132344	Pegasus Planning Group  <b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC29				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>PC29 amends paragraph 4.64 to the effect that two allocations of over 500 dwellings provide a large source of supply . However, one of the allocations was included in the Wiltshire Core Strategy ie Fuggleston Red and has planning permission and is continuing to be developed. The other allocation is a proposed allocation at Netherhampton Road. The reliance on these two sites is significant. Of the proposed allocations in the Salisbury Community Area ie 850 dwellings, the plan proposes 74% on one site at Netherhampton Road (Policy H3.1), which is not envisaged to commence delivery until 2021/22 and then only 40 dwellings are anticipated. Thereafter, 120 dwellings are expected with the site continuing to delivery post 2026 beyond the plan period. We have in our response to Policy H3.1 of the Draft Plan in September 2017 objected to the site and outlined our major concerns in respect of traffic, landscape, water supply and deliverability. The proposed changes do not provide any further information to support the proposed allocation of land at Netherhampton Road, (Site 1208) Policy H3.1. There is no evidence to indicate that the development could come forward by overcoming the very real constraints and develop a comprehensive mixed use strategy within the plan period. Furthermore, it is noted that both sites ie land to the north of Netherhampton Road (Policy H3.3) and land at Netherhampton Road (Policy H3.1) comprising proposed allocations of 640 dwellings and 100 dwellings respectively are in the control of the same developer Bovis Homes. The HLSS ( March 2018) indicates that both sites will start to deliver with 40 dwellings each in 2021/22 and then the following year 120 dwellings are expected from land at Netherhampton Road and 60 dwellings from land north of Netherhampton Road, ie 180 dwellings from Bovis Homes in a year. Even on the basis of the Councils own evidence for a forthcoming inquiry the average that has been achieved on one site is 117 dwellings ( on land North, West and South of Bishopdown Farm - Barratt David Wilson). We remain of the view that the approach taken in the Housing Site Allcoations Plan to allocate 74% of the Salisbury housing allocations in one location, with many unknown and unresolved issues, risks a significant housing shortage in Salisbury within the plan period. By limiting the potential housing supply to one large site in Salisbury, the plan conflicts with paragraph 14 of the NPPF which states that: Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to prapid change. Should sites S1028 and S1027 fail to deliver within the plan period, the Plan as currently proposed does not allow for sufficient flexibility for an alternative, deliverable site to come forward in accordance with policy. It is considered that the Plan should address this issue and a contingency site at land north of the Portway, Old Sarum should be included in the Plan, this site should be allocated and can then support the five year housing land supply.</p>			

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	169	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1132344	Pegasus Planning Group <b>Person ID:</b> 397761	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC31				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC31 amends paragraph 4.68 to reflect that the intention is that Fuggleston Red (instead of Churchfields) and the Netherhampton Road site will deliver new homes alongside each other towards the end of the plan period. For reasons set out in response to the Proposed Changes this is not considered to be a robust and effective strategy as the anticipated delivery per year from these sites is questionable. I refer to our previous representations on Policy H3.1 which questioned the delivery from the Netherhampton Road site and also reference was made a report into the delivery of urban extensions on behalf of Gladman Developments Limited in 2014 and the also the Savills study on behalf of Barratt Homes in 2014. Nathaniel Lichfield and Partners produced a report 'Start to Finish' in November 2016 which also illustrates the long lead in times for large sites, that on average it took 3.9 years lead in time for large sites prior to the submission of the first planning application. Pegasus remain concerned that the sites that the Council rely upon will not delivery as set out in the housing trajectory.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	170	<b>Consultee</b> Hallam Land Management/Velcourt Limited	<b>Agent</b> <b>Person ID:</b> 1013209	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1146294		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC99				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Hallam Land Management Limited (HLM) and Velcourt Limited object to PC99 on the basis that development encroaching above the 70 metre contour would have an adverse effect on the approach and landscape setting of Salisbury along Netherhampton Road. In addition to the landscape and setting concerns HLM and Velcourt raised at the Regulation 19 stage in their objection to Policy H3.1, the ability for built development to encroach above the 70 metre contour would fail to have full regard to the Stage 4a Site Landscape Assessment whereby the Capacity to Accommodate Change is Low and both the Magnitude of Effect on Landscape Character and Views are High Adverse. There is limited, if any, logic to potentially increasing these visual and landscape adverse effects by pushing built development further up the slope. HLM and Velcourt also find it somewhat curious that there are no comments similar to PC104 concerning the historic setting of Salisbury.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	171	<b>Consultee</b> Hallam Land Management/Velcourt Limited	<b>Agent</b> <b>Person ID:</b> 1013209	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1146294		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>		PC104			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>PC104 highlights the concerns raised by Hallam Land Management Limited (HLM) and Velcourt Limited to the suitability and appropriateness of allocating land north of Netherhampton Road for housing development (Policy H3.3). By reason of the sensitivity of this site for the setting of historic Salisbury, the heritage assessment should already have been undertaken to determine what the capacity of the land might be to accommodate development (if at all). Indeed, the Heritage Impact Assessment (HIA - March 2018) has been published post the Regulation 19 version of the Local Plan rather than informing decisions about the principle and suitability of land to include in the Local Plan as allocations. HLM and Velcourt consider that the belated preparation of the HIA is seeking to justify the allocation after a decision has been taken rather than informing the assessment process. The HIA identifies the following which indicate the very real and significant harm development on land north of Netherhampton Road would cause to important heritage assets: Historic Setting of Salisbury and the Cathedral The nature, scale (particularly height and massing) and location of any development proposed on the site will be critical in determining precise levels of impact. Nevertheless, it is likely that harm will occur as a consequence, interacting with the aesthetic value of the Cathedral and potentially reducing the ability to appreciate the asset (and Salisbury) in its rural landscape and topographical setting. The communal values of the asset may also be affected, although the extent to which the view is valued by the public is not clear. With regard to the Conservation Area, impact on this strategic view could be held to directly conflict with the requirements of the Conservation Area Appraisal. Taking a precautionary approach, it is likely that the effect would be at least medium-high given the importance of the asset and the sensitivity of this element of its setting to change. (paragraph 9.19) It is unlikely that the effects of development could be entirely avoided or satisfactorily mitigated with regard to impacts on strategic views. Development would therefore be very likely to conflict with the requirement to conserve strategic views set out in the City of Salisbury Conservation Area Appraisal and Management Plan (2014). (paragraph 9.24) Archaeological Matters While the significance of the on-site archaeological assets is not anticipated to be of an order likely to completely constrain development, the presence of at least regionally significant later prehistoric industrial activity in close association with putative settlement suggests that a precautionary approach is advisable. (paragraph 9.21) These issues go to the very heart of the soundness of the proposed allocation and, if it were to be retained, what is this sites real capacity is to accommodate built development without causing the significant harm to designated heritage assets as identified in the HIA. For these reasons, HLM and Velcourt object to the inadequacy of PC104 to address the real heritage concerns associated with the land north of Netherhampton Road.</p>			

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	172	<b>Consultee</b> Hallam Land Management/Velcourt Limited	<b>Agent</b> <b>Person ID:</b> 1013209	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1146294		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC105				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC105 highlights the concerns raised by Hallam Land Management Limited (HLM) and Velcourt Limited to the suitability and appropriateness of allocating land north of Netherhampton Road for housing development (Policy H3.3). By reason of the acknowledged sensitivity of this site for the setting of Salisbury, the detailed landscape assessment should already have been undertaken to determine what the capacity of the land might be to accommodate development. This issue goes to the very heart of the soundness of the proposed allocation and, if it were to be retained, what its real capacity is to accommodate built development. For these reasons, HLM and Velcourt object to the inadequacy of PC105 to address the real landscape and visual impact concerns associated with the land north of Netherhampton Road.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	173	<b>Consultee</b> Hallam Land Management/Velcourt Limited	<b>Agent</b> <b>Person ID:</b> 1013209	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1146294		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC109				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Hallam Land Management Limited and Velcourt Limited objected to the principle of the Rowbarrow housing allocation (Policy H3.4) and PC109 confirms the concerns raised relating to landscape and ecological matters are important material considerations. There remains no clear evidence that this allocation can address these matters notwithstanding PC109. Even if the allocation is retained, then what is the realistic capacity?				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	174	<b>Consultee</b> Hallam Land Management/Velcourt Limited	<b>Agent</b> <b>Person ID:</b> 1013209	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1146294		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC110				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC110 Hallam Land Management Limited and Velcourt Limited objected to the principle of the Rowbarrow housing allocation (Policy H3.4) and PC110 confirms the concerns raised relating to heritage matters are clear material considerations, specifically the impact on a designated heritage asset of national importance. There remains no clear evidence that development could occur within the allocation without significant detriment to the setting of the Scheduled Ancient Monument notwithstanding PC110. Even if the allocation is retained, then what is the realistic capacity? Given the recognised heritage constraint, it is unfathomable why the Heritage Impact Assessment (HIA March 2018) does not include any assessment of the proposed Rowbarrow allocation. This comment is made notwithstanding the fact that the HIA appears to have been prepared after the Council made the decision to include this allocation in the Local Plan. HLM and Velcourt consider that the belated preparation of the HIA is seeking to justify the allocation after a decision has been taken rather than informing the assessment process. For these reasons, HLM and Velcourt object to the inadequacy of PC110 to address the real and significant heritage concerns associated with Rowbarrow.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			



<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>No, the Proposed Change does not meet a previous objection</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	175	<b>Consultee</b> Director Evil Panda Ltd	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187326		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified	
<b>Identify Proposed Change Reference Number</b>	N/A [General]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I am writing on behalf of Evil Panda Ltd to object to the Wiltshire Housing Site Allocations Plan on the basis of Soundness (and justification)				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	176	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187846	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposal to remove the Ridgeway Farm site from the Wiltshire Housing Site Allocation Plan on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" to meet local needs. Further development of the Ridgeway Site would lead to even greater traffic flows down what is already a very busy road without continuous pavements to the Village Hall. It is already dangerous for mums with youngchildren who walk this way to the local village pre-school As a young person, I decided to get involved with the Neighbourhood Plan and assisted on one of their Focus Groups and it is my belief that it is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), is very well supported by the community and is planning to not only allocate land to meet identified needs but to also make provision for the younger generations in any new development. The Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	177	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>		N/A [General]			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>On behalf of the CCG I have had look at the latest planning website information as suggested and the following is the CCG's position. Clearly there is a lot of information contained in the latest Council submission which runs to hundreds of detailed documents. However the headlines I have gleaned are:- The housing numbers are constantly under review by Wilts Council. Market conditions affect deliverability and we seem to be seeing a cooling of the market. Some of the more rural areas have already met their allocation up to 2026. There is some fairly minor tweaking of settlement boundaries to reflect what has actually been built on the ground since the last plan and to reflect natural / logical boundaries. The pace of delivery for Trowbridge is a big problem due to not meeting certain environmental and ecology requirements. Salisbury is also a problem because a certain large, fairly central site has not come forward quickly enough. The growth areas are concentrated in the larger urban areas particularly Trowbridge (2000), Salisbury (3000) and Chippenham (2000) (figures in brackets approx. residual numbers i.e. still to be built). Also we have seen draft projections for the plan period up to 2036 that increase all of these numbers, particularly for (in order of magnitude highest to lowest) Melksham, Trowbridge, Chippenham and Devizes. Generally the CCG are not in the position of objecting to new housing, but we do need to keep making the point that, when the L.P.A. grants permission for housing, this has a direct effect on the provision of health care in the area affected by that new housing. It is easiest to demonstrate a direct correlation with primary care, but where it becomes more difficult is to make a case for other NHS providers (such as secondary care, acute, ambulance service etc.) but this is not to say those organisations should not also have the opportunity to comment and make representations. Due to the potential enormous uplift in values of land with planning consent there should be enough money in the planning system to support an element of primary care development, in particular for GP premises, which is easiest to quantify. The CCG is aware that it has a challenge of getting health up the agenda in order to join traditional Council financed services, such as highways and schools which, as we are aware, are also under pressure. The NHS also has the challenge of arguing a case against housing developers / landowners and their agents, even though those same developers seem more accepting of the need to pay for local schools and highways works etc. Our experience is that where a good case is made and the local planning officer is supportive the chances of a successful NHS bid increase. The main challenge for the CCG is following these things through, which can take years to come to fruition. Funds normally flow through to the Local Authority (e.g. on the construction of the 100 th house) not automatically to the NHS, so again this needs to be monitored and a case made to secure those funds. The CCG then will have the responsibility to ensure the money is spent as originally indicated, otherwise the developer/ landowner can expect to be paid back if they are not used as agreed and within a specified timescale. Therefore the timing of any receipt and expenditure by the CCG via a practice</p>				

	development becomes key. To summarise the CCG do not object to the proposed housing as such in the draft Allocations Plan but wish to be fully consulted on the plan as it proceeds and on any applications for housing of, say above 50 dwellings, in order that a case can be made for financial support via S106 or CIL where appropriate and look to the LPA to support those bids.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

Comment ID:	178	<b>Consultee</b> <b>Person ID:</b> 704997	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
				<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>		PC94			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively Prepared: NO - Development requirements have been overprovisioned in the Westbury Community Area by 245 houses. No further allocations are required Justified; NO - The Site 738 and 321 developments are non-compliant with the Core Strategy Policy 1, Clause 1.15. i.e. "Small housing sites are defined as sites involving fewer than 10 dwellings". The Council's assessment of Bratton as a "Large Village" is flawed and incorrect, in essence, over counting the number of recreation and sports fields. The development of both sites has been assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households with an increase of 26 houses in the following 10 years. Therefore a further 40 houses will increase the proposed 15 year growth to 12.9% Neither development complies with the EXAM/02A (WHSAP Sustainability Appraisal Sept 2018). Housing allocations should match employment opportunities to reduce out-migration for work and developments should be located in close proximity to employment site to reduce commuting. Clearly Bratton does not comply with this definition. The increase in cars per household, normally an average of 2 per dwelling, will increase traffic flows, noise and pollution. Traffic has doubled through Bratton in the last 3 years. The previous applications for these sites was rejected on the unsuitability of the entrances for the sites as they were considered dangerous to traffic on the main road due to poor visibility for pedestrians and drivers. Additionally, There is little opportunity for bicycle lanes either side of highway. What has changed to make these entrances less dangerous? Developments of this size will add to the pressures the Bratton school and on the NHS, in particular, Bratton Surgery. Already the White Horse Surgery in Westbury is exceeding capacity due to the vast housing estates being built in Westbury and Doctor's appointment have to be made up to 3 weeks in advance. Loss of green space and agricultural land Effective: NO - Large developments in a village the size of Bratton are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with National Policy: NO - Large scale housing developments in "Large Villages" are not promoted by National Policy. Additional Comments: My concern with this proposal is that the developers have already applied for 57 houses on these two sites which exceeds the total (44) required by the community by 13 more houses. The danger here is that there is no doubt that they will try to shoe-horn in more houses as building commences, as they did in Rosenheim Rise (numbers 5 and 7) and in Manor Fields Estate. The proposed estate entrances on the B3098 have already been considered as dangerous and unacceptable and it would be difficult to make any improvements to the road to make any difference to the safety of other road users.</p>			



<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	179	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [SBR]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>My name is [REDACTED]. My wife [REDACTED] and I have owned and lived at Mount Pleasant, Quarry Hill, Box, Corsham, Wiltshire S13 8LP since July 1976. Yesterday evening a neighbour pointed out to us that our garden is not included in the current settlement boundary on the Box Plan included in the Corsham Community Area Topic Paper. This morning we got in touch with [REDACTED], Senior Planning Officer at Wiltshire Council, who assisted us in finding the map online. The map outlines the villages Settlement Boundaries suggested (?) in 2015, 2017 and 2018. To our surprise our garden is excluded from them all. Our curtilage extends into J5, J6, K5 and K6. We are surprised to find the black and red boundary line obliterates our house, but that may be from a conflict of scales. What is evidently clear from its omission is our triple garage located in K5 for which the preceding Planning Authority gave us planning permission somewhen early on in our ownership. In the forty-two plus years we have lived here we have supported applications for and seen houses built in divided gardens on the other side of Quarry Hill. We have always assumed that some of our large garden could likewise be given up for much needed housing. The exclusion of our garden from sequential boundary delineations seems most arbitrary. After studying the detail of the published plan, we can find no other example in the village where a long established curtilage has been cut off from its dwelling house. As the subject of your examination is in part to judge on the sufficiency of available housing sites within proposed boundaries, we would ask that you could eliminate a patent boundary anomaly that limits further the very limited housing options within our village.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	180	<b>Consultee</b> Town Clerk Trowbridge Town Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 391073		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC51				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Trowbridge Town Council responds to the consultation on the Proposed Changes to the Housing Sites Allocation Plan of Wiltshire Council as follows: Trowbridge Town Council does not support the proposed allocation at Southwick Court nor the following sites, all of which are contrary to the Wiltshire Core Strategy: H2.3 Elizabeth Way 355 H 2.2 Land off the A363 at White Horse Business Park 175 And is equally opposed to the increased allocation at the above two sites as per the Proposed Changes PC51, PC55 and PC60. The Wiltshire Core Strategy says at paragraph 5.150 page 181. "it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning" Trowbridge Town Council agrees that open countryside should be maintained and contends that the now proposed strategic landscape buffer between Trowbridge and the village of North Bradley (PC60) will fail to maintain open countryside and is therefore unsound.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>No, the Proposed Change does not meet a previous objection</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	181	<b>Consultee</b> Town Clerk Trowbridge Town Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 391073		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC55				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Trowbridge Town Council responds to the consultation on the Proposed Changes to the Housing Sites Allocation Plan of Wiltshire Council as follows: Trowbridge Town Council does not support the proposed allocation at Southwick Court nor the following sites, all of which are contrary to the Wiltshire Core Strategy: H2.3 Elizabeth Way 355 H 2.2 Land off the A363 at White Horse Business Park 175 And is equally opposed to the increased allocation at the above two sites as per the Proposed Changes PC51, PC55 and PC60. The Wiltshire Core Strategy says at paragraph 5.150 page 181. "it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning" Trowbridge Town Council agrees that open countryside should be maintained and contends that the now proposed strategic landscape buffer between Trowbridge and the village of North Bradley (PC60) will fail to maintain open countryside and is therefore unsound.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>No, the Proposed Change does not meet a previous objection</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	182	<b>Consultee</b> Town Clerk Trowbridge Town Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 391073		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC60				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Trowbridge Town Council responds to the consultation on the Proposed Changes to the Housing Sites Allocation Plan of Wiltshire Council as follows: Trowbridge Town Council does not support the proposed allocation at Southwick Court nor the following sites, all of which are contrary to the Wiltshire Core Strategy: H2.3 Elizabeth Way 355 H 2.2 Land off the A363 at White Horse Business Park 175 And is equally opposed to the increased allocation at the above two sites as per the Proposed Changes PC51, PC55 and PC60. The Wiltshire Core Strategy says at paragraph 5.150 page 181. "it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning" Trowbridge Town Council agrees that open countryside should be maintained and contends that the now proposed strategic landscape buffer between Trowbridge and the village of North Bradley (PC60) will fail to maintain open countryside and is therefore unsound.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		



<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>No, the Proposed Change does not meet a previous objection</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	183	<b>Consultee</b> Asset Manager South West Highways Agency	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 903251		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC74				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>WILTSHIRE COUNCIL WILTSHIRE HOUSING SITE ALLOCATION PLAN SCHEDULE OF PROPOSED CHANGES - CONSULTATION</p> <p>OCTOBER 2018 Highways England welcomes the opportunity to comment on the Schedule of proposed changes to the emerging Wiltshire Housing Site Allocation Plan (WHSAP). As you are aware Highways England is responsible for operating, maintaining and improving the Strategic Road Network (SRN) to support its primary function - that is the safe and efficient movement of people and goods, alongside its long term integrity. In the Plan area, the SRN comprises parts of the M4 and A36. In recognition of our responsibilities, the following comments are made. Highways England previously provided a formal consultation response dated 21 September 2017 for the pre submission draft of the WHSAP. A further consultation response was provided dated 29 March 2018 in relation to proposed additional housing sites. While this response addresses further changes, the same policy requirements set out in the letter dated 21 September 2017 continue to apply to the WHSAP and the new sites identified. Matters arising from the Schedule of proposed modifications of the Plan It is noted that there are an 250 additional dwellings proposed in Trowbridge across 4 site allocations which were previously assessed by Highways England. Furthermore, all site allocations within Market Lavington (80 dwellings) and Crudwell (50 dwellings) have been omitted from the Plan. Strategic Road Network (A36) updated references; PC74 Warminster Updated to include a reference that new developments are required to address any direct or indirect cumulative impact on the A36. PC100 Update provided to highlight that a refresh of the Salisbury Transport Strategy has taken place in dialogue with Highways England. PC106 Netherhampton Updated to highlight that Transport Assessment is necessary, in addition to the provision of network improvements in conjunction with development proposals Highways England welcomes these updates to the WHSAP which strengthen the requirement for proposals to be supported by appropriate transport assessment and mitigation necessary to ensure that impact on the SRN is not severe. Salisbury Transport Strategy (STS) and A36 Southampton Road Study Highways England has worked collaboratively with Wiltshire Council to refresh the Salisbury Transport Strategy which sets out a package of high-level highways and transport interventions to improve accessibility and support growth and development across the city. In parallel to the STS refresh and recognising particular constraints at A36 Southampton Road, Highways England is progressing a study to identify potential options to improve the existing performance and operation of this link and to help to facilitate growth aspirations across the City. Highways England is working closely with Wiltshire County Council in the development of this study, which will dovetail with the Salisbury Transport Strategy. The study is due to conclude in early 2019. Both highway authorities recognise the challenges of the existing and predicted situations resulting from growth along the A36T through Salisbury. Highways England welcome the opportunity to continue to work with the Council to further develop a joint understanding of the issues, problems and</p>				

	limitations of the existing network, and thus work towards the identification of interventions that will enable the safe accommodation of growth whilst also delivering improvements to journey times and journey reliability.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	184	<b>Consultee</b> Asset Manager South West Highways Agency	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 903251		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC100				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>WILTSHIRE COUNCIL WILTSHIRE HOUSING SITE ALLOCATION PLAN SCHEDULE OF PROPOSED CHANGES - CONSULTATION OCTOBER 2018</p> <p>Highways England welcomes the opportunity to comment on the Schedule of proposed changes to the emerging Wiltshire Housing Site Allocation Plan (WHSAP). As you are aware Highways England is responsible for operating, maintaining and improving the Strategic Road Network (SRN) to support its primary function - that is the safe and efficient movement of people and goods, alongside its long term integrity. In the Plan area, the SRN comprises parts of the M4 and A36. In recognition of our responsibilities, the following comments are made. Highways England previously provided a formal consultation response dated 21 September 2017 for the pre submission draft of the WHSAP. A further consultation response was provided dated 29 March 2018 in relation to proposed additional housing sites. While this response addresses further changes, the same policy requirements set out in the letter dated 21 September 2017 continue to apply to the WHSAP and the new sites identified. Matters arising from the Schedule of proposed modifications of the Plan It is noted that there are an 250 additional dwellings proposed in Trowbridge across 4 site allocations which were previously assessed by Highways England. Furthermore, all site allocations within Market Lavington (80 dwellings) and Crudwell (50 dwellings) have been omitted from the Plan. Strategic Road Network (A36) updated references; PC74 Warminster Updated to include a reference that new developments are required to address any direct or indirect cumulative impact on the A36. PC100 Update provided to highlight that a refresh of the Salisbury Transport Strategy has taken place in dialogue with Highways England. PC106 Netherhampton Updated to highlight that Transport Assessment is necessary, in addition to the provision of network improvements in conjunction with development proposals Highways England welcomes these updates to the WHSAP which strengthen the requirement for proposals to be supported by appropriate transport assessment and mitigation necessary to ensure that impact on the SRN is not severe. Salisbury Transport Strategy (STS) and A36 Southampton Road Study Highways England has worked collaboratively with Wiltshire Council to refresh the Salisbury Transport Strategy which sets out a package of high-level highways and transport interventions to improve accessibility and support growth and development across the city. In parallel to the STS refresh and recognising particular constraints at A36 Southampton Road, Highways England is progressing a study to identify potential options to improve the existing performance and operation of this link and to help to facilitate growth aspirations across the City. Highways England is working closely with Wiltshire County Council in the development of this study, which will dovetail with the Salisbury Transport Strategy. The study is due to conclude in early 2019. Both highway authorities recognise the challenges of the existing and predicted situations resulting from growth along the A36T through Salisbury. Highways England welcome the opportunity to continue to work with the Council to further develop a joint understanding of the issues, problems and</p>			

	limitations of the existing network, and thus work towards the identification of interventions that will enable the safe accommodation of growth whilst also delivering improvements to journey times and journey reliability.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	185	<b>Consultee</b> Asset Manager South West Highways Agency	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 903251		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC106				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>WILTSHIRE COUNCIL WILTSHIRE HOUSING SITE ALLOCATION PLAN SCHEDULE OF PROPOSED CHANGES - CONSULTATION</p> <p>OCTOBER 2018 Highways England welcomes the opportunity to comment on the Schedule of proposed changes to the emerging Wiltshire Housing Site Allocation Plan (WHSAP). As you are aware Highways England is responsible for operating, maintaining and improving the Strategic Road Network (SRN) to support its primary function - that is the safe and efficient movement of people and goods, alongside its long term integrity. In the Plan area, the SRN comprises parts of the M4 and A36. In recognition of our responsibilities, the following comments are made. Highways England previously provided a formal consultation response dated 21 September 2017 for the pre submission draft of the WHSAP. A further consultation response was provided dated 29 March 2018 in relation to proposed additional housing sites. While this response addresses further changes, the same policy requirements set out in the letter dated 21 September 2017 continue to apply to the WHSAP and the new sites identified. Matters arising from the Schedule of proposed modifications of the Plan It is noted that there are an 250 additional dwellings proposed in Trowbridge across 4 site allocations which were previously assessed by Highways England. Furthermore, all site allocations within Market Lavington (80 dwellings) and Crudwell (50 dwellings) have been omitted from the Plan. Strategic Road Network (A36) updated references; PC74 Warminster Updated to include a reference that new developments are required to address any direct or indirect cumulative impact on the A36. PC100 Update provided to highlight that a refresh of the Salisbury Transport Strategy has taken place in dialogue with Highways England. PC106 Netherhampton Updated to highlight that Transport Assessment is necessary, in addition to the provision of network improvements in conjunction with development proposals Highways England welcomes these updates to the WHSAP which strengthen the requirement for proposals to be supported by appropriate transport assessment and mitigation necessary to ensure that impact on the SRN is not severe. Salisbury Transport Strategy (STS) and A36 Southampton Road Study Highways England has worked collaboratively with Wiltshire Council to refresh the Salisbury Transport Strategy which sets out a package of high-level highways and transport interventions to improve accessibility and support growth and development across the city. In parallel to the STS refresh and recognising particular constraints at A36 Southampton Road, Highways England is progressing a study to identify potential options to improve the existing performance and operation of this link and to help to facilitate growth aspirations across the City. Highways England is working closely with Wiltshire County Council in the development of this study, which will dovetail with the Salisbury Transport Strategy. The study is due to conclude in early 2019. Both highway authorities recognise the challenges of the existing and predicted situations resulting from growth along the A36T through Salisbury. Highways England welcome the opportunity to continue to work with the Council to further develop a joint understanding of the issues, problems and</p>			

	limitations of the existing network, and thus work towards the identification of interventions that will enable the safe accommodation of growth whilst also delivering improvements to journey times and journey reliability.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	186	<b>Consultee</b> Historic Environment Planning Advisor South West/ West Midlands Historic England	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 403792		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC61				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Historic England note the proposed modifications that seek to ensure due regard is had to conserving the significance of the affected heritage assets and their settings. However, as the adjacent cemetery is in a poor condition and clearly at risk might the opportunity be taken for the Plan and associated development support improvements as part of a positive strategy for the historic environment ( NPPF para185)? Does the Plan make clear how this area of archaeological significance should be addressed?				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5128980				



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	187	<b>Consultee</b> Historic Environment Planning Advisor South West/ West Midlands Historic England	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 403792		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC68				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Historic England note and welcome the proposed modifications that seek to ensure due regard is had to conserving the significance of the affected heritage assets and their settings. However, might the Plan be more specific regarding the need to avoid the redevelopment of the paddock adjacent to Church Lane and to the rear of the listed buildings fronting Frome Road? Does the Plan make clear how this area of archaeological significance should be addressed?				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5128980				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	188	<b>Consultee</b> Historic Environment Planning Advisor South West/ West Midlands Historic England	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 403792		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC72				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Historic England note and welcome the proposed clarifications / modifications that seek to ensure due regard is had to conserving the significance of the affected heritage assets and their setting. However, during recent discussion with the local authority and site promoters, it was apparent that to avoid undue harm to the significance of Southwick Court, the design of any future road across the site and junction off the A361 (Frome Road) required a very sensitive bespoke approach; a rural/parkland/ country estate typology with discreet low level lighting and unobtrusive signage to minimise harmful intrusion within this historic landscape. It will be important for the Plan to clearly set out such expectations.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5128980				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	189	<b>Consultee</b> Historic Environment Planning Advisor South West/ West Midlands Historic England	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 403792		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC77				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Historic England note the proposed modifications that seek to ensure due regard is had to conserving the significance of the affected heritage assets and their settings. However, during a recent meeting with the Local Authority and site promoter, it became apparent that at present it could not be demonstrated with any degree of confidence that a residential scheme could come forward to accord with the objectives of the Plan and its specific conditions for the site; legislation, national policy and guidance in respect of the great weight that needs to be afforded the conservation of affected heritage assets and their setting. It was left for the site promoters and Wiltshire Council to reconsider the matter. At present Historic England consider the site allocation is inappropriate.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5128980				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	190	<b>Consultee</b> Historic Environment Planning Advisor South West/ West Midlands Historic England	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 403792		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC104				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Historic England note and welcome the proposed modifications that seek to ensure due regard is had to conserving the significance of the affected heritage assets and their settings. This is an important site in relation to the integrity of historic Salisbury, its Cathedral and the wider landscape setting. There is some doubt that a scheme could accord with the objectives of the Plan, the site specific conditions, national policy and guidance in respect of the great weight that needs to be afforded the conservation of affected heritage assets and their setting, primarily in this respect, Salisbury Cathedral. However at a recent constructive meeting with the local authority and site promoter, it was agreed that further evidence might be prepared and submitted to provide a degree of reasonable confidence that a scheme could be forthcoming that delivers a satisfactory housing development in accordance with the above expectations. We await the outcome of such further work before the proposed allocation can be considered appropriate. The Plan should also make clear how this area of archaeological sensitivity should be addressed.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5128980				



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	191	<b>Consultee</b> Test Valley Borough Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 390753		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC40				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Thank you for consulting with TVBC on the proposed amendments for the above document. I have reviewed those amendments (PC40-44) which are most relevant to the Councils previous submissions, concerning development at Ludgershall, and can confirm that there is no objection to the proposed amendments.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	192	<b>Consultee</b> Test Valley Borough Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 390753		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC41				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Thank you for consulting with TVBC on the proposed amendments for the above document. I have reviewed those amendments (PC40-44) which are most relevant to the Councils previous submissions, concerning development at Ludgershall, and can confirm that there is no objection to the proposed amendments.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	193	<b>Consultee</b> Test Valley Borough Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 390753		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC42				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Thank you for consulting with TVBC on the proposed amendments for the above document. I have reviewed those amendments (PC40-44) which are most relevant to the Councils previous submissions, concerning development at Ludgershall, and can confirm that there is no objection to the proposed amendments.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	194	<b>Consultee</b> Test Valley Borough Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 390753		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC43				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Thank you for consulting with TVBC on the proposed amendments for the above document. I have reviewed those amendments (PC40-44) which are most relevant to the Councils previous submissions, concerning development at Ludgershall, and can confirm that there is no objection to the proposed amendments.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	195	<b>Consultee</b> Test Valley Borough Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 390753		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC44				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Thank you for consulting with TVBC on the proposed amendments for the above document. I have reviewed those amendments (PC40-44) which are most relevant to the Councils previous submissions, concerning development at Ludgershall, and can confirm that there is no objection to the proposed amendments.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	196	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187599	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC3				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 3 and Annex A Table 4.1 Housing Land Supply [TABLE INSERT] 1. Because the latest completion and commitment figures (PC3) for South Wiltshire (and North and West Wiltshire) increase significantly the minimum to be allocated 2017 2026 (see 5th column above) the Authority (and now the Inspector) need to respond in a sound and responsible and timely way. 2. In the case of South Wiltshire, plainly there is a need to allocate something like twice as much housing because 594 was the target to be allocated in 2017 and the Council now (September 2018) needs to identify a further 737 more houses to bring up the amount of housing to meet the minimum housing requirement up to 1,331. Wiltshire Council is not proposing to do anything about this. 3. In our opinion, the Council (and now the Inspector) must increase the amount of land to be allocated for housing in a commensurate way to meet need and ensure a 5-year housing land supply. (See also our comments regarding PCs 15, 16, 17, 27, 28 and in respect of the Atkins Sustainability Assessment, particularly para 8.3.226 etc.) 4. Furthermore, the wording of the first column as Minimum to be allocated fails to indicate a likely acceptable range contrary to NPPF (1) 6: Delivering a wide choice of high-quality homes. NPPF (1) promotes flexibility and delivery through, inter alia, the use of an additional buffer (para 47). We are therefore asking the Inspector under Section 20 (7C) - because there are only about 7 years left until the end of the plan period (2026) - and given housing need - to identify sufficient land to come forward. It is reasonable to suggest a 5% range, on top of the minimum requirement. We set out below our proposed amendment to Table 4.1. For South Wiltshire, this means the target range should be between 1,331 and 1,852 dwellings between 2017 2026. [TABLE INSERT] 5. Background argument: PC3 is not legally compliant because: (i) it does not appropriately reflect guiding legislation; (ii) nor is it in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 6. The proposed change is not sound because whilst the numbers are factual, the Authority has failed to react to what the new numbers mean and therefore we say this draft document: (1) it is not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) it is not sufficiently justified; (3) it is not able to respond to change; and, (4) it is not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 7. We are asking the Inspector to amend PC 3 that includes Table 4.1 at Annex A in accordance with our paragraph 4 above. Likewise, with the explanatory wording. Our proposed change is set out at Paragraph 8 below. These two changes would enable, with other knock-on amendments elsewhere in the Proposed Changes, the allocation of further housing land at H3.6 Clover Lane, Durrington. Briefing note to the Inspector: As this is the first of our objections, we now enclose site specific information about H3.6 and the adjoining land known as S98. This H3.6/S98 site passes all the key preliminary site Sustainability and Environmental Impact Assessments, in our opinion. This information is attached at</p>				

	Appendix 1. It should have been taken more seriously by Wiltshire Council when it was duly submitted in respect of the Wiltshire Housing Site Allocations Plan back in September 2017. 8. We are suggesting PC3s justification should be amended on p2 of EXAM 01 as follows (our suggestions are in bold below): - factual update to table of figures to reflect the latest Housing Land Supply Statement published March 2018 (base date April 2017) and to increase the allocation of housing land in accordingly and in accordance with Section 6 of NPPF (1).		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	197	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187599	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC15				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 15 and Annex A Table 4.7 Windfall and Housing Land Supply [TABLE INSERT] 1. Summary of our windfall objection: the proposed latest windfall allowance 2017 - 2026 in the 5th column seeks to increase the windfall allowance to try to fix the increasing housing land shortfall (see our objection to PC 3 etc). In our opinion, this is contrary to NPPF (1) that is tilted 6: Delivering a wide choice of high-quality homes and also deals with windfall housing. 2. NPPF (1) para 48 promotes flexibility and delivery and warns Planning Authorities not to use an allowance for windfall sites unless the evidence is - realistic - reliable and - compelling. No such evidence has been submitted and those numbers should be viewed with caution. 3. Further, with the considerable tightening of all the main settlements boundaries and the exclusion of residential gardens, infill windfall brownfield housing cannot be a reliable supply: it is a dwindling asset. The forecast amount of windfall sites coming forward should be conservative, robust and reliable, not hopeful and optimistic (fingers crossed). 4. It is very important point to note and in fairness to the Authority, Wiltshire Council do indeed (of course) concede this at para 5.7 of Topic Paper 3 (July 2018): the use of a windfall allowance should not be relied upon. 5. However, it is not realistic to say windfalls should be completely not relied upon. This is too extreme and contradictory a position for the Authority to take. Para 5.7 should be amended accordingly. 6. We are therefore again placing before the Inspector under S20 (7C) an invitation to correct this significant flaw and contradiction in the DPD and supporting paperwork. We are suggesting a simple, robust and reliable 4% windfall allowance (4% of the minimum housing requirement). In the context of our Objection to PC15, this means the windfall for South Wiltshire should be c. 420 dwellings rather than c. 740 between 2017 - 2026: [TABLE INSERT] 7. Forgive the complexity of the next table, but we have applied the 4% windfall to Table 4.7 whilst also taking into account our objection to PC 3 regarding the need to allocate more housing land and identify a housing requirement range, rather than an absolute minimum [TABLE INSERT] 8. Background argument: PC15 is not legally compliant because: (i) it does not appropriately reflect guiding legislation; (ii) nor is it in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of highquality homes. 9. The proposed change in Table 4.7 is not sound because: (1) it is not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) it is not sufficiently justified; (3) it is not able to respond to change; and, (4) it is not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 10. We are asking the Inspector to amend PC 15 and Annex A and particularly Table 4.7 (see above) and also the explanatory wording at Para 5.7 of The Topic Paper 3: HLSA (July 2018).</p>			

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	5129049		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	No, the Proposed Change does not meet a previous objection		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	Yes	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	Yes

<b>Comment ID:</b>	198	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187599	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC16				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 16 and PC 17: Five Year Housing Land Supply [TABLE INSERT]</p> <p>1. Summary of our 5 Year Housing Land Supply objection: the proposed latest information (above) is contrary to NPPF (1) 6: Delivering a wide choice of high-quality homes with respect to both South Wiltshire and N/W Wiltshire. The Framework (1) now imposes a duty on Wiltshire Council to take steps to rectify the problem and not rely on a later review of the WCS (Wiltshire Core Strategy) that may take several years. 2. This DPD needs to provide now a reliable and realistic, planned 2018 - 2026, 5 Year Supply to deliver much needed homes of a type and tenure in the right place continuously. 3. Having more than a 5 years housing land supply (much better to have at least 7 or 8 years) also encourages commensurate with the amount - greater choice for consumers. This keeps house prices lower through competition. Having more than 5 years land supply is essential it brings greater surety and greater resilience, should one or more sites be delayed. To correct this flaw that is painfully obvious in PCs 16 and 17, more developable and deliverable land, in accordance with Footnotes 11 and 12 on p12 of NPPF (1) - must be brought forward from the list of Omission Sites etc. Benchmarks proposed revisions to PC 17 include: [TABLE INSERT] 4. PC16 and 17 are not legally compliant because: (i) they do not appropriately reflect guiding legislation; (ii) nor are they in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of highquality homes. 5. PC 16 and PC 17 Table 4.8 and supporting text are not sound because: (1) they are not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) they are not sufficiently justified; (3) they are not able to respond to change; and, (4) they are not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 6. We are asking the Inspector to amend PC 16 and PC17 and Annex A particularly the table (see above) and also the explanatory wording by allocating more land for housing in South Wiltshire (an N + W Wiltshire, too).</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		



<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5129182		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	199	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187599	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC17				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 16 and PC 17: Five Year Housing Land Supply [TABLE INSERT] 1. Summary of our 5 Year Housing Land Supply objection: the proposed latest information (above) is contrary to NPPF (1) 6: Delivering a wide choice of high-quality homes with respect to both South Wiltshire and N/W Wiltshire. The Framework (1) now imposes a duty on Wiltshire Council to take steps to rectify the problem and not rely on a later review of the WCS (Wiltshire Core Strategy) that may take several years. 2. This DPD needs to provide now a reliable and realistic, planned 2018 - 2026, 5 Year Supply to deliver much needed homes of a type and tenure in the right place continuously. 3. Having more than a 5 years housing land supply (much better to have at least 7 or 8 years) also encourages commensurate with the amount - greater choice for consumers. This keeps house prices lower through competition. Having more than 5 years land supply is essential it brings greater surety and greater resilience, should one or more sites be delayed. To correct this flaw that is painfully obvious in PCs 16 and 17, more developable and deliverable land, in accordance with Footnotes 11 and 12 on p12 of NPPF (1) - must be brought forward from the list of Omission Sites etc. Benchmarks proposed revisions to PC 17 include: [TABLE INSERT] 4. PC16 and 17 are not legally compliant because: (i) they do not appropriately reflect guiding legislation; (ii) nor are they in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of highquality homes. 5. PC 16 and PC 17 Table 4.8 and supporting text are not sound because: (1) they are not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) they are not sufficiently justified; (3) they are not able to respond to change; and, (4) they are not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 6. We are asking the Inspector to amend PC 16 and PC17 and Annex A particularly the table (see above) and also the explanatory wording by allocating more land for housing in South Wiltshire (an N + W Wiltshire, too).				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

Please state which evidence document this representation relates to:		Please give details of why you support or do not support the updates to the associated evidence documents.	
Supporting documents (Please see Objective)	5129182		
Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?	No, the Proposed Change does not meet a previous objection		
Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.	Yes	Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.	Yes

Comment ID:	200	<b>Consultee</b> <b>Person ID:</b> 703547	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
				<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>		PC94			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. I agree with everything stated by the neighbourhood plan steering group. Five houses are already undergoing construction. A large number of houses would change the whole character of the village. No more houses should be built until the neighbourhood plan is in place.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	201	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 704447	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional Comments: Consultation document not available at Wilts Council Trowbridge on 5/11/18 so unable to comment on specific matters raised. From discussion with Planning Officer (very helpful) I question the need for the quantity of dwellings (35) proposed in the WHSAP. I also believe that an appropriate number of dwelling within the existing village boundary would be preferable. The matter should await the establishment of the Bratton Neighbourhood plan.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			



<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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Comment ID:	202	<b>Consultee</b> <b>Person ID:</b> 1187599	<b>Agent</b> Director Benchmark Development Planning Ltd <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be legally compliant?</b> No
				<b>Do you consider the Proposed Change to be sound?</b> No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy
<b>Identify Proposed Change Reference Number</b>		PC27		
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objections to PC 27 and PC 28 and Annex A Table 4.11 Housing Land Supply and Annex J by Benchmark (Nov 2018) [TABLE INSERT] 1. Summary of our objection to PC 27 and PC 28: the proposed changes indicate shortfalls in supply but hides key information about how big the shortfall is based on the minimum requirement. The column headings are also misleading. Finally, because of the shortage of developable land (see our objections to PC3, PC 15 etc) the wording of the first column as indicative requirement is not the same as a Minimum to be allocated. In any event, in our opinion, PC27 fails to indicate a likely acceptable range contrary to NPPF (1) 6: Delivering a wide choice of highquality homes. NPPF (1) promotes flexibility and delivery through, inter alia, the use of an additional buffer (para 47). 2. We are therefore asking the Inspector under Section 20 (7C) - because there are only about 7 years left until the end of the plan period (2026) - and given housing need - to identify sufficient land to come forward and improve the 5-year supply of housing land after 2022. It is reasonable to suggest a 5% buffer see revised Table 4.11, next page: [TABLE INSERT] 3. Background argument: PC27 and PC 28 are not legally compliant because: (i) they do not appropriately reflect guiding legislation; (ii) nor are they in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of high-quality homes. 4. The proposed changes are not sound because: (1) they are not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) they are not sufficiently or robustly justified; (3) they are not able to respond to change; and, (4) they are not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 5. We are asking the Inspector to amend PC 27 and Annex A and Annex J - particularly the table (see above) and also the explanatory wording (our suggestions are in bold as follows): Factual Update to table of figures to reflect the latest Housing Land Supply Statement published March 2018 (base date April 2017). This has also been updated to reflect the addition of a new housing allocation at Salisbury and an extended allocation at Durrington and the minimum and top end range of housing requirements (see PC111). (Source: Exam.01 Schedule of Proposed Changes Sept 2018 p10). 6. We do not consider using the word factual is sound (see reasons see above). The impact of the unhealthy increasing gap between (A) minimum housing requirement and ( E ) supply needs to be interpreted and explained, properly, hence our objection to PC 28 etc. 7. Objection to PC 28 We note that paragraph 4.63 below Table 4.11 is an attempt to describe the meaning of the numbers. It is not a factual statement. It is a subjective judgement slightly less generous is to become slightly less generous but these words are still not either reasonable nor proportionate to the shortfall. This is the context: The South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire. (Source: WHSAP0101 Submission Document July 2018). 8. The Council is saying their proposed minimum allocation is an act of generosity. Using the word generous is not fair</p>			

or sensible. It is an exaggeration and misleading. We now suggest the following wording in the context of all our objections and the promotion of H3.6 Clover Lane, Durrington that comprises part of S98 Hackthorne Rd, Durrington (see Plans attached). Benchmarks proposed new para 4.63: The South Wiltshire HMA did not have a sound has a slightly less generous housing land supply than elsewhere in when compared to other areas of Wiltshire in September 2018 and so further land has been brought forward for development before 2026 in the Amesbury, Bulford, Durrington Community Area where the shortfall was significant. The site at H3.6 Clover Lane / Hackthorne Road, Durrington now has an increased minimum allocation from at least 45 to 110, to address this shortfall. (Proposed amendment to para 4.63 by Benchmark, Oct 2018.) 9. Please note, the housing figures do not need to radically change to make the Plan sound. However, making optimal use of locations already preferred for development is a robust and sustainable way forward. Of course, windfall sites will also play a part see our objections to PC 15 where we are suggesting a robust and deliverable windfall figure for South Wiltshire of at least 420 houses 2017 2026 (not the Authoritys over-ambitious 743). 10. We are therefore asking the Inspector to improve the Plan and make it sound, by bringing forward additional land at H3.6 Clover Lane, Durrington (from S98 Hackthorne Road) as follows and see Plans 1 to 5: [TABLE INSERT] 11. In 2016 and then September 2017 and then again in March 2018, we submitted to Wiltshire Council, following several emails and meetings in early 2018, detailed information about H3.6 Clover Lane and S98 Hackthorne Road, Durrington. The Council therefore did have every opportunity to try to re-balance the housing numbers and to fully consult, in the usual way 2016 - 2018. 12. We now understand that the information requested by Officers in March 2018 and submitted at that time has not been submitted to the Secretary of State for consideration at the forthcoming DPD. 13. If the Inspector does consider it sound to increase the supply of allocated land, then he will also need to also receive the same information already submitted to Wiltshire Council in March 2018 in respect of H3.6 and adjoining remnant land: S98 Hackthorne Road, Durrington (about a quarter of S98 is already included in H3.6). 14. We therefore now enclose the March 2018 information, submitted by email: We have pleasure enclosing our response to your emails and the last two recent meetings at your office. Attached to this email you will find: Drainage Technical Note by Baker Gilbey Associates for H3.5 and S98 Land at Clover Lane, DURRINGTON. Their conclusion is: From the initial investigations, the site could readily be serviced in terms of foul and surface water drainage, without impacting on the SSSI or the Groundwater Source Protection Zone (p6). Illustrative layouts to provide you with an idea of the housing numbers, for all the relevant permutations Aerial photos of the site (drone video footage is also available) Our consultant team includes: KP ecology Forum heritage AC Archaeology Bellamy Roberts Highway Engineers (report attached) Baker Gilbey Hydrology and Drainage Engineers (see above) Benchmark master planning & landscape see layouts and all the various submission to the Housing DPD (2014 2018) The Ecology Statement confirms the stables and associated buildings have negligible bat potential and are not suitable for bats. In respect of all the land shown on the illustrative plans (excluding Piece Meadow) it is concluded that: There are no reasons with regards to ecology why this site cannot be developed. Bats are the most important species using the site, but they are doing so along the boundaries, so will need to ensure very low-level lighting/no lighting along these. Other than that as long as you clear vegetation at the right time of year and provide ecological enhancements, there are no significant ecological challenges on H3.5 and S98. Forum Heritage ([REDACTED] of Forum helped write the Durrington Conservation Area Statement) In my opinion ([REDACTED]), the position of the proposed access off Hackthorne Road will not cause harm to the character and appearance of the Durrington Conservation Area. With respect of the Grade II listed Durrington Manor Farmhouse, this house does not seem to have had an important visual relationship with the fields to the west as there is only one window in the west elevation. Similarly, the proposed access will not harm the setting of the Grade II listed Manor House and Hackthorne Cottage. In my view this is a site which is capable of being developed for residential use although the constraints of the Conservation Area and the setting of the Grade II listed Durrington Manor House mean that a design more reflective of the historic uses of the site would be more appropriate AC Archaeology concluded a 2% trench sample would be needed for the planning application stage: Overall, the site has the potential to contain significant archaeological remains that would require mitigation, through planning condition, but I see nothing in the archaeological data that we have to hand that would be of such importance to warrant refusal of permission on historic environment grounds. Bellamy Roberts Highway Engineers have concluded: I am content that an access off Hackthorne

	<p>Road as identified previously is sufficient to accommodate the 140 dwellings. , it would be of benefit to provide a pedestrian/cycle link from the site through the existing access track serving the stables. This would enhance overall permeability. Conclusions: We commend the allocation of the land identified to you because it is available, suitable and viable for residential development and it is both deliverable and developable in terms of footnotes 11 and 12 from the 2012 NPPF and the proposed definition of the word deliverable in the Glossary of the Draft NPPF March 2018. The site is AVAILABLE NOW, OFFERS A SUITABLE LOCATION FOR DEVELOPMENT NOW, AND IT IS ACHIEVABLE WITH A REALISTIC PROSPECT THAT HOUSING WILL BE DELIVERED ON THE SITE WITHIN FIVE YEARS. Yours sincerely 15. We are enclosing at Appendix 1: the information submitted in March 2018. 16. We are also enclosing at Appendix 2: further information on surface water drainage. 17. Appendix 3 refers to our Plan 1 which is based on Annex J re: H3.6 Clover Lane, Durrington: Annex J shows existing H3.6 Clover Lane for at least 45 dwellings (Sep 2018) - see red and blue dotted line - to be extended to include all the adjacent blue land and the allocation increased to at least 110 dwellings (see also Plan 2). All the land shaded blue formally known as S98 is in one ownership and deliverable and developable before 2026 (see evidence already submitted 2016, September 2017 and March 2018 on design, access, ecology, trees, heritage, archaeology, drainage, FRA and phosphates * etc). We are suggesting the enlarged site be called: 3.6 Clover Lane and Hackthorne Road, Durrington see p 130 of this document.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw; No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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Comment ID:	203	<b>Consultee</b>  <b>Person ID:</b>  1187599	<b>Agent</b>  Director Benchmark Development Planning Ltd  <b>Person ID:</b>  894742	<b>Do you consider the Proposed Change to be legally compliant?</b>  No
				<b>Do you consider the Proposed Change to be sound?</b>  No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy
<b>Identify Proposed Change Reference Number</b>	PC28			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objections to PC 27 and PC 28 and Annex A Table 4.11 Housing Land Supply and Annex J by Benchmark (Nov 2018) [TABLE INSERT] 1. Summary of our objection to PC 27 and PC 28: the proposed changes indicate shortfalls in supply but hides key information about how big the shortfall is based on the minimum requirement. The column headings are also misleading. Finally, because of the shortage of developable land (see our objections to PC3, PC 15 etc) the wording of the first column as indicative requirement is not the same as a Minimum to be allocated. In any event, in our opinion, PC27 fails to indicate a likely acceptable range contrary to NPPF (1) 6: Delivering a wide choice of highquality homes. NPPF (1) promotes flexibility and delivery through, inter alia, the use of an additional buffer (para 47). 2. We are therefore asking the Inspector under Section 20 (7C) - because there are only about 7 years left until the end of the plan period (2026) - and given housing need - to identify sufficient land to come forward and improve the 5-year supply of housing land after 2022. It is reasonable to suggest a 5% buffer see revised Table 4.11, next page: [TABLE INSERT] 3. Background argument: PC27 and PC 28 are not legally compliant because: (i) they do not appropriately reflect guiding legislation; (ii) nor are they in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of high-quality homes. 4. The proposed changes are not sound because: (1) they are not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) they are not sufficiently or robustly justified; (3) they are not able to respond to change; and, (4) they are not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 5. We are asking the Inspector to amend PC 27 and Annex A and Annex J - particularly the table (see above) and also the explanatory wording (our suggestions are in bold as follows): Factual Update to table of figures to reflect the latest Housing Land Supply Statement published March 2018 (base date April 2017). This has also been updated to reflect the addition of a new housing allocation at Salisbury and an extended allocation at Durrington and the minimum and top end range of housing requirements (see PC111). (Source: Exam.01 Schedule of Proposed Changes Sept 2018 p10). 6. We do not consider using the word factual is sound (see reasons see above). The impact of the unhealthy increasing gap between (A) minimum housing requirement and ( E ) supply needs to be interpreted and explained, properly, hence our objection to PC 28 etc. 7. Objection to PC 28 We note that paragraph 4.63 below Table 4.11 is an attempt to describe the meaning of the numbers. It is not a factual statement. It is a subjective judgement slightly less generous is to become slightly less generous but these words are still not either reasonable nor proportionate to the shortfall. This is the context: The South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire. (Source: WHSAP0101 Submission Document July 2018). 8. The Council is saying their proposed minimum allocation is an act of generosity. Using the word generous is not fair		

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Bats are the most important species using the site, but they are doing so along the boundaries, so will need to ensure very low-level lighting/no lighting along these. Other than that as long as you clear vegetation at the right time of year and provide ecological enhancements, there are no significant ecological challenges on H3.5 and S98. Forum Heritage ([REDACTED] of Forum helped write the Durrington Conservation Area Statement) In my opinion ([REDACTED]), the position of the proposed access off Hackthorne Road will not cause harm to the character and appearance of the Durrington Conservation Area. With respect of the Grade II listed Durrington Manor Farmhouse, this house does not seem to have had an important visual relationship with the fields to the west as there is only one window in the west elevation. Similarly, the proposed access will not harm the setting of the Grade II listed Manor House and Hackthorne Cottage. In my view this is a site which is capable of being developed for residential use although the constraints of the Conservation Area and the setting of the Grade II listed Durrington Manor House mean that a design more reflective of the historic uses of the site would be more appropriate AC Archaeology concluded a 2% trench sample would be needed for the planning application stage: Overall, the site has the potential to contain significant archaeological remains that would require mitigation, through planning condition, but I see nothing in the archaeological data that we have to hand that would be of such importance to warrant refusal of permission on historic environment grounds. Bellamy Roberts Highway Engineers have concluded: I am content that an access off Hackthorne

	<p>Road as identified previously is sufficient to accommodate the 140 dwellings. , it would be of benefit to provide a pedestrian/cycle link from the site through the existing access track serving the stables. This would enhance overall permeability. Conclusions: We commend the allocation of the land identified to you because it is available, suitable and viable for residential development and it is both deliverable and developable in terms of footnotes 11 and 12 from the 2012 NPPF and the proposed definition of the word deliverable in the Glossary of the Draft NPPF March 2018. The site is AVAILABLE NOW, OFFERS A SUITABLE LOCATION FOR DEVELOPMENT NOW, AND IT IS ACHIEVABLE WITH A REALISTIC PROSPECT THAT HOUSING WILL BE DELIVERED ON THE SITE WITHIN FIVE YEARS. Yours sincerely 15. We are enclosing at Appendix 1: the information submitted in March 2018. 16. We are also enclosing at Appendix 2: further information on surface water drainage. 17. Appendix 3 refers to our Plan 1 which is based on Annex J re: H3.6 Clover Lane, Durrington: Annex J shows existing H3.6 Clover Lane for at least 45 dwellings (Sep 2018) - see red and blue dotted line - to be extended to include all the adjacent blue land and the allocation increased to at least 110 dwellings (see also Plan 2). All the land shaded blue formally known as S98 is in one ownership and deliverable and developable before 2026 (see evidence already submitted 2016, September 2017 and March 2018 on design, access, ecology, trees, heritage, archaeology, drainage, FRA and phosphates * etc). We are suggesting the enlarged site be called: 3.6 Clover Lane and Hackthorne Road, Durrington see p 130 of this document.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		



<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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Comment ID:	204	<b>Consultee</b> <b>Person ID:</b> 1187599	<b>Agent</b> Director Benchmark Development Planning Ltd <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be legally compliant?</b> No
				<b>Do you consider the Proposed Change to be sound?</b> No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy
<b>Identify Proposed Change Reference Number</b>		PC114		
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objections to PC 27 and PC 28 and Annex A Table 4.11 Housing Land Supply and Annex J by Benchmark (Nov 2018) [TABLE INSERT] 1. Summary of our objection to PC 27 and PC 28: the proposed changes indicate shortfalls in supply but hides key information about how big the shortfall is based on the minimum requirement. The column headings are also misleading. Finally, because of the shortage of developable land (see our objections to PC3, PC 15 etc) the wording of the first column as indicative requirement is not the same as a Minimum to be allocated. In any event, in our opinion, PC27 fails to indicate a likely acceptable range contrary to NPPF (1) 6: Delivering a wide choice of highquality homes. NPPF (1) promotes flexibility and delivery through, inter alia, the use of an additional buffer (para 47). 2. We are therefore asking the Inspector under Section 20 (7C) - because there are only about 7 years left until the end of the plan period (2026) - and given housing need - to identify sufficient land to come forward and improve the 5-year supply of housing land after 2022. It is reasonable to suggest a 5% buffer see revised Table 4.11, next page: [TABLE INSERT] 3. Background argument: PC27 and PC 28 are not legally compliant because: (i) they do not appropriately reflect guiding legislation; (ii) nor are they in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of high-quality homes. 4. The proposed changes are not sound because: (1) they are not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) they are not sufficiently or robustly justified; (3) they are not able to respond to change; and, (4) they are not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 5. We are asking the Inspector to amend PC 27 and Annex A and Annex J - particularly the table (see above) and also the explanatory wording (our suggestions are in bold as follows): Factual Update to table of figures to reflect the latest Housing Land Supply Statement published March 2018 (base date April 2017). This has also been updated to reflect the addition of a new housing allocation at Salisbury and an extended allocation at Durrington and the minimum and top end range of housing requirements (see PC111). (Source: Exam.01 Schedule of Proposed Changes Sept 2018 p10). 6. We do not consider using the word factual is sound (see reasons see above). The impact of the unhealthy increasing gap between (A) minimum housing requirement and ( E ) supply needs to be interpreted and explained, properly, hence our objection to PC 28 etc. 7. Objection to PC 28 We note that paragraph 4.63 below Table 4.11 is an attempt to describe the meaning of the numbers. It is not a factual statement. It is a subjective judgement slightly less generous is to become slightly less generous but these words are still not either reasonable nor proportionate to the shortfall. This is the context: The South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire. (Source: WHSAP0101 Submission Document July 2018). 8. The Council is saying their proposed minimum allocation is an act of generosity. Using the word generous is not fair			

or sensible. It is an exaggeration and misleading. We now suggest the following wording in the context of all our objections and the promotion of H3.6 Clover Lane, Durrington that comprises part of S98 Hackthorne Rd, Durrington (see Plans attached). Benchmarks proposed new para 4.63: The South Wiltshire HMA did not have a sound has a slightly less generous housing land supply than elsewhere in when compared to other areas of Wiltshire in September 2018 and so further land has been brought forward for development before 2026 in the Amesbury, Bulford, Durrington Community Area where the shortfall was significant. The site at H3.6 Clover Lane / Hackthorne Road, Durrington now has an increased minimum allocation from at least 45 to 110, to address this shortfall. (Proposed amendment to para 4.63 by Benchmark, Oct 2018.) 9. Please note, the housing figures do not need to radically change to make the Plan sound. However, making optimal use of locations already preferred for development is a robust and sustainable way forward. Of course, windfall sites will also play a part see our objections to PC 15 where we are suggesting a robust and deliverable windfall figure for South Wiltshire of at least 420 houses 2017 2026 (not the Authority's over-ambitious 743). 10. We are therefore asking the Inspector to improve the Plan and make it sound, by bringing forward additional land at H3.6 Clover Lane, Durrington (from S98 Hackthorne Road) as follows and see Plans 1 to 5: [TABLE INSERT] 11. In 2016 and then September 2017 and then again in March 2018, we submitted to Wiltshire Council, following several emails and meetings in early 2018, detailed information about H3.6 Clover Lane and S98 Hackthorne Road, Durrington. The Council therefore did have every opportunity to try to re-balance the housing numbers and to fully consult, in the usual way 2016 - 2018. 12. We now understand that the information requested by Officers in March 2018 and submitted at that time has not been submitted to the Secretary of State for consideration at the forthcoming DPD. 13. If the Inspector does consider it sound to increase the supply of allocated land, then he will also need to also receive the same information already submitted to Wiltshire Council in March 2018 in respect of H3.6 and adjoining remnant land: S98 Hackthorne Road, Durrington (about a quarter of S98 is already included in H3.6). 14. We therefore now enclose the March 2018 information, submitted by email: We have pleasure enclosing our response to your emails and the last two recent meetings at your office. Attached to this email you will find: Drainage Technical Note by Baker Gilbey Associates for H3.5 and S98 Land at Clover Lane, DURRINGTON. Their conclusion is: From the initial investigations, the site could readily be serviced in terms of foul and surface water drainage, without impacting on the SSSI or the Groundwater Source Protection Zone (p6). Illustrative layouts to provide you with an idea of the housing numbers, for all the relevant permutations Aerial photos of the site (drone video footage is also available) Our consultant team includes: KP ecology Forum heritage AC Archaeology Bellamy Roberts Highway Engineers (report attached) Baker Gilbey Hydrology and Drainage Engineers (see above) Benchmark master planning & landscape see layouts and all the various submission to the Housing DPD (2014 2018) The Ecology Statement confirms the stables and associated buildings have negligible bat potential and are not suitable for bats. In respect of all the land shown on the illustrative plans (excluding Piece Meadow) it is concluded that: There are no reasons with regards to ecology why this site cannot be developed. Bats are the most important species using the site, but they are doing so along the boundaries, so will need to ensure very low-level lighting/no lighting along these. Other than that as long as you clear vegetation at the right time of year and provide ecological enhancements, there are no significant ecological challenges on H3.5 and S98. Forum Heritage ([REDACTED] of Forum helped write the Durrington Conservation Area Statement) In my opinion ([REDACTED]), the position of the proposed access off Hackthorne Road will not cause harm to the character and appearance of the Durrington Conservation Area. With respect of the Grade II listed Durrington Manor Farmhouse, this house does not seem to have had an important visual relationship with the fields to the west as there is only one window in the west elevation. Similarly, the proposed access will not harm the setting of the Grade II listed Manor House and Hackthorne Cottage. In my view this is a site which is capable of being developed for residential use although the constraints of the Conservation Area and the setting of the Grade II listed Durrington Manor House mean that a design more reflective of the historic uses of the site would be more appropriate AC Archaeology concluded a 2% trench sample would be needed for the planning application stage: Overall, the site has the potential to contain significant archaeological remains that would require mitigation, through planning condition, but I see nothing in the archaeological data that we have to hand that would be of such importance to warrant refusal of permission on historic environment grounds. Bellamy Roberts Highway Engineers have concluded: I am content that an access off Hackthorne

	<p>Road as identified previously is sufficient to accommodate the 140 dwellings. , it would be of benefit to provide a pedestrian/cycle link from the site through the existing access track serving the stables. This would enhance overall permeability. Conclusions: We commend the allocation of the land identified to you because it is available, suitable and viable for residential development and it is both deliverable and developable in terms of footnotes 11 and 12 from the 2012 NPPF and the proposed definition of the word deliverable in the Glossary of the Draft NPPF March 2018. The site is AVAILABLE NOW, OFFERS A SUITABLE LOCATION FOR DEVELOPMENT NOW, AND IT IS ACHIEVABLE WITH A REALISTIC PROSPECT THAT HOUSING WILL BE DELIVERED ON THE SITE WITHIN FIVE YEARS. Yours sincerely 15. We are enclosing at Appendix 1: the information submitted in March 2018. 16. We are also enclosing at Appendix 2: further information on surface water drainage. 17. Appendix 3 refers to our Plan 1 which is based on Annex J re: H3.6 Clover Lane, Durrington: Annex J shows existing H3.6 Clover Lane for at least 45 dwellings (Sep 2018) - see red and blue dotted line - to be extended to include all the adjacent blue land and the allocation increased to at least 110 dwellings (see also Plan 2). All the land shaded blue formally known as S98 is in one ownership and deliverable and developable before 2026 (see evidence already submitted 2016, September 2017 and March 2018 on design, access, ecology, trees, heritage, archaeology, drainage, FRA and phosphates * etc). We are suggesting the enlarged site be called: 3.6 Clover Lane and Hackthorne Road, Durrington see p 130 of this document.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	205	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1123635	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional Comments: I am greatly concerned over the possible development of the land directly in front of our home in Westbury Road Bratton and the possible effect it will have on our house value and also the impact on our village. The proposed large development is totally out of keeping with the village location. The Westbury Road is already a rat run for commuters to Devizes and Swindon. Trying to pull out onto this road in the morning is a nightmare - the inevitable increase in traffic is only going to make the situation worse. It appears that Wiltshire Council have little interest in what local people think, despite the public consultations/local objection to recent planning applications in Westbury and Warminster they were given approval regardless.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			

<p><b>proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Comment ID:</b>	206	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1137557	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. From reading, and trying to make sense of the paperwork that I have it would seem that there is no reason or requirement for Bratton to have any development at this time. The road between Bratton and Westbury is an absolute disaster for any and all traffic that has to use it. Adding all those proposed properties would just make the road more dangerous. Little "Westbury Market Town" is surrounded by modern housing which is not compatible with the town itself and it is my understanding that numbers of these properties have not yet been sold. Westbury is now largely a dormitory town with the incomers rising before the day starts to dash off to work in Bath, Swindon and often London. This does not do the finances of Westbury shops any good at all. Building the number of houses suggested in Bratton would have much the same effect turning it into a dormitory village since there is nothing in the way of employment nearby. Bratton surgery is excellent BUT is unlikely to be able to cope with an influx of large numbers of people all requiring medical care. I am very very opposed to these developments for Bratton even should they be scaled down.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your</b></p>			

<p><b>objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	207	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187618	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional Comments: I am completely bewildered as to why Bratton is even considered for further development when the Westbury Community Area is already over provisioned by 245 - it's here in black &amp; white!</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	208	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187622	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	209	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1126059	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport. The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	210	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187624	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional Comments: Bratton is not a large village. There is not the proper infrastructure here. Doctor's office always too busy. There are severe parking problems. the traffic through the village is already heavy enough - not to mention the dangers of speeding cars. that particular junction is dangerous. Sightline problems for pedestrians and cyclists' safety have not been considered. There are so many reasons this proposed site is unsuitable and unnecessary: loss of green space, the landscape being spoiled; and the look and feel of the village because of this unsuitable development - Bratton's charm will be effected. Adding more housing in Wiltshire would be far better served in and around Westbury - which is not a village.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			

<p><b>proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	211	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187625	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. I already feel that our village is at capacity and its amenities stretched due to this. Our roads are already used to maximum, and many vehicles use smaller roads within the village to avoid traffic hold-ups/queuing and often at an unacceptable speeds. With more traffic entering the village for the suggested housing will only increase the number of vehicles and worsen the situation further and effectively remove the feeling of village life.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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Comment ID:	212	<b>Consultee</b> <b>Person ID:</b> 1187627	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b> Yes
				<b>Do you consider the Proposed Change to be sound?</b> No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy
<b>Identify Proposed Change Reference Number</b>		PC94		
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>		

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional Comments: Westbury has already been "over developed", without any apparant concern over schooling or medical facilities. A second medical practice has been required at Westbury for some years. The Westbury over development seems now to be proposed for surrounding villages. There is NO employment in Bratton, so all housing development will necesitate travel to and from the village adding to the problems on the narrow B3098.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	213	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1125387	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. As Westbury has over subscribed its housing needs by 200+ and National Policy confirms that in a village of our size up to 10 houses is the maximum permitted both sites 738 and 321 should be abandoned.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	214	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1126317	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional Comments: The WHSAP dated July 2018 is not clear on the proposed number of dwellings for site 321. Stage 4A Para 6.24 shows the SHLAA capacity as 32, but 6.26 shows "capacity after mitigation" of 40, a figure that is repeated in Table 7.1. The problems of safe vehicular and pedestrian access to this site will be greater if 40 units are to be constructed, Even 32 units will pose considerable problems in the provision of safe access, which need to be fully addressed PRIOR to any approval given for development. Site 738 is unsuitable for the reasons detailed above, the potential provision of both sites with joint access to the B3098 is completely unsuitable.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			

<p><b>proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	215	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187629	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. 35 + 22 = 57 houses. This is far too many for any sized village. Only the school might benefit. Where will the people go for employment? The cars coming onto the already busy and narrow entrance to the village is alarming.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	216	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187630	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional Comments: I fully support all of the above points. The planned development for sites 321/738 is far too large and Bratton's amenities simply could not support the increase in population. A small development which would blend in with the existing properties may work and I have every confidence that the Neighbourhood Plan being compiled by the village will be far more suitable due to their knowledge and experience and consultation with the villages which has been excellent so far.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			



<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	217	<b>Consultee</b> <b>Person ID:</b> 1187599	<b>Agent</b> Director Benchmark Development Planning Ltd <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be legally compliant?</b>	
				<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Main Report (EXAM/02A)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p><b>[REFER TO ATTACHMENT FOR FULL REPRESENTATION]</b></p> <p>Objections to Atkins Sustainability Appraisal (Sept 2018) regarding paragraph 8.3.226 by Benchmark (Oct 2018)</p>				

**Assessment Addendum  
(September 2018).**

What does para 8.3.226 say?

[TABLE INSERT]

1. We need to raise an objection to the proposed new text because it is misleading and confusing. However, to begin to understand our point of view, we need to set out the factual background.

2. First, sites S98 and 3154 are defined quite clearly on page 122 under paragraph 7.3.6 of the SA (Exam02ASA). Here is the extract, albeit 'zoomed-in' to assist the reader:

[MAP INSERT]

3. Second, in the table immediately below is the SA score for site S98 owned by our clients. NB Site S98 has an area of about 5 ha and a capacity for about 110 dwellings (see our housing layout Plan 5 attached to our objections to PCs 27 and 28)

[TABLE INSERT]

4. Third, Piece Meadow (site 3154) has a site capacity of about 15 dwellings.

5. So, this means that we can agree with the Authority about the capacity of the two sites (shaded yellow on the map above) as being broadly:

[TABLE INSERT]

6. Perhaps the simple explanation of our confusion might be that the Authority has simply made a 'typo' and the sentence in para 8.3.226 should read ...

"This allocation has been formed from a combination of sites S98 and 3154. These sites were assessed individually in the SA. The allocation of 45 dwellings in the Schedule of Proposed Changes results in a significant reduction in the number of dwellings considered across these two sites (15 103 for Site S98 and 103 15 for Site 3154). This reduction in site size overall addresses some of the sustainability issues identified for these two sites."

7. However, there is a more important point we wish to make about the SA generally, this paragraph as a whole and even more particularly the final sentence in paragraph 8.3.226 that states: "This reduction in site size overall addresses some of the sustainability issues identified for these two sites." Why is the word "overall" used? Is there a difference between the "sustainability issues" for 3154 and S98? (Surely: yes?) ... and several other questions. This is a puzzling sentence not helped by it not being very good English. We think it means a subjective judgement has been made and that several considerations weighed in the balance at the same time. But, frustratingly, this isn't explained. And we wonder if the site has been properly assessed and understood? Certainly, Atkins have never contacted us – whatsoever – to discuss.

8. On balance Atkins/Wiltshire Council probably consider that site 3154 can accommodate 15 dwellings and S98: 30 dwellings? Of course, a total of 45 dwgs.

9. Just to be clear, this 45 dwelling-judgement does not include the parcel of land between 3154 and S98, as shown in blue on the plan below that has had, in the past, planning permission for about 15 houses. This field is a paddock attached to the house called Piece Meadow (3154).

[MAP INSERT]

10. So, this leads us to consider that the amendment to the Sustainability Appraisal, taking an ordinary reading of the words at face value, probably means that Atkins / Council should already support 60 dwellings at H3.6 (not 45), as the table demonstrates below:

[TABLE INSERT]

11. The housing layout plans below, are our interpretation of the situation, showing 60 and 75 dwelling options. Both are comfortable, well designed layouts that are deliverable and developable:

[MAP INSERT]

[MAP INSERT]

12. In the light of all our comments and objections to the emerging Housing DPD and supporting documents (Nov '18), we have demonstrated that there is a need to make optimal use of housing land and locations and allocate more land to meet need and provide a better 5-year housing land supply, post 2021.

13. We are therefore asking the Inspector, as a minimum, to amend the DPD wording to allow an optimal use of the land at H3.6 Clover Lane and adjoining land, including Piece Meadow and S98 for 60 dwellings. We cannot see any reason why Atkins/Wiltshire Council can object, in the light of their SA evidence.

14. But there is more to our case. We are asking the inspector for more than the minimum of 60 dwellings at H3.6. We are asking for at least 100 dwellings.

15. Our team of consultants have produced evidence that we now enclose, that assesses the site thoroughly enough at this stage and adds the information the SA (Sept '18) does not include. The SA does not explain how the decision to divide S98 was made or where the greater areas of sensitivity might be. To fill in this important information, we have asked Officers at meetings between January 2018 and September 2018, for an explanation and this is our position statement

Atkins / consultants for the Council and Officers did not appear to have a detailed knowledge of the site and had not stood on S98 or walked-over the land and boundaries from within the site.

Atkins / consultants for the Council and Officers had not accurately read our plans and reports from our team (arboriculturist, highway engineer, ecologist, Flood Risk expert, architect etc) in support of the scheme but also in respect of the position of the proposed access from Hackthorne Road and mistakenly thought it to be within the Conservation Area (it is not – it is 50m to the west). Furthermore, no tree removal is necessary. Plus, the highway junction with Hackthorne Road, works in technical highway-terms, in all respects.

	<p>Atkins / consultants for the Council and Officers appeared not to have understood our evidence about providing surface water storage to protect the River Avon SAC and deal effectively with phosphates.</p> <p>We have still not been able to meet Officers or their consultants on site to discuss these matters.</p> <p>16. These experiences and the SA's generalised and nebulous assessment of S98 can be readily explained because of the enormity (and complexity) of the task facing Wiltshire Council. But even so, as H3.6 and part of S98 is a housing allocation, it does deserve a much more detailed understanding, particularly to overcome the impression that the way the land has been divided, has boiled down to intangible 'gut feelings' – which may not be sound.</p> <p>17. If two guiding principles can be boiled down to they are probably: heritage and the River Avon SAC – all of which are to the north east of S98. We do now ask The Inspector to make note that the north eastern parts of S98 between the A345 and Hackthorne Road are more between 150 – 315 metres from the River and also to bear in mind, S98 is very well enclosed by its dense TPO'd tree belt.</p> <p>18. Our preferred way forward is for about 140 houses at a newly titled: H3.6 Clover land and Hackthorne Road, Durrington:</p> <p>[MAP INSERT]</p>		
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5129808</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	218	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187632	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	219	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. The only benefit I see from this development would be to the owner and builders who no doubt would be financially better off. The project is the thin end of the wedge. It would be a precedent set for the next field along to be developed and before long we will be turned into the outskirts of Westbury and joined with Edington the other way. It is not needed, not planned for, more green fields lost, pressure on the school, doctors, roads etc I well and truly am against this development.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	220	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1125357	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	221	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187633	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			



	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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Comment ID:	222	<b>Consultee</b> <b>Person ID:</b> 704184	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b> Yes
				<b>Do you consider the Proposed Change to be sound?</b> No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy
<b>Identify Proposed Change Reference Number</b>	PC94			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>		

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. Whilst I understand the desire of the landowners to realise the profits such developments would release, the fact is that they would be the sole beneficiaries as there are only problems for Bratton village to come from this. It is wholly inappropriate in scale, outside of plan and/or plan requirements and would set a dangerous precedent for future planning abuse. They are bad in themselves and a Trojan horse for our future. I am 100% against these developments and hope to see them refused without possibility of the usual "wearing down" appeals.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	223	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 706349	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport. The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. a) Wiltshire Council are ignoring the Core Strategy, Core Policy, by seeking to develop housing outside the village boundary. b) The proposals are based upon completely incorrect data, as detailed above.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	224	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187637	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	225	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187638	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC16				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 16 and PC 17: Five Year Housing Land Supply [TABLE INSERT]</p> <p>1. Summary of our 5 Year Housing Land Supply objection: the proposed latest information (above) is contrary to NPPF (1) 6: Delivering a wide choice of high-quality homes with respect to both South Wiltshire and N/W Wiltshire. The Framework (1) now imposes a duty on Wiltshire Council to take steps to rectify the problem and not rely on a later review of the WCS (Wiltshire Core Strategy) that may take several years. 2. This DPD needs to provide now a reliable and realistic, planned 2018 - 2026, 5 Year Supply to deliver much needed homes of a type and tenure in the right place continuously. 3. Having more than a 5 years housing land supply (much better to have at least 7 or 8 years) also encourages commensurate with the amount - greater choice for consumers. This keeps house prices lower through competition. Having more than 5 years land supply is essential it brings greater surety and greater resilience, should one or more sites be delayed. To correct this flaw that is painfully obvious in PCs 16 and 17, more developable and deliverable land, in accordance with Footnotes 11 and 12 on p12 of NPPF (1) - must be brought forward from the list of Omission Sites etc. Benchmarks proposed revisions to PC 17 include: [TABLE INSERT] 4. PC16 and 17 are not legally compliant because: (i) they do not appropriately reflect guiding legislation; (ii) nor are they in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of highquality homes. 5. PC 16 and PC 17 Table 4.8 and supporting text are not sound because: (1) they are not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) they are not sufficiently justified; (3) they are not able to respond to change; and, (4) they are not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 6. We are asking the Inspector to amend PC 16 and PC17 and Annex A particularly the table (see above) and also the explanatory wording by allocating more land for housing in N + W Wiltshire (and South Wiltshire, too).</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

Please state which evidence document this representation relates to:		Please give details of why you support or do not support the updates to the associated evidence documents.	
Supporting documents (Please see Objective)	5129842		
Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?	No, the Proposed Change does not meet a previous objection		
Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.	Yes	Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.	Yes

<b>Comment ID:</b>	226	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187638	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC17				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 16 and PC 17: Five Year Housing Land Supply [TABLE INSERT]</p> <p>1. Summary of our 5 Year Housing Land Supply objection: the proposed latest information (above) is contrary to NPPF (1) 6: Delivering a wide choice of high-quality homes with respect to both South Wiltshire and N/W Wiltshire. The Framework (1) now imposes a duty on Wiltshire Council to take steps to rectify the problem and not rely on a later review of the WCS (Wiltshire Core Strategy) that may take several years. 2. This DPD needs to provide now a reliable and realistic, planned 2018 - 2026, 5 Year Supply to deliver much needed homes of a type and tenure in the right place continuously. 3. Having more than a 5 years housing land supply (much better to have at least 7 or 8 years) also encourages commensurate with the amount - greater choice for consumers. This keeps house prices lower through competition. Having more than 5 years land supply is essential it brings greater surety and greater resilience, should one or more sites be delayed. To correct this flaw that is painfully obvious in PCs 16 and 17, more developable and deliverable land, in accordance with Footnotes 11 and 12 on p12 of NPPF (1) - must be brought forward from the list of Omission Sites etc. Benchmarks proposed revisions to PC 17 include: [TABLE INSERT] 4. PC16 and 17 are not legally compliant because: (i) they do not appropriately reflect guiding legislation; (ii) nor are they in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of highquality homes. 5. PC 16 and PC 17 Table 4.8 and supporting text are not sound because: (1) they are not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) they are not sufficiently justified; (3) they are not able to respond to change; and, (4) they are not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 6. We are asking the Inspector to amend PC 16 and PC17 and Annex A particularly the table (see above) and also the explanatory wording by allocating more land for housing in N + W Wiltshire (and South Wiltshire, too).</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5129842		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

Comment ID:	227	<b>Consultee</b>  <b>Person ID:</b>  1187638	<b>Agent</b>  Director Benchmark Development Planning Ltd  <b>Person ID:</b>  894742	<b>Do you consider the Proposed Change to be legally compliant?</b>  No
				<b>Do you consider the Proposed Change to be sound?</b>  No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy
<b>Identify Proposed Change Reference Number</b>		PC3		
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 3 and Annex A Table 4.1 Housing Land Supply [TABLE INSERT]</p> <p>1. Because the latest completion and commitment figures (PC3) for North and West Wiltshire (and South Wiltshire) increase significantly the minimum to be allocated 2017 2026 (see 5th column above) the Authority (and now the Inspector) need to respond in a sound and responsible and timely way. 2. In the case of North &amp; West Wiltshire, plainly there is a need to allocate almost twice as much housing because 574 was the target to be allocated in 2017 and the Council now (September 2018) needs to identify a further 535 more houses to bring up the amount of housing to meet the minimum housing requirement up to 1,109. Wiltshire Council is not proposing to do this. 3. In our opinion, plainly the Council (and now the Inspector) must increase the amount of land to be allocated for housing in a commensurate way to meet need and ensure a 5-year housing land supply. (See also our comments regarding other proposed changes.) 4. Furthermore, the wording of the first column as Minimum to be allocated fails to indicate a likely acceptable range contrary to NPPF (1) 6: Delivering a wide choice of high-quality homes. NPPF (1) promotes flexibility and delivery through, inter alia, the use of an additional buffer (para 47). We are therefore asking the Inspector under Section 20 (7C) - because there are only about 7 years left until the end of the plan period (2026) - and given housing need - to identify sufficient land to come forward. It is reasonable to suggest a 5% range, on top of the minimum requirement. We set out below our proposed amendment to Table 4.1. For North and West Wiltshire, this means the target range to be allocated should be between 1,109 and 2,346 dwellings between 2017 2026. [TABLE INSERT] 5. Background argument: PC3 is not legally compliant because: (i) it does not appropriately reflect guiding legislation; (ii) nor is it in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of highquality homes. 6. The proposed change is not sound because whilst the numbers are factual, the Authority has failed to react to what the new numbers mean and therefore we say this draft document: (1) it is not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) it is not sufficiently justified; (3) it is not able to respond to change; and, (4) it is not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 7. We are asking the Inspector to amend PC 3, Table 4.1 and Annex A but particularly Table 4.1 (see our suggestion above) and the explanatory wording (our suggestions are in bold below): - factual update to table of figures to reflect the latest Housing Land Supply Statement published March 2018 (base date April 2017) and Section 6 of NPPF (1) .</p>			
<b>Please state which of the Sustainability Appraisal</b>			<b>Please give details of why you support or do not support the updates to the</b>	



<b>documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5129974		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	228	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187638	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC21				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objections to PC 21 and Annex A Table 4.11 Housing Land Supply and Annex J by Benchmark (Nov 2018) [TABLE INSERT] 1. Summary of our objection to PC 21: the proposed change indicates a significant shortfall in supply at Trowbridge (-19%) but hides key information about how big the shortfall is based on the minimum requirement. The column headings are also misleading. Finally, because of the shortage of developable land at Trowbridge (see our objections to PC3, PC 15 etc) the wording of the first column as indicative requirement is not the same as a Minimum to be allocated and so the shortfall is even greater than might appear to the reader of the table. In any event, in our opinion, PC21 fails to indicate a likely acceptable range contrary to NPPF (1) 6: Delivering a wide choice of high-quality homes. NPPF (1) promotes flexibility and delivery through, inter alia, the use of an additional buffer (para 47). 2. We are therefore asking the Inspector under Section 20 (7C) - because there are only about 7 years left until the end of the plan period (2026) - and given housing need - to identify sufficient land to come forward at Trowbridge and improve the 5-year supply of housing land. It is reasonable to suggest a 5% buffer see revised Table 4.10, next page. Trowbridge has a shortfall of between 1,297 and 1,638 new houses from 2018 2026 (!): [TABLE INSERT] 3. Background argument: PC21 is not legally compliant because: (i) it does not appropriately reflect guiding legislation; (ii) nor is it in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of highquality homes. 4. The proposed change is not sound because: (1) it is not sufficiently positively prepared with respect to the delivery of a surety of housing land supply for TROWBRIDGE; (2) it is not sufficiently or robustly justified; (3) it is not able to respond to change; and, (4) it is not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 5. We are asking the Inspector to address this shortfall in housing land at Trowbridge by amending PC 21 by including land at Staverton Triangle, Trowbridge that has a lapsed detailed planning permission for c. 65 dwellings and an outline residential planning application to renew that housing scheme with 2.1 ha of additional suitable alternative green space LPA ref: 17/10949/OUT: [TABLE INSERT] [APPENDED MAP] [APPENDED MAP]</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018)</b>		

<b>document this representation relates to:</b>		<b>or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5130008		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	229	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187638	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	SBR PC26				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objections to Trowbridge SBR PC 26 by Benchmark (Nov 2018) [TABLE INSERT]</p> <p>1. This Proposed Change raises a number of issues, not least because of the curious explanation for including land that is currently not built-on but on the edge of Trowbridge that is to be enclosed within the towns new settlement boundary (Sept 2018). We have underlined those words and phrases that have caught our attention Amend pre-submission settlement boundary to retain the existing settlement boundary and follow but not include(1) clearly defined physical features, such as hedgerows(2). This is recreational or amenity space at the edge of a settlement that relates more closely to the built environment(3) . 2. On the first point (1): follow but not include we assume this means that in the case of a hedgerow, tree belt, stream, road, railway line etc that the boundary is proposed to fall adjacent to but not over the top of that physical feature. If that is the correct interpretation, then that is acceptable. 3. (2) Hedgerows it follows that hedgerows are an example of a clearly defined physical feature and that there are of course several other features, such as tree belts, rivers/streams, roads, railway lines etc that also qualify as potential settlement boundaries. 4. (3) We support the inclusion of recreational or amenity space on the edge of settlements being included within settlement boundaries that relate more closely to the built environment . 5. Our concern with SBR PC 26 is this: those judgements have not been applied systematically and consistently, but it seems, just where interested parties have raised concerns. 6. Our clients land at Staverton Triangle (before our appointment) was regrettably not the subject of a detailed objection about the proposed moving of the settlement boundary. All that was said by Persimmon Homes in September 2017 in a valid objection to Wiltshire Councils WHAPS was: Persimmon Homes objects to the proposed removal of the land to the south of Blackthorn Way (Staverton Triangle) from the Trowbridge settlement boundary (grid reference I4). 7. However, what should have been said was that the proposed settlement boundary at Staverton Triangle will follow the existing settlement boundary and follow but not include the clearly defined physical feature of the railway. Staverton Triangle is land with a lapsed detailed planning permission for housing and is currently used as ad hoc and temporary recreational and amenity space at the edge of a settlement that relates more closely to the built environment . 8. The circumstances are very similar to the latest boundary changes (SBR PC 26) and therefore in the interests of consistency and the application of a systematic and fair boundary methodology, we are asking the Inspector to retain SBR PC 26 but amend the proposals plan and supporting text. WE asking that, once again, Staverton Triangle is recognised as being within Trowbridges settlement boundary. Afterall, that land is closely related to the built environment of Staverton and Trowbridge and</p>				

	not the cery separate open countryside (Green Belt) beyond the railway line, as the Inspector will see on his site visit. The follow plan indicates the amendment: [MAP INSERT] [MAP INSERT]		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5130025		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	230	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187638	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC15				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 15 and Annex A Table 4.7 Windfall and Housing Land Supply [TABLE INSERT] 1. Summary of our windfall objection: the proposed latest windfall allowance 2017 - 2026 in the 5th column seeks to increase the windfall allowance to try to fix the increasing housing land shortfall (see our objection to PC 3 etc). In our opinion, this is contrary to NPPF (1) that is titled 6: Delivering a wide choice of high-quality homes and also deals with windfall housing. 2. NPPF (1) para 48 promotes flexibility and delivery and warns Planning Authorities not to use an allowance for windfall sites unless the evidence is - realistic - reliable and - compelling. No such evidence has been submitted and those numbers should be viewed with caution. 3. Further, with the considerable tightening of all the main settlements boundaries and the exclusion of residential gardens, infill windfall brownfield housing cannot be a reliable supply: it is a dwindling asset. The forecast amount of windfall sites coming forward should be conservative, robust and reliable, not hopeful and optimistic (fingers crossed). 4. It is a very important point to note and in fairness to the Authority, Wiltshire Council do indeed (of course) concede this at para 5.7 of Topic Paper 3 (July 2018): the use of a windfall allowance should not be relied upon. 5. However, it is not realistic to say windfalls should be completely not relied upon. This is too extreme and contradictory a position for the Authority to take. Para 5.7 should be amended accordingly. 6. We are therefore again placing before the Inspector under S20 (7C) an invitation to correct this significant flaw and contradiction in the DPD and supporting paperwork. We are suggesting a simple, robust and reliable 4% windfall allowance (4% of the minimum housing requirement). In the context of our Objection to PC15, this means the windfall for North and West Wiltshire should be c. 990 dwellings rather than c. 2,210 between 2017 - 2026: [TABLE INSERT] 7. Forgive the complexity of the next table, but we have applied the 4% windfall to Table 4.7 whilst also taking into account our objection to PC 3 regarding the need to allocate more housing land and identify a housing requirement range, rather than an absolute minimum [TABLE INSERT] 8. Background argument: PC15 is not legally compliant because: (i) it does not appropriately reflect guiding legislation; (ii) nor is it in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of highquality homes. 9. The proposed change in Table 4.7 is not sound because: (1) it is not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) it is not sufficiently justified; (3) it is not able to respond to change; and, (4) it is not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 10. We are asking the Inspector to amend PC 15 and Annex A and particularlybTable 4.7 (see above) and also the explanatory wording at Para 5.7 of The Topic Paper 3: HLSA (July 2018).</p>			

<p>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</p>		<p>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</p>	
<p>Please state which evidence document this representation relates to:</p>		<p>Please give details of why you support or do not support the updates to the associated evidence documents.</p>	
<p>Supporting documents (Please see Objective)</p>	5130028		
<p>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</p>	No, the Proposed Change does not meet a previous objection		
<p>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</p>	Yes	<p>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</p>	Yes

<b>Comment ID:</b>	231	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187642	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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Comment ID:	233	<b>Consultee</b> <b>Person ID:</b> 1187644	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b> Yes
				<b>Do you consider the Proposed Change to be sound?</b> No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy
<b>Identify Proposed Change Reference Number</b>		PC94		
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>		

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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Comment ID:	234	<b>Consultee</b> <b>Person ID:</b> 1187645	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b> Yes
				<b>Do you consider the Proposed Change to be sound?</b> No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy
<b>Identify Proposed Change Reference Number</b>		PC94		
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>		

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	235	<b>Consultee</b> Planning Officer North Dorset District Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1135279		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [General]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	North Dorset District Council has responded to consultations on this proposed DPD in June 2016 and September 2017. These comments relate to the potential need for allocating a site for development in Wiltshire to meet the needs of Shaftesbury (a town in our District). The present consultation appears to be a series of modifications to the submitted DPD (we note that the consultation consists of 50+ separate PDFs). NDDC assumes that if there is anything in this consultation that would likely have an impact on the District then Wiltshire Council would draw our attention to it and seek meaningful consultation under the duty to cooperate. Otherwise, we have no further comments to make.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	236	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1129817	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Bratton is situated on the edge of the largest continuous expanse of unimproved chalk grassland in NW Europe, it is also one of the most important wildlife sites in lowland Britain. Please don't destroy it by excessive and unnecessary development when it appears that Wiltshire Councils own housing development policy has not only been met but exceeded in this area.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	237	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1182628	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	SBR PC41				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>I write to object in the strongest possible terms to the proposed settlement boundary extension at Winterslow Map Grid References F5, F6, G5, G6 Amend settlement boundary to include the entirety of the garden of Beechwood within the settlement boundary . The proposed change directly contravenes the settlement boundary review methodology, which states that areas excluded from the review include Curtilages of properties which have the capacity to extend the built form of the settlement. This includes large residential gardens (TOP.01 Topic Paper 1 - Settlement Boundary Review Methodology, July 2018). This was correctly recognised in the Officer response to representation numbers 381 and 382 in Appendix P of the Wiltshire Site Allocations Plan Consultation Statement Regulation 22 (1) (c). Here (p. 424) the Officer confirmed that the inclusion of the entirety of this garden would substantially extend the built form of the settlement in terms of scale and location and that No action should be taken, i.e. the settlement boundary should not be amended to include the entirety of the garden of Beechwood. None of the above has changed during the most recent consultation and revision period and so this change should be rejected. Though it should have no bearing on the Wiltshire Housing Site Allocations DPD, it may also be helpful, in light of representation numbers 381 and 382 referenced above, to note that the site approximated by that indicated at Winterslow Map Grid References F5, F6, G5, G6 was deemed, in December 2017, undeliverable by the Winterslow Neighbourhood Plan steering group. As a result, the site was removed from the developing Winterslow Neighbourhood Plan.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	238	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187696	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the change to remove the site designated at Crudwell due to the completions wider in the Malmesbury area and due to the good progress made in the wider neighbourhood plan to allocate suitable sites.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	239	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187701	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the removal of the Ridgeway Farm site allocation from the Wiltshire Site Housing Development Plan Document (DPD). I consider the consultation material to be sound and legally compliant. The removal of the Ridgeway Farm site allocation will specifically address my concerns regarding; the scale of the proposed site, planning policy together with environmental and infrastructure impact. Generally, I support the removal on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

Comment ID:	240	<b>Consultee</b> <b>Person ID:</b> 1187707	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
					<b>Do you consider the Proposed Change to be sound?</b>
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	CP94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	241	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187701	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the removal of the Ridgeway Farm site allocation from the Wiltshire Site Housing Development Plan Document (DPD). I consider the consultation material to be sound and legally compliant. The removal of the Ridgeway Farm site allocation will specifically address my concerns regarding the requirement for the development and the impact on the infrastructure of the village. Generally, I support the removal on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	242	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187708	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. Mindful of the analysis above, the need for transparent decision making, personal accountability and the forensic examination to which decisions will be subjected, I urge Wiltshire Council to reconsider its plans for new housing in Bratton. As things stand, it seems that all those involved in Wiltshire Councils decision making process deem Brattons Neighbourhood Plan Steering Groups points to be invalid and can presumably state authoritatively why that is so. I disagree with their apparent view. Please note these points and reconsider. Thank you.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	243	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187709	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. I particularly object to the proposed which it will constitute a suburban aspect to the western approach to what is in effect a rural village.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	244	<b>Consultee</b> Senior Planner Oxfordshire County Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187710		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	According to our records, we have not made any comments on your Site Allocations DPD to date. Please let me know if this is incorrect. On the basis that we have not commented to date, and the modifications appear unlikely to have introduced anything of particular interest to Oxfordshire County Council, we are not planning to comment.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Comment ID:</b>	245	<b>Consultee</b> Chairman East Boreham Residents Action Group (EBRAG)	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 706891		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC76				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>The local community believe that the H2.7 East of Dene (Home Farm) site should be removed from the proposed DPD. The reasons are attached by separate sheet to the document. [see below]. The views represented in this paper are that of the local East Boreham community submitted on their behalf by the East Boreham Residents' Action Group (EBRAG). The aim is to ensure that development in and around East Boreham is sustainable. EBRAG formed in 1980, but still retains an active, experienced and knowledgeable committee, a data base of some several hundred concerned residents and a website (currently being reconstructed) with over 7,000 hits. EBRAG has held several well attended public meetings, regularly updates local residents on the current situation through email and leaflet drop and has the backing of the local county MP, ward town councillors and clearly the local community. EBRAG has submitted many representations on the Wiltshire Council websites against a speculative development application 16/10502/OUT and the original proposed Wiltshire Council Spatial Planning WHSAP/20 for site H2.7, dated 22nd September 2017. These documents should be read in conjunction with this further submittal. The community feels that the proposed revised changes to PC76, PC77 and PC:78 within the WHSAP for Housing Allocation H2. 7 does not adequately reflect the many representations and specific concerns made on this proposed allocation during the initial and subsequent consultation. The Wiltshire Council changes only repeat the policies in the National Planning Policy Framework (NPPF) that a Planning Authority would be required to follow. The Regulation 22 (1) (c) Report Consultation Statement Appendices M -P (Paragraph 21.74) indicated that 64 representations were received and documents the Wiltshire Council response. The following paragraphs highlight the local communities continued concerns with the lack of proposed changes following that representation. Landscape/ conservation Issues Issues raised Disagreement over potential landscape/conservation impacts and the suitability of parts of H2.7 site to be developed. Wiltshire Council Response Assessment of H2.7 site and the raised concerns by Wiltshire Council officers has led to the conclusion that development should be located primarily within the northwest part of H2.7, where landscape and conservation impacts can be more effectively mitigated. Proposed change by Wiltshire Council following representation None. EBRAG comment The conclusion from the 2017 Landscape Assessment Part stated - "The site contributes to the setting of Bishopstrow Conservation Area, Battlesbury Hill and south eastern edge of Warminster. There are also views through the site from the local PRoW network north towards Battlesbury Hill and south towards the treed Bishopstrow Conservation Area. It would be difficult to mitigate the removal of these features should the site be developed. However, proposed development would be less constrained in the north west of the site due to the proximity of existing development and the lower sensitivity in terms of wider landscape setting and views. Boundaries to development could be planted with groups of trees, copses and individual specimen trees to help mitigate the effect on landscape character and views. The</p>				

northern, south western and eastern parts of the site would be more sensitive to development due to the proximity of the Conservation Area and views north towards Battlesbury Hill. The overall capacity to accommodate change would be moderate -/ow". The Landscape Assessment does not consider the views from Battlesbury however the Heritage Impact Assessment does indicate a potential for - "setting change to Battlesbury Camp hillfort (SM) in vistas to the south from the monument". The landscape associated with this site has not changed since the Planning Inspectors Report into the West Wiltshire District Plan in 2004 who, when considering the location of Warminster's Settlement Boundary, commented - "/ saw that the land mostly comprises arable fields, with similar fields to the north, together with a few cottages and other houses (some set in trees) and bounded by lanes or roads, to the east, west and south. Although there is urban development immediately to the west (across Grange Lane), the area has a pleasant and obviously rural appearance and is very much on the edge of Warminster. From my observations from local footpaths to the north, west and east of the area and from Battlesbury Hill, I consider that the land relates well in visual terms to the open countryside to the north and east, forming an integral part of the countryside east of the town. I accept that a high stone wall and cottages fronting Boreham Road impact on any meaningful visual relationship with the countryside to the south, other than when seen from the Hill top. However, in view of the open-ness of the land and its linkage with other open land to the east and north (and especially Battlesbury Hill), I consider that the town policy limit hereabouts should be drawn along the eastern edge of the denser development fronting The Dene, St George's Close and (the southern part of) Grange Lane". The current Heritage Impact Assessment (LUC) provides a much more comprehensive and detailed assessment including the effects of limiting development in the north. This document details much more significant effects than were considered by the Sustainability Analysis and therefore should be reviewed in entirety before any decisions are reached. River Avon SAC Issues raised The need to protect biodiversity (River Avon SAC and 5551, local wildlife). Wiltshire Council Response Additional wording is proposed to be added to the supporting text to ensure that the policy adequately addresses the need to protect the River Avon SAC. EBRAG Comment Although Wiltshire Council Response indicates that a wording change is proposed, EBRAG cannot identify any change in PC76, PC77 and PC78 that relates to change. The main problem affecting the River Avon SAC is phosphate concentration. To this end Wiltshire Council has a Nutrient Management Plan (NMP) to identify appropriate and proportionate mitigation measures. However, the Planning . Officer's report on application 17-01463-FUL to the Strategic Planning Committee 15th August 2018 stated - "The aim of the NMP is to bring phosphate concentrations in the River Avon SAC down to the conservation targets set by Natural England in order to bring the river system into a favourable condition. This is a requirement of the Habitats Regulations. The underlying premise of the Plan is that increases in sewage derived phosphate would be more than offset by reductions from DEFRA's catchment sensitive farming {CSF} initiatives. However, at the beginning of 2018, Natural England and the EA reported that CSF has been much less effective than that which was projected by the NMP modelling and is unlikely to satisfactorily offset the increased level of phosphates from new development". Surface water flooding has been reported many times on the East of Dene site (H2.7), to the west in Grange Lane, to the south along Boreham Road and principally around the Sutton Veny roundabout. This combined with the less effectiveness mitigation is likely to increase the phosphate concentration in the River Avon. Wiltshire Council have yet to successfully manage pollution of the River Avon with respect to the current planning approvals and should not be proposing further harmful development at this time until a SFRA level 2 is completed. Flooding Issue raised Flooding issues on the site and in the local area and the lack of SFRA Level 2 or Surface Water Management Plan. Wiltshire Council response The proposed allocation is located within Flood Zone 1. The Environment Agency has no objection in principle. Any proposals for development of this site should be informed by a site-specific flood risk assessment which should inform design, layout and any mitigation measures required. Proposed change Give greater emphasis to flood and drainage requirements through site specific assessments. EBRAG Comment The only way Wiltshire Council can achieve its legally required duty of managing all forms of flooding in combination across the county is to understand the causes of all floods, record the extent of flooding, where the problem areas are and then devise a strategy to manage these issues. Current national flood risk management policy requires councils to undertake high level flood risk assessments (SFRA 1) and use these to highlight areas needing further assessment; Warminster has been highlighted as needing more. Using the historic flood records and additional flood assessments undertaken in high risk areas such as a SFRA 2,

surface water management plan, flood risk asset maps and floodplain extent maps, Wiltshire Council can then devise an adequate flood management strategy. This has yet to occur. Without the required SFRA 2, or associated supporting plans, Wiltshire Council has (like in Watermead Parish) broken national requirements and proceeded without undertaking an adequately detailed sequential test. Does this make the current development site selection for Warminster illegal? The EA and Wiltshire Council came to a legal understanding when finalising the Core Strategy called a Main Modification which meant the EA would not stop the whole Core Strategy by objecting, only if Wiltshire Council agreed to do the required SFRA 2. This was intended to increase Wiltshire Councils understanding of flood causes in Warminster to ensure safe site selection, which is a legal requirement. The cause of flooding comes from Zones 1 and 2 overwhelming the known limited capacity of the flood infrastructure and the amount of space left in Zone 3, the floodplain, due to previous developments and the addition of flood assets like culverts, bridges and sluices. These increase flood risk across the area but the location and effects have not been mapped yet. Wiltshire Councils response to the issues raised are that the areas being put forward are in Zone 1, the developers will do sufficient flood risk assessments and that the EA will not object. This fails to recognise the EA have a standing objection that Wiltshire Council doesn't have sufficient flood info to make site selection decisions. Developers assessments therefore, when completing their flood risk assessments, will also be based on inaccurate data, so any flood management strategies are extremely suspect. Heritage Assets Issue raised Potential harmful impacts on heritage assets (including Bishopstrow Conservation Area and listed buildings surrounding the site). Wiltshire Council Proposed change. Heritage Impact Assessment to ensure appropriate consideration is given to the significance of heritage assets and their settings. EBRAG Comment The proposed changes do not adequately reflect the comment (ID 1646) from Historic England - "There is a risk to the significance of several affected heritage assets including a Conservation Area, listed buildings and the wider historic landscape setting. No doubt this site will be of considerable archaeological interest. Is the local authority able to confirm it is satisfied that it is appropriate to undertake an archaeological assessment at the application stage that would allow an appropriate response where necessary as a result of the findings? See relevant national policy. Greater certainty/clarity is required re the degree of harm; the strategic layout and form of future development in response to this context. This is sensitive site and difficult to access and as it is a pivotal issue in relationship to the principle it needs to be resolved at the Plan stage and not left to any future application. A field boundary/Jane divides the site north south and is a strong characteristic feature". The Wiltshire Council proposed changes only reflect the actions that would be carried out for any development site to designated and non-designated heritage consistent with national policy. It does not reflect the quantity of heritage assets affected, archaeological interest, historic setting and the degree of harm that development would produce. As stated by Historic England in their comment this is a sensitive site. The local community have repeatedly suggested extending the Bishopstrow Conservation area from the east of the site to cover the south west and eastern area of the site to protect against future development. Infrastructure Issue raised Concern over infrastructure capacity (including Education and Health). Wiltshire Council response towards Education While local school capacity is noted as problematic, primary school expansion is possible. Wiltshire Council Proposed change None. EBRAG Comment The Wiltshire Infrastructure Delivery Plan (dated September 2013) indicated the essential infrastructure need was - "Relocation of Kingdown Secondary School to provide an additional 241 pupil places. Some surplus places but forecast to be full by 2014/11 The Wiltshire Infrastructure Delivery Plan (dated December 2016) indicated the essential infrastructure need was - "Site (at least 3.6ha) to co-locate additional secondary places within West Urban Extension to provide 309 places. Some surplus places but full by 2018. Not able to expand. No land nearby. Land required on strategic site. 11 (Note: emphasis in bold in original Wiltshire Council document). The Planning Officer's Report to the Strategic Planning Committee (15th August 2018) for planning application 17-01463-FUL states that- "In terms of secondary school infrastructure, the only designated non-private local secondary serving Warminster is Kingdown Academy which has PAN (years 7-11) capacity of 1,385 places. As of October 2017, the number of year 7-11 pupils on the roll amounted to 1,310 pupils and it is forecasted that the number of pupils will increase to 1,335 by 2023. As is the case with the local primary schools, there are other registered/consented residential developments in the community area that would take up the nominal spare capacity at the Academy which has limited potential to expand at the existing site". At the Warminster Town Council meeting (22nd May 2018) to discuss planning application 17-

01463-FUL, Town Councillor Brett, Chair of the Kingdown Academy, stated that he was unaware of any approach made to the school about future provision to meet requirement. He also stated that there were no plans for Kingdown Academy Year 7 group to be moved to a different site. Wiltshire Council response does not address the well-known infrastructure problems associated with secondary education in Warminster. The capacity problems of secondary education in Warminster has been well documented before the original Core Strategy examination in 2013 and Wiltshire Council have yet to demonstrate any progress to mitigate in the last 5 years. Wiltshire Council response towards provision of Health Provision The Wiltshire Infrastructure Delivery Plan {dated September 2013} indicated the essential infrastructure need was- "£Potential relocation of existing GP practice and improvements to existing practices in the villages. Most practices are full to capacity". The Wiltshire Infrastructure Delivery Plan (dated December 2016) indicated the essential infrastructure need was - "Support development of local primary healthcare facilities. Meet impact of new housing of local practises, which are already undersized for the current number of current patients". (Note: emphasis in bold in original Wiltshire Council document). Since the Wiltshire Core Strategy was approved, the number of GP Practices in Warminster have decreased from 2 to 1, with the closure of the Smallbrook Surgery in September 2017. An outline planning application has been approved for the WUE in June 2018 which does include a new medical centre, however this is not supported by NHSE of the CCG and so has yet to materialise. EBRAG Summary By failing to address raised concerns or propose solutions to either the education or health infrastructure, deemed essential for development in Warminster in the Core Strategy in 2013, Wiltshire Council have not adequately explained how further additional housing in Warminster can be proposed without the relevant infrastructure issues being addressed and mitigated. Access Issue raised Concerns over highways and access impacts. Wiltshire Council response Evidence indicates that the local highways network is capable of accommodating the number of dwellings proposed and that Highways consider access could be achieved. Wiltshire Council Proposed change None. EBRAG Comment Wiltshire Council proposed access to H2.7 from Boreham Road, now reclassified as a B road, however the speed of traffic in both directions remains significant as cars accelerate leaving or start to slow to enter, Warminster. This is directly opposite the proposed access entrance. Anyone standing on the blind bend just short of the proposed Boreham Road entrance to the site, witness cars regularly driving well above the speed limits. The local community remains concerned that since this is the only proposed access to the site, there will be a high risk of accidents occurring at the proposed entrance just after a blind bend. The final Heritage Impact Assessment (LUC) dated March 2018 described in its predicted effects for the access from Boreham Road as- "11/f access is taken from Boreham Road, development will result in loss of at least one section of historic walling. This would result in setting change to the Bishopstrow Conservation Area as the wall currently provides a strong visual and historic boundary for the CA -in addition to making a strong positive contribution to the character and appearance of the CA". It goes on to say in the options for sustainable development that - "limited development could be accommodated in northwest corner of the site. This, in parallel with strengthening existing landscape structure, would avoid adverse setting change to key heritage assets". Access would need to be secured from the existing road network in The Dene, or via other means of access to the north, to avoid issues set out above. Although Wiltshire Council have accepted the overall conclusions from this document and limited the development to the northwest part of the site, they have ignored the effects of setting change due to access from Boreham Road. Wiltshire Council have not provided any explanation as to the reason that the option of access from the north has been ignored. Employment. Issue raised. Concern over lack of local employment opportunities. Wiltshire Council response. Due to the close location of Warminster, a Market Town and the proximity of the site to existing bus networks, the site is considered to be in a reasonably sustainable location. Proposed change. None. EBRAG Comment The underlying principles of the Wiltshire Core Strategy (Policy CPI) seek to manage future development to ensure that communities have an appropriate balance of jobs, services and facilities and homes. The strategy recognises that previous growth hasn't always been delivered in a proportionate manner, whereby housing is delivered in settlements where there are insufficient employment opportunities leading to out-commuting. This is the primary reason why the Warminster West Urban Extension (WUE) is a mix of housing, employment land, primary school, local amenities etc. H2.7 is purely a housing development and does not meet the principles of the Core Strategy in providing balanced facilities that are needed for a self-contained community. H2.7 does not provide additional employment area and so for new local

	<p>employment, relies on the employment area being developed to support the needs of the WUE. Wiltshire Council and Warminster Town Council have both recognised that Warminster is unusual in that more people commute out of town for work than are employed within the town boundaries. The main towns for employment near Warminster are Bath, Westbury, Trowbridge, Freme and Salisbury. With the exception of Salisbury, all of these would involve households from H2. 7 commuting through Warminster Town Centre. It therefore will contribute to Warminster's existing current traffic problems at peak times. EBRAG Overall Conclusion. Given the above information on landscape, pollution, flooding, heritage assets, infrastructure, access and employment the local community feel that if the sustainability assessment was repeated for this site against the objectives, it would have produced a different result. The site would have been classified as having major adverse effects and so would not have been considered suitable for selection. The local community believe that the H2.7 East of Dene (Home Farm) site should be removed from the proposed plan.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	246	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1129546	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. 1) Massive local developments makes nonsense of the few homes proposed for Bratton. As a family, we have lived opposite site 231 for nearly 40 years and several attempts to trade the farmland for building have, thankfully, come and gone. 2) It is more important to address the volume of peak time traffic using the B3098 as a 'rat run'. It is almost like having a single lane motorway, with very little in the way of traffic control. Any new development would merely exacerbate this chaotic situation. 3) Bratton has a brilliant surgery which is becoming inundated.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			



<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	248	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126042		<b>Person ID:</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified	
<b>Identify Proposed Change Reference Number</b>	PC72				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[ORIGINAL COPY OF REPRESENTATION ATTACHED] Representations relating to the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan I refer to you letter of 25 th September 2018 concerning the above matter and wish to submit the following observations. These relate to Site 3565 land at Southwick Court. I challenge the soundness of these changes because they cannot be justified on the basis that the amended plan related to Southwick Court is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence. Put simply, Wiltshire Council (Spatial Planning Dept) has at long last acknowledged the historical importance of this site which encompasses Southwick Court itself, together with the surrounding water meadows upon which building land at Site 2565 has been included in the Plan. The Schedule of Changes states that the changes have been made in response to comments from Heritage England , without reference, I would add, to any representations from members of the public presented in the 2017 consultation process, including myself, regarding these very important heritage assets. Clearly nobody else counts in the minds of the planning officers! In particular, the historical significance of the setting of the medieval manorial farmstead, namely the water meadows surrounding it, as well as the farmstead itself, individually and collectively, have been acknowledged as significant heritage assets . Yet the Council has still retained this site within its Housing Plan to allow building on the water meadows to the east of Lambrok Stream, i.e. Site 3565, very close to Southwick Hall, even though it acknowledges in the Schedule of Changes that some harm may ensue to these heritage assets from any future planning application. There are all sorts of caveats within the Schedule of Proposed Changes, clearly put in place to pacify the concerns of Heritage England, but this wording still indicates that some harm to these heritage assets would be permitted providing it is not substantial and that there is convincing justification for it . Thus, despite the caveat there is no escaping the fact that the Council , by its insistence upon allowing building development on this site, is prepared to allow some harm to occur to this nationally important heritage site by reason of its rarity , due to the water meadows still being intact, which surround the medieval farmstead. It is not reasonable to allow this to happen to such an important heritage site and landscape. The obvious solution would have been for the Council to remove Site 3565 from its Housing Site Allocations Plan , thereby preserving these heritage assets, including the landscape setting from any possible harm. This is the most reasonable alternative for such a precious heritage asset and its setting. The Plan in relation to this proposed building site at Southwick Court is therefore not justified and thus unsound. Early in the appraisal process this site was considered less sustainable in the area of search, which would have been the right decision then , bearing in mind the position of the medieval farmstead which was known to the Council, and should have been removed from the Plan at that time . That early decision , i.e. the site being less sustainable has now been endorsed by the</p>				

	<p>Councils belated acceptance of these heritage assets including the setting of the water meadows, as of significant importance , and demonstrates that the Plan is not sound because it is not justified . My other concern in relation to the proposed changes is the suggestion that land to the west of Lambrok Stream (i.e. water meadows), whilst not to be used for housing, could be used as formal or informal open space or remain in agricultural use . These water meadows are clearly in agricultural use now and always have been since Southwick Court Farmstead was built, and it is glaringly obvious that that their heritage integrity as water meadows as part of the farmstead will only be maintained by remaining as agricultural land , with the existing ancient footpaths, as shown on the Definitive map, available to people who wish to walk on them, as has always happened. Formal or informal open space has never been part of the setting of Southwick Court and clearly cannot be justified , to the detriment of these water meadows which complement the setting to Southwick Court. This again demonstrates that the Proposed Changes to the Plan are not justified , and therefore not sound , and this site should be removed from the Plan, because it is an unreasonable strategy. When this letter is published online I would like it to be shown as set out in this letter, and not broken up under your own headings, as originally happened to my representations for the 2017 consultation. It ended up as unintelligible gobbledegook, which I asked to be removed and my original letter published (which was done in typed format, produced by your department, and checked by me). These representations on the soundness of the Schedule of Proposed Changes contain legal arguments which would be completely compromised if broken up for your own purposes. If a summary of main issues is again produced for this consultation I would expect these representations to be on it to reach the attention of the Inspector, because there can be no doubt that any arguments raising the issue of soundness must be a main issue , because of the consequences if the Inspector finds those arguments to show that all or part of the Plan is not sound .</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5131404</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			

<p><b>proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	249	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 704825	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	250	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187713	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	251	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 871876	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC78				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>This whole process has been done in such a way as to obscure and hide the real issues in Warminster by repeatedly changing the assessment criteria used in producing both the DPD and the SA. In 2004 the EA highlighted the high flood risk in Warminster due to the steep topography, multiple flood sources, many unmanaged flood risk assets, a lack of flood storage area and a lack of knowledge on the capacity of the flood infrastructure and river system used to manage flood risk across the town. Due to this lack of understanding during the Core Strategy and at every consultation since the EA have pointed out the need for a Sfra 2 covering all Warminster to understand the causes and solutions to flooding. It was such an issue that the EA and council as well as the Core strategy examiner added a main modification and explanatory note to the core strategy stating that the West urban extension could proceed but any further developments must show how they are able to manage flood risk with reference to the details in the SFRA 2 and surface water management plan to ensure flood risk is adequately controlled. This has not been done and sites are simply asked to produce flood risk assessments based only on current flood information which as stated by the EA is insufficient for safe site selection. Only by mapping the extent of the floodplain, the impact of flood assets, the areas already effected by flooding and the causes, and the required solutions would it be possible to state which sites had the most flood risk and which sites cause the most flooding. So without any accurate details the council has approved 4 sites in zones 2 and 3, prior to any town wide assessment and in addition to the already approved West Urban Extension. Now the aim is to add more sites without the required assessments. The NPPF is clear that all sites must pass the sequential test, the SFRA1 for Wiltshire reaffirms this yet no site put forward has a sequential test document to prove it complies with the legal requirement for one. The only way to do a sufficiently detailed Sequential test is to understand flood risk in each area, what causes it and as highlighted in the updated NPPF what the in combination effect of all flood sources and causes will be. To know this an up to date flood asset map, floodplain extent map, surface, river and ground water flooding extent and expected increases in flood maximums caused by current and future developments and the effects of climate change is needed. With the steep valleys, limited floodplain multiple flood sources of ground surface and river flooding, and plenty of flood risk assets ranging from lakes, culverts, screens, bridges, roads, sluice gates etc being mainly unmanaged or maintained all acting in unison to increase flood risk and extent especially across the vital emergency access routes the roads and no accurate understand of how each risk interacts any flood risk assessment will not highlight the actual risks or provide effective solutions.</p>			

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	252	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Main Report (EXAM/02A)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p>The sustainability appraisal is required to assess the relevant issues effecting each area and highlight theses issues and how they will be dealt with yet repeatedly the document provides conflicting information that does not reflect the actual issues related to the area.</p> <p>It states only Trowbridge and Salisbury are being looked at for flood issues and states these are mainly river flooding. This contradicts the local flood risk management strategy which highlights that Salisbury and Trowbridge have each got over 1000 properties at risk of surface water flooding. The report fails to mention that Warminster also has over 1000 properties at risk from surface water flooding. Considering Wiltshire has</p>				

<p><b>Assessment Addendum (September 2018).</b></p>	<p>over 16000 properties at risk of surface water flooding and is one of the highest risk areas in the country for this flood source according to the NAO it seems strange that this issue is not highlighted in the report.</p> <p>The appraisal claims to use set criteria for assessing sites but it does not refer to the SFRA 1 document and the requirement for all sites selected in the DPD to pass the sequential test.</p> <p>Also strangely absent is the EA advice that Warminster is at high risk of flooding from many sources, and that a SFRA 2 and surface water management plan are required to ensure safe site selection.</p> <p>The SA ignores and fails to mention the main modification in the core strategy for Warminster in which the previous examiner, the EA and Wiltshire council agreed that the only safe way to proceed was to do the West urban extension first but that any additional sites must show how they have complied with the sfra 2 and reduced flood risk accordingly. To state that site specific flood risk assessments will be sufficient when the data they are using refers only to their site and not the impact to the wider community shows this is not sustainable. Each site will have no idea of the town wide issues, what cause them, if the system has enough capacity or what the in combination effects might be. These questions can only be answered by more detailed flood assessments such as SFRA 2 etc which then feed into site specific flood management strategies, this has not been done so the conclusions are false as shown by the statement that me development is within 20m of the river when this will be the case on 304, and is already true on the beeline site which is potentially deadly.</p>		
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	253	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187717	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	254	<b>Consultee</b> Senior Planning Officer Dorset County Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 634998		<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [GENERAL]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	DCC considers that the consultation material is sound and legally compliant and do not wish to add any comments.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	255	<b>Consultee</b> New Forest National Park Authority	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 382305		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Update to Habitats Regulations Assessment Addendum (September 2018) (EXAM/03)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p>Thank you for consulting the Authority on the above documents. On behalf of the Authority I would like to take this opportunity to make the following comments.</p> <p>The Authority would like to take this opportunity to reiterate the comments and concerns made on the Local Plan Review Consultation Paper November 2017 (our letter dated 19 December 2017 refers). The Authority considers that Wiltshire Council needs to address impacts on the protected habitats of the New Forest through ensuring that adequate habitat mitigation measures are in place as outlined below.</p>				

<p><b>Assessment Addendum (September 2018).</b></p>	<p>The Authority is aware that a New Forest Mitigation Strategy referred to in paragraph 6.77 of the adopted Core Strategy (January 2015) hasn't been produced to date. It is stated in paragraph 6.77 that;</p> <p><i>'Wiltshire Council will support the production and implementation of a New Forest Mitigation Strategy in partnership with Natural England and other partners as appropriate. This will set out the delivery mechanisms and funding requirements (through either CIL, S106 or other appropriate mechanism) such that impacts of the plan upon the New Forest SPA are fully mitigated. After adoption the New Forest Mitigation Strategy will be a relevant planning consideration. Prior to this, planning applications will be subject to individual HRAs and bespoke mitigation secured as necessary.'</i></p> <p>As previously mentioned, mitigation strategies have been in place for planning permissions granted by the National Park Authority and New Forest District Council since 2012 and 2015 respectively (and more recently Test Valley Borough Council) and it was suggested that these could provide a useful starting point for any discussions on the production of a mitigation strategy in line with Wiltshire Council's obligations under the Habitats Regulations. In the longer term there is a clear need for local planning authorities around the New Forest to adopt a more strategic cross-boundary approach to habitat mitigation measures, to ensure each local planning authority complies with the requirements of the Habitats Regulations and Wiltshire Council's current involvement in the on-going research project along with other partner local authorities is welcomed.</p> <p>Notwithstanding the above however, in the absence of a current mitigation strategy it is unclear how the housing allocations proposed in southern Wiltshire, which may have an impact on the New Forest protected European sites, <u>have been</u> (if already developed) and <u>will be</u> mitigated against (as they come forward for development). As such without provision for mitigation both in the recent past and moving forward, the Plan as currently drafted, fails to comply with the Habitats Regulations</p>		
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	256	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126309	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC72				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Wiltshire Housing Site Allocation Plan Opposition to Site 3565 For the attention of the GOVERNMENT INSPECTOR Throughout the planning process Wiltshire Council has consistently broken a number of its Core Policies and ignored legislation and governmental agencies reports and recommendations directly pertaining to Site 3565. There has been widespread public condemnation of Site 3565 from the local community. Factual supporting evidence supplied by members of the public containing reports from government agencies directly linked to the site has been disregarded throughout the consultation process. Submissions made by the public as part of the process have been significantly edited by Spatial Planning in its final publication. Trowbridge Council has consistently opposed all plans to develop the site. Despite an exhaustive list of significant arguments backed and reinforced by government legislation against the development of 3565, the site remains in Wiltshires Housing Site Allocation Plan. Arguments against the development of Site 3565 with supporting evidence are as follows: The site has been widely recognised as an area of archaeological landscape of considerable importance. Furthermore, Natural England in possession of the full facts pertaining to the site, concluded, we advise that the plan is unsound. The proposed development is adjacent to important heritage sites and recognised by government agencies as being of significant importance. Trowbridge Council and Parish Councils, notably Southwick and North Bradley have consistently opposed any proposal for development. Moreover in Wiltshire Councils Core Policy 29 and the supporting text (paragraph 5.150) of the WCS, it clearly states that surrounding villages should have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. Development of the site would contravene this policy and neighbouring villages would merge with Trowbridge thus losing their distinct individuality affording no separation in its outcome. Site 3565 has been recognised as of significant importance as referenced in the Listed Buildings and Conservation Areas Act 1990, as it encompasses the Grade 11* Listed Southwick Court Farm and farmstead with its medieval moat and post medieval water meadow system. The 1990 Act gives special regard when considering land for development and the need to take account of the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (S16 and 66). Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation. Significance can be harmed or lost through development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Core Policy 58 of the Wiltshire Core Strategy echoes the above national policy in seeking the protection, conservation and, where possible, enhancement of listed buildings. Any development of the site would significantly undermine the integrity of the listed buildings and archaeology and subject it to significant harm. Southwick Court lies immediately to</p>			



the south of the proposed development. The County Planning Archaeologist reported in June 2017 that by putting 180 houses will have an impact on a number of heritage assets. The preservation and conservation of the site has already been significantly compromised in recent years by the installation of a Solar Farm. This has already impacted on the managed landscape and associated buildings related to the heritage site. Recommendations, findings and conclusions documented in a Sustainability Assessment Heritage Impact Assessment of the site have been ignored by Wiltshire Council. The report concluded by highlighting The designated assets are of high importance, reflecting their national significance Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation. Significance can be harmed or lost through development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Core Policy 58 of the Wiltshire Core Strategy echoes the above national policy in seeking the protection, conservation and, where possible, enhancement of listed buildings. Bramble Farm sits within Site 3565 under a tenancy arrangement. Cattle graze on the fields and winter feed is an invaluable by product that ensures the farm is economically viable. Development of the land would make the farm unsustainable by removing fields that provide essential winter feed. The site has historically provided recreational and leisure pursuits for the local community. Three public footpaths are officially recognised on OS maps and an additional two are in the process of being added as they meet the criteria for being in use for an excess of thirty years. Wiltshire Core Policy clearly states that public rights of way network will be protected from development for other land uses Development of the site would directly impact on the landscape potentially blocking or removing public footpaths and rights of way. This clearly contravenes Wiltshires Core Policy. In addition, Natural England has stated that they are unsure how the arguments surrounding public rights of way, open spaces and common land have been duly considered in Wiltshire Councils Planning Allocation Plan. Site 3565 encompasses hedgerows that fulfil the criteria of Important as set out in the 1997 Hedgerow Act. The hedgerows date back to at least 1795 as can be evidenced on an Andrews and Dury map of Wiltshire dating back to this year. Development of the site would necessitate cutting through Important hedgerows. The Act clearly and unreservedly states that a hedgerow must not be cut through unless it is for the defence of the realm or public safety and by no more than 20 metres wide, where no other means of access is available and then it must be immediately made good. Any access to Site 3565 would necessitate the hedgerow being cut through and that would contravene criteria set out by DEFRA. In addition to contravening government legislation, it must be noted that the hedgerows form natural habitats for endangered species, notably Bechstein Bats and water voles. Any disruption to the hedgerows would impact detrimentally on these creatures. As custodians it is our duty and responsibility to ensure the continuation of protected species wherever possible and government legislation is in place to ensure local governments adhere to this. To cut through hedgerows in the certain knowledge that these endangered species are present is unacceptable and contravenes government legislation presented by DEFRA. Furthermore any cut through would involve cutting down trees that have tree protection orders in place. Wiltshire Council has been made aware that the site encompasses both Level 2 and 3 flood plains. The area is bisected by the Lambrok Stream and the Lambrok Brook. The site has historically and regularly experienced episodes of significant flooding. This has directly impacted on the North South axis of the site where surface water and raw sewage has been forced out of drains into existing housing developments gardens adjacent to the proposed site. The land consistently suffers from excessive surface water. Further development would exacerbate and increase incidents of flooding and would invalidate the Environment Agency requirement for a lifetime certainty of freedom from flooding. NPPF regulations state that development should be away from flood plain areas and associated drainage and this is further supported by Natural England. Should Site 3565 be developed, flooding will inevitably increase, thereby significantly impacting on current housing developments built in the 1970s, 1980s and 1990s alongside newly built properties under the current proposals whilst further undermining and damaging important heritage sites situated on and within the site. This will directly contravene the Environmental Agency documentations. To gain access to the site would incur breaking through Important and protected hedgerows and protected trees, dissecting flood plains and or building a bridge/culvert from the A361. None of which is either legal or financially viable. Given the number of brown sites currently available for development in Trowbridge, most notably the old Bowyers site and mindful that planning permission for a significant number of houses has already been granted

	<p>by Wiltshire Council eg: at West Ashton Court, the need to develop a significant heritage site with legal protection is unwarranted. We must preserve our heritage sites and be mindful of any development that significantly under minds their integrity and importance for future generations. To develop Site 3565 would be illegal and unsustainable under current legislation. The site is presented as being of marginal sustainability and fails many of the tests set up for sustainability criteria, most notably access to an infrastructure supporting health, education and transport links. Serious concerns have been raised in the HIA report pertaining to these matters. Thank you for taking the time to consider my arguments as listed above. Given the strength and significance of the legal arguments stated within and supplied by government agencies, I hope Site 3565 will be removed from Wiltshires Housing Site Allocation Plan following your inspection.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	257	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>		<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Not positively prepared the analysis of actual housing development requirements for the Westbury Town area is inadequate; there is an excess of 291 houses against the plan, which means that the Westbury Community Area is planned to be over-provisioned for by 245 houses. This means that no additional requirement for allocations is needed. Not justified the development of both Site 738 and Site 321 does not comply with Wiltshires Core Strategy, Core Policy 1, Clause 4.15: Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. Both sites are outside the village settlement boundary, which according to 2.8 is "with limited exceptions, not acceptable". In the last survey of housing need of Bratton, in 2015, just 8 houses/households were identified as required. Thus, both Site 738 and Site 321 individually exceed the housing needs requirement of the village. This calls into question the non-compliance with Core Strategy, Core Policy 1: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities . It is suggested that both sites are considered modest development, although this is assessed against the incorrect figure of 819 dwellings in the village. The 2011 census identified 512 households, with 1248 residents. This misrepresentation of the number of households in Bratton (there are currently less than 520) is despite being clearly advised of the correct number by many residents of Bratton, and by Bratton Parish Council in 2017, in response to the pre-submission consultation on the Housing Site Allocations Plan. Over the last 10 years, Bratton has had the addition 26 new houses, or 5.1%. An extra 40 new houses in Bratton would represent a further 7.8% increase, so that the proposed 15-year growth of the village would be 12.9%. This is neither justified, nor proportionate, nor sustainable. The WHSAP, Community Area Topic Paper Westbury, states at Table E1, Stage 2B (p46): Bratton Parish Council have advised Wiltshire Council that SHLAA site 321 is a site with potential for building in the future bearing in mind it is in the Salisbury Plain Special Landscape Area and, as it is at the West entrance to the village, any development should be designed to present an attractive aspect both in terms of landscape and architecture to this approach. This statement is a FALSE representation of the Parish Councils views. The minute of Bratton Parish Council Meeting, 5 September 2017, Item 17/63, reads: Wiltshire Council Draft Housing Site Allocations Plan Members discussed the Housing Site Allocations Plan (HSAP) and noted the report from the Chair, which had been circulated with the agenda papers. Members discussed the draft plan and it was proposed by Cllr Ridley, seconded by Cllr Forsyth and resolved (Cllr Ligo abstaining) to object to the inclusion of the land in the HSAP on the following grounds: That the development site is outside the settlement boundary That the development would have an adverse effect on the conservation area of the parish, impacting the</p>			

views from higher ground and the White Horse That the development would have an adverse impact on local amenity and represented over development That the development would have a detrimental impact on already over burdened infrastructure That there were other potential sites within the existing settlement boundary which needed to be considered which could provide the potential for development to meet local need within the settlement boundary That the increase in residents would represent an unmanageable increase in traffic and create significant highway issues It is noted that in the WHSAP Sustainability Appraisal Sept 2018, under the title Education and Skills, it states that Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work . Also, under the title Economy and Enterprise, that Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport. There are very limited employment opportunities within Bratton; the proposed new housing would result in increased out-commuting. Either or both developments would have a detrimental impact on the already over burdened infrastructure and services of the village water, drains, pre-school and primary school, GP surgery, shop. An extra 40 additional houses would bring major disruption and pressures to the whole community, as well as significantly change the nature of the village. There are no straightforward mitigation measures that can be applied as asserted in the Westbury Community Area Topic Paper. Access to both sites from the narrow main road, B3098, would be very difficult. The changes needed for reasonable access would in themselves make a significant impact on the village. The B3098 is very busy especially at each end of the day, with regular heavy traffic incl large lorries. The number of vehicles through the village can exceed 400 per hour as recorded by the village Speed Watch team, representing a doubling in the last 3 years. Access to and from Site 738 in particular for vehicles and cyclists would be unsafe due to poor visibility and adequate sightlines, plus the narrowness of the highway. Current pedestrian and bicycle access along Westbury Road to the centre of the village is inadequate, and in several places unsafe. Major changes would be needed to accommodate either site. Both sites would significantly affect the view and entry to the village and impact on the nature of it being a village. Both would have an adverse effect on the conservation nature of the village. Both sites would be very prominently seen from the main Westbury Road, as one enters the village particularly with Site 321 dropping sharply away from this road before levelling out, so that the layout of any buildings, etc in the area could not be hidden or shielded from view. The whole area is in an area of outstanding beauty and the proposed development would impact very significantly on the views from the Westbury White Horse and the top of Salisbury Plain. Any proposed landscaping with trees and shrubs would conflict with the openness and expanse of the hillside, which is part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). There are other existing and potential small housing sites within the current settlement boundary to meet local need. Such smaller units are better integrated into the existing infrastructure which would reduce the impact on the village and its community. This would also preserve the beauty of the whole area below the White Horse ridge. Bratton is a village, and its characteristics need be preserved as such. Bratton is currently carrying out its own Neighbourhood Plan which will set out future plans for the village. Not effective Large-scale developments on the edge of large villages are not effective in delivering the needs of people moving to the area who require housing unless there are employment opportunities there. Not consistent with national policy Large-scale housing developments on the edge of large villages are not promoted by National Policy.

**Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:**

**Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).**

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	258	<b>Consultee</b> Estate Manager Longford Estate	<b>Agent</b> Associate Planner Pegasus Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 900160	<b>Person ID:</b> 900154	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC3				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>PC3 provides an update to Table 4.1 Housing Market Areas: Minimum to be allocated. As the Plan has already been submitted for Examination (on the basis of NPPF 2012) it is noted that for the purposes of Plan-making the housing land supply should be calculated in accordance with the NPPF 2012 (as recognised in paragraph 3.1 3.2 of Topic Paper 3 Housing Land Supply Addendum July 2018) according to paragraph 214 of NPPF 2018. However, for the purposes of development management (ie the consideration of planning applications) the new NPPF 2018 applies for the calculation of the housing land supply. Therefore as soon as the Plan is adopted the housing land supply will be different to that considered through the local plan examination. It is noted that Topic Paper 3 sets out the before position ie it excludes the proposed allocations. Table 3.4 of Topic Paper 3: Housing Land Supply Addendum identifies that the housing land supply position of the South Wiltshire HMA will decline rapidly unless the emerging allocations are found to be sound, which cannot be guaranteed. Even when the allocations are included in Topic Paper 4, Table 6.6, on the basis of the Councils assessment there is a only five year housing supply until the monitoring year of 2021. The amendments to Table 4.1 show that the minimum to be allocated has increased from 594 dwellings to 1,331 dwellings, reflecting the reduction in supply of approximately 1,058 dwellings. It is noted that the strategic allocation of Churchfields, Salisbury is no longer included in the supply as it is subject to significant delay and therefore is not included in the plan period to 2026. In addition we have questioned some of the commitments, eg 200 homes at the Central Car Park site (Salisbury). It is widely known that this site together with Churchfields have been long standing allocations ( ref Wiltshire Core Strategy Core Policy 20). Similar to Churchfields, the Central Car Park is in commercial use with no evidence or application coming forward to indicate its deliverability within the plan period. Pegasus continue to object to the inclusion of the Central Car Park site of which 100 dwellings are anticipated on the site in the plan period. Including this site as part of the developable commitments is both misleading and contrary to paragraph 14 of the NPPF (2012), which states that local planning authorities should positively seek opportunities to meet the development needs of their area and should meet their objectively assessed needs. Furthermore, it is noted that paragraph 6.2 of Topic Paper 4 July 2018 states that there is uncertainty as to whether the full number of units allocated at the Kings Gate, Amesbury strategic allocation will be delivered. As a result there remains a residual requirement to be met in the South Wiltshire HMA and significant uncertainty over those sites that are included in the deliverable supply. The Councils response is to propose a new allocation of 14 dwellings at The Yard, Salisbury, rely on an delivery at Fugglestone Red (a site with planning permission) and the proposed allocation a</p>			

	Netherhampton Road, the anticipated delivery from these sites during the plan period is questioned. An objection is made to the deliverable supply this is addressed in detail in response to PC15 and PC17.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	259	<b>Consultee</b> Estate Manager Longford Estate	<b>Agent</b> Associate Planner Pegasus Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 900160	<b>Person ID:</b> 900154	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC4				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>PC4 is the changes proposed to paragraph 4.2 to clarify that the figures in Table 4.1 do not include windfalls. The proposed changes to Table 4.1 ( PC3) clearly show that the minimum to be allocated in the South Wiltshire HMA has increased by approximately 55%. Our objections to PC15 Table 4.7 have questioned the methodology for windfalls. An objection is made to the approach to windfalls which has deviated from the approach in the adopted Wiltshire Core Strategy. The approach in the Core Strategy was found sound, (but conservative) by the Inspector. The Council are now using an approach which gives a higher figure and are relying on a greater number of large windfall sites than found sound by the Inspector. In the adopted Core Strategy the Council relied upon Method 1 (as set out in the July 2014 HLSS) ie for South Wiltshire over 5 years the windfall allowance was 230 dwellings. The Council are now using Method 3 from the 2014 HLSS (now referred to as Method A) which generates 330 dwellings over the 5 years. However, the consistent application of Method 3 / Method A shows how the number of windfalls has decreased over time ie from 449 dwellings over 5 years to 330 dwellings over 5 years. This shows windfalls are declining and yet the Council persist with a method which is totally reliant on historic trends of windfalls. The Council are also allocating sites, therefore the capacity is reduced for windfalls as these sites will come forward as allocations. This would suggest that the number of windfalls will be below the declining historic trend. It is considered that going forward, for the remaining plan period that there is an over reliance on windfalls in the South Wiltshire HMA.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		



<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>No, the Proposed Change does not meet a previous objection</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	260	<b>Consultee</b> Estate Manager Longford Estate	<b>Agent</b> Associate Planner Pegasus Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 900160	<b>Person ID:</b> 900154	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC15				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>PC15 provides an update to Table 4.7 HMA housing land supply to reflect the latest housing land supply statement. The latest assessment of the developable supply which is available is contained in the Wiltshire Housing Land Supply Statement Update March 2018 (HLSS) with a base date of April 2017. The Councils latest evidence indicates that from April 2018 the Council are unable to demonstrate a five-year land supply against the adopted requirement without the emerging allocations, this is based on NPPF 2012 which allows a far more permissive definition of a deliverable site. Whilst this is acceptable as the Plan was submitted under the transition arrangements, once the Plan is adopted the assessment of housing land supply will be subject to the new NPPF 2018 and the housing delivery test (the latter is to be published in November 2018). NPPF 2018 fundamentally changes the assessment of deliverable supply, such that certain sources of supply should only be considered deliverable where the Council provides clear evidence that the first completions will be achieved within five-years. We have undertaken an assessment of the deliverable supply in accordance with NPPF 2012 and conclude that the Council is only able to demonstrate a deliverable supply of 2,593 homes, which equates to a 4.20 year land supply rather than the figure of 5.7 years supply as suggested in amendments to Table 4.8 (PC17). Given the figures in the adopted Wiltshire Core strategy are a minimum housing requirement and given that the housing land supply as currently calculated is fragile towards the end of the plan period, and furthermore given the delay in the preparation of the Wiltshire Core Strategy (it cannot be relied upon to address the shortfall) it is considered that a contingency should be included for the South Wiltshire Housing Market Area. Land to the north of Old Sarum has been submitted to the Council, indeed this area (Longhedge) along with land at Netherhampton was recognised in paragraph 5.112 of the Wiltshire Core Strategy ( adopted January 2015) as:- broad areas of search for future development around Salisbury are mapped in Topic Paper 19 (see map Potential Areas for Strategic Growth in and around Salisbury/Wilton ) 45. If further land is required in the future, sites at Netherhampton and additional growth at Longhedge should be considered as part of the councils ongoing monitoring process. An objection has already been made to Policy H3.1 the inclusion of land at Nerthhamton Road for 640 dwellings and questioned the deliverability of the site in the plan period. It is noted that whilst in the Housing Site Allocations Plan, land at Netherhampton Road, Salisbury is proposed in the Plan for 640 dwellings, however, according to the HLSS March 2018, only 520 are envisage to be delivered in the plan period and this is assuming a start date of 2021/22 with 40 dwellings in that year and thereafter 120 dwellings per annum. Evidence Windfalls In our reps to PC4 we have questioned the windfall figure. As can be seen from page 113 of the Housing Land Supply Statement, the number of windfall completions and permissions is highly variable (ranging between circa 40 and 170 dwellings per annum in South Wiltshire). This is as a result of the influence of occasional large site windfalls which cause significant variation from the broadly</p>				

consistent level of delivery of small site windfalls. The Council now simply assume that the historic average rates persist without evidence that there is the capacity to sustain previous rates of large site windfall delivery. This means that exceptional windfall permissions (which will not be replicated) become embedded in the trends which the Council relies upon in the future, even if there are no similarly sized potential sites which could replicate that which has occurred. Such an approach cannot be sound. Saved Local Plan Allocations The Council continue to rely upon the delivery of saved Local Plan allocations in the Table 4.7. Appendix 1 of the HLSS, March 2018 although the number of sites and the contribution from those sites has reduced significantly as the Council have acknowledged that the Churchfield site will not come forward until beyond the plan period. There are still some saved local plan sites that are included: The saved local plan allocations from the South Wiltshire Local Plan are: Bulbridge {45 dwellings} Salisbury District LP 2003 and carried forward to South Wiltshire Core Strategy (adopted 2012). Bulbridge this site is a saved allocation from the Salisbury District Local Plan which was adopted in June 2003. In the intervening 15 years, no planning application has been received for the development of this site. This record alone indicates that there is no realistic prospect of delivery according to the PPG (3-020). This site is not subject to any planning application. Oldstock hospital {45 dwellings} this sites also dates from the Salisbury District Local Plan and is not envisaged to delivery until 2022/23, some 20 years later from when it was allocated. Old Manor Hospital {9 dwellings} Salisbury District LP 2003 and carried forward to South Wiltshire Core Strategy (adopted 2012). It was allocated for 80 dwellings. A full planning permission has been granted for 71 dwellings (15/09465/FUL) and the remainder of the allocated area has gained permission or been built for alternative uses (including care homes and a primary healthcare facility). There is therefore no remaining capacity for the residual 9 dwellings to be built. However, the Council include these remaining 9 dwellings for which there is no capacity, and which is not the subject of detailed consent within their deliverable supply. It can be concluded that these sites were allocated in June 2003 and saved again in February 2012. In the intervening years these sites have not delivered and as such they are unlikely to provide a reliable source of supply in the future. Proposed Allocations It is evident from the HLSS March 2018 that the allocations comprise 173 dwellings of the deliverable supply for 2017-2022. Due to the reliance on one large site and commitments, the housing land supply deteriorates towards 2022/23. (Table 4.8 PC 17). Housing Land Supply There is a difference in the deliverable housing land supply from that set out in the Housing Land Supply Statement published March 2018 (base date April 2017). Table 2 states that the deliverable supply 2017 2022 for South Wiltshire is 3,173 dwellings (this corresponds with Appendix 4 of the HLSS) however, when compared to Table 6.5 in Topic Paper 4 July 2018, the figure for the deliverable supply is 3,187 dwellings. The difference being 14 dwellings which is the proposed allocation: The Yard, Salisbury. For reasons set out above, eg question the reliance on windfalls, the saved allocations and the deliverability of some of the proposed allocations, we do not believe the housing supply as set out in Topic Paper 4. There remains no up-to-date housing trajectory to support the Proposed Changes.

**Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:**

**Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).**

**Please state which evidence document this representation relates to:**

**Please give details of why you support or do not support the updates to the associated evidence documents.**

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>No, the Proposed Change does not meet a previous objection</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	261	<b>Consultee</b> Estate Manager Longford Estate	<b>Agent</b> Associate Planner Pegasus Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 900160	<b>Person ID:</b> 900154	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC16				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC16 refers to paragraph 4.32 which is proposed to be updated to reflect the HLSS March 2018. The amended text states that for the supply exceeds the five year requirement through to the end of the plan period for all years except for four in South Wiltshire HMA, and then states that by then additional allocations will be included within the review of the Wiltshire Core Strategy. However, the Wiltshire Core Strategy is significantly delayed. It is over twelve months since there was a consultation on the scoping of the Core Strategy Review and no further consultation is envisaged until the latter part of 2019. Consequently, the Site Allocations Plan will not be able to rely upon the Wiltshire Core Strategy to address the housing shortfall later in the plan period. Even based on the Councils assessment of housing land supply, the position deteriorates in 2019/2020 onwards so that by 2022/23 the housing land supply is vulnerable being only 5.14 years (PC17 Table 4.8). In order to ensure that there is a five year housing land supply it is considered that a contingency site needs to be included in the plan ie Land off Britford Road, Harnham which has previously been identified in the WHSAP process as a Potential Site Option.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	262	<b>Consultee</b> Estate Manager Longford Estate	<b>Agent</b> Associate Planner Pegasus Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 900160	<b>Person ID:</b> 900154	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC17				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>PC 17 relates to Table 4.8 HMA Five Year Housing Land Supply. Topic Paper 4 paragraph 6.6 acknowledges that a 5 year housing land supply with a 5% buffer can only be demonstrated until 2021 and this is calculated on the basis of NPPF 2012 which takes a more permissive approach to assessing deliverable sites. We have already made the point in representations to PC4 that once the Local Plan is adopted the method for the calculation of housing land supply will change and therefore the position is not as robust as set out in Topic Paper 4 July 2018. Therefore it is considered that the Plan should include a contingency site ie land off Britford Lane, Harnham which was acknowledged in the initial Issues and Options Consultation of the WHSAP as a Potential Site Option. Land at Netherhampton Road is proposed in the Site Allocations Plan, but the allocation of 640 dwellings is not deliverable in the Plan period to 2026 ( approximately 120 dwellings are envisaged post 2026). This is set out in the Councils evidence base the HLASS published March 2018. Pegasus has already submitted detailed objections on behalf of Longford Estate in September 2017 objecting to the Netherhampton Road site (Policy H3.1) and promoting land off Britford Lane which has been assessed in the preparation of the Housing Site Allocations Plan. We have objected to the Sustainability Appraisal of the site and provided evidence to support our objections when we responded to the consultation on the Plan in September 2017. Our previous representations set out that land north of Britford Lane (SHLAA site 3434) should be considered as a more sustainable location for growth that can be delivered in the plan period, which would contribute to some of the housing provision on which Policy H.3 is reliant and also in recognition that the housing land supply deteriorates through the plan period. The land off Britford Lane, Harnham is well placed to accommodate growth in order to meet local housing needs in a sustainable way within walking distance of Salisbury city centre. SHLAA site 3435 is highly sustainable and deliverable that could be allocated to help address housing need. Including Site 3435 as a housing allocation would ensure that the WHSAP is effective as it is deliverable within the plan period and would ensure that despite proposed changes made to the residual requirement in the Salisbury and Wilton Community Area (as set out in accompanying representations), the objectively assessed needs can be met before 2026. The land is available and a number of technical studies have been undertaken to inform the masterplanning of the site. These were submitted to the Council in September 2017 to support our representations on the Site Allocations Draft Plan. Longford Estate also considers that Site S110 (Land to the East of Southampton Road, Alderbury) could help to address housing need. It was considered to be a suitable housing site and recommended to be allocated for housing by the Planning Inspector who reviewed the Salisbury District Local Plan (adopted in 2003). It has continued to be promoted since then and an outline planning application for 50 dwellings is currently subject to an appeal (planning application ref. 17/04001/OUT). The proposals will deliver a range of social, economic and environmental benefits which can be afforded varying levels of weight. The site is outside of any</p>				

	<p>designations and surrounded by built form therefore the degree of change to Alderbury village is at worst marginal. Of all the Large Villages, Alderbury is the largest with a greater number of residents and facilities, and it is the most sustainable, being the closest to Salisbury city centre (2km) with a number of regular bus routes into the City Centre and within 1km of the Park and Ride. Alderbury has a primary school; including before and after school care (with confirmed capacity to accommodate children from the proposed 50 dwellings); a pre-school and other village infrastructure such as local pubs, shops, churches and community facilities that are well placed to accommodate growth in order to meet local housing needs and support existing services and facilities including rural employment opportunities. Potential development sites in the Southern Wiltshire Community Area, including site (Site S110 Land to the east of Southampton Road, Alderbury) submitted to the Wiltshire Strategic Housing Land Availability Assessment process, have not been assessed in the Sustainability Appraisal (June 2017) as the WHSAP states that development in the Large Villages in the Southern Wiltshire HMA should come forward through Neighbourhood Plans, not through allocations in the WHSAP. It is clear from the HWP (Feb 2017) that the current policy approach of the Government to housing in villages is to support development that will help villages to thrive and to meet local housing need. While changes to the NPPF are yet to be published for consultation the Governments emerging direction of travel with regard to this policy matter is clear, and accordingly sites for growth in the Large Villages of the WHSAP should be positively considered for allocation within the Southern Wiltshire Housing Market Area where Neighbourhood Plans are not at an advance stage of preparation. For certainty and to plan positively for housing land supply purposes, and to meet the minimum local housing need identified through the WCS the WHSAP should allocate sites in the Large Villages. Site S110 is located in a sustainable location as described above and has a thriving local community with active community organisations and associations. The allocation of Site S110 in this location would help to sustain the local services and facilities and would meet local housing need.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		



<p><b>proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	263	<b>Consultee</b> Estate Manager Longford Estate	<b>Agent</b> Associate Planner Pegasus Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 900160	<b>Person ID:</b> 900154	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC27				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>PC27 provides an update to Table 4.11 South Wiltshire HMA - distribution of housing development 2006-2026. It is noted that the developable commitments includes the proposed allocations. The developable commitments has reduced from 3,833 dwellings to 2,970 dwellings, it is considered that this figure should be reduced further to reflect the uncertainties surrounding the central car park site (even though only 100 dwellings is included in the plan period at this site) and also to acknowledged the uncertainties in relation to the delivery of housing at Kings Gate, Amesbury (paragraph 6.3 Topic Paper 4 July 2018). Based on the Councils figures the developable commitments excluding proposed allocations for Salisbury and Wilton are 2,226 (Table 2.3 Community Topic Area Paper Salisbury July 2018), allocations comprise: Netherhampton Road reduced in the HLSS for the plan period to delivery 540 dwellings ( allocated for 620 dwellings) Hilltop Way 10 dwellings North of Netherhampton Road 100 dwellings Land at Rowbarrow 100 dwellings The Yard 14 dwellings The total allocations proposed to delivery in the plan period is 744 dwellings. Compared with the residual requirement of 866 for Salisbury and Wilton (Table 2.3 of the Community Topic Paper July 2018 referred to above), leaving a shortfall which is to be met by windfalls in Salisbury and Wilton. We have critised the assumptions for the windfall figure in our response to PC4. In view of our objections to the Housing Land Supply and our objections to the allocation of Netherhampton Road ( the latter is set out in detail in response to the Draft Plan in September 2017) it is considered that the developable commitments (which includes proposed allocations) should be increased to reflect the fact the overall housing requirement is a minimum (indicative housing requirement and is therefore not a ceiling figure). The Council based on their own figures acknowledge that the surplus amount possible over the indicative requirement for the plan eriod is modest even at face value . In view of the above there should be contingency sites included in order to support/maintain the five year housing land supply and housing delivery across the plan period and support the role of Salisbury as the Principal Settlement and focus for development in the HMA.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<b>document this representation relates to:</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	264	<b>Consultee</b> Estate Manager Longford Estate	<b>Agent</b> Associate Planner Pegasus Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 900160	<b>Person ID:</b> 900154	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC29				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>PC29 amends paragraph 4.64 to the effect that two allocations of over 500 dwellings provide a large source of supply . However, one of the allocations was included in the Wiltshire Core Strategy ie Fuggleston Red and has planning permission and is continuing to be developed. The other allocation is a proposed allocation at Netherhampton Road. The reliance on these two sites is significant. Of the proposed allocations in the Salisbury Community Area ie 850 dwellings, the plan proposes 74% on one site at Netherhampton Road (Policy H3.1), which is not envisaged to commence delivery until 2021/22 and then only 40 dwellings are anticipated. Thereafter, 120 dwellings are expected with the site continuing to delivery post 2026 beyond the plan period. We have in our response to Policy H3.1 of the Draft Plan in September 2017 objected to the site and outlined our major concerns in respect of traffic, landscape, water supply and deliverability. The proposed changes do not provide any further information to support the proposed allocation of land at Netherhampton Road, (Site 1208) Policy H3.1. There is no evidence to indicate that the development could come forward by overcoming the very real constraints and develop a comprehensive mixed use strategy within the plan period. Furthermore, it is noted that both sites ie land to the north of Netherhampton Road (Policy H3.3) and land at Netherhampton Road (Policy H3.1) comprising proposed allocations of 640 dwellings and 100 dwellings respectively are in the control of the same developer Bovis Homes. The HLSS ( March 2018) indicates that both sites will start to deliver with 40 dwellings each in 2021/22 and then the following year 120 dwellings are expected from land at Netherhampton Road and 60 dwellings from land north of Netherhampton Road, ie 180 dwellings from Bovis Homes in a year. Even on the basis of the Councils own evidence for a forthcoming inquiry the average that has been achieved on one site is 117 dwellings ( on land North, West and South of Bishopdown Farm - Barratt David Wilson). We remain of the view that the approach taken in the Housing Site Allcoations Plan to allocate 74% of the Salisbury housing allocations in one location, with many unknown and unresolved issues, risks a significant housing shortage in Salisbury within the plan period. By limiting the potential housing supply to one large site in Salisbury, the plan conflicts with paragraph 14 of the NPPF which states that: Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to prapid change. Should sites S1028 and S1027 fail to deliver within the plan period, the Plan as currently proposed does not allow for sufficient flexibility for an alternative, deliverable site to come forward in accordance with policy. It is considered that the Plan should address this issue and a contingency site at land off Britford Lane, Harnham should be included in the Plan, this site should be allocated and can then support the five year housing land supply.</p>			

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	265	<b>Consultee</b> Estate Manager Longford Estate	<b>Agent</b> Associate Planner Pegasus Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 900160	<b>Person ID:</b> 900154	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC31				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC31 amends paragraph 4.68 to reflect that the intention is that Fugglestone Red (instead of Churchfields) and the Netherhampton Road site will deliver new homes alongside each other towards the end of the plan period. For reasons set out in response to the Proposed Changes this is not considered to be a robust and effective strategy as the anticipated delivery per year from these sites is questionable. I refer to our previous representations on Policy H3.1 which questioned the delivery from the Netherhampton Road site and also reference was made a report into the delivery of urban extensions on behalf of Gladman Developments Limited in 2014 and the also the Savills study on behalf of Barratt Homes in 2014. Nathaniel Lichfield and Partners produced a report 'Start to Finish' in November 2016 which also illustrates the long lead in times for large sites, that on average it took 3.9 years lead in time for large sites prior to the submission of the first planning application. Pegasus remain concerned that the sites that the Council rely upon will not delivery as set out in the housing trajectory.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	266	<b>Consultee</b> Estate Manager Longford Estate	<b>Agent</b> Associate Planner Pegasus Planning	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 900160	<b>Person ID:</b> 900154	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Main Report (EXAM/02A)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p>Pegasus Group submitted representations to the draft WHSAP in June 2017, objecting in relation to Site 3435 (Land off Britford Lane, Harnham). The site was included in the Issues and Options Consultation Draft of the WHSAP as a "Potential Site Option" but was subsequently removed</p> <p>Wiltshire Council published a Housing Site Allocations Informal Consultation in February 2015. Included within this was a Plan identifying "Potential Site Options". The Council's Site Identification Process involved removal of sites with strategic policy concerns, including land within Flood Zone 2 or 3. As a result of several discussions with Wiltshire Council policy officers in August 2014 through to the publication of the</p>				



**Assessment Addendum  
(September 2018).**

Informal Consultation regarding the deliverability of the site, Site 3435 was included as a Potential Site Option. The site is referred to as SAL2 (and erroneously included the neighbouring rugby fields).

A large amount of technical information was submitted to Wiltshire Council (highways, drainage, flood risk, landscape impact, heritage, design) yet the Stage 2(a) assessment contained within the Salisbury Community Area Topic Paper failed take any of this technical information into account, which led to its unreasonable exclusion from the site selection process.

The Stage 2a assessment was based on a series of “exclusionary questions” which were set out at Table D.2. We did not object to the principle of the methodology, however the approach taken to question 5 (“Is the site fully or partly within flood risk areas, zones 2 or 3?”) was inflexible and resulted in errors which consequently led to the removal of Site 3435 (Land off Britford Lane) from the assessment at that stage.

Furthermore, the assessment made an uninformed and incorrect assumption of the highway capacity of the ‘main road’ (Newbridge Road), using it as a reason to remove the site from further assessment. Our objections highlighted a major inconsistency in the approach taken to the site assessments and we detailed in the representations the specific errors in the approach taken to assessing site 3435 (Land of Britford Lane) which we do not propose to repeat here

In response to the representations made, the Council has assessed Site 3435 in the revised Sustainability Assessment which defines it as a “less sustainable site” at the Table at page 15.

At paragraph 7.1.3, there is a review of ‘additional’ sites that have come through the Council’s Stage 2 site selection process, and this includes Site 3435. At page 103, the Table states that:

*“This site was previously rejected at Stage 2 of the Council site selection process however, additional information has since been received and this site has now been taken forward for SA”.*

The site was therefore considered to have passed Stage 2 of the Council site selection process and in the document it is put forward to the Stage 3 assessment stage. Site 3435 is assessed at pages 186-187. The assessment considers the site as being capable of accommodating 87 dwellings, however architectural masterplanning has demonstrated to officers that the site is capable of accommodating 100 dwellings.

The assessment confirms that no major adverse effects have been identified which we agree with.

However, we disagree with the six moderate adverse effects that the assessment identifies at the site and we raise the following points:

- The assessment refers to the woodland belt running through the middle of the site and that it should be protected and enhanced. The technical submission prepared in relation to Site 3435 explained that the tree belt is protected by a Tree Preservation Order, and designs were set out to illustrate how this feature of the site could be opened up to the public and made into a landscape design feature.
- The assessment considers that development at Site 3435 would lead to an increase in demand for water. This would be the same for any development site and it would be unreasonable to allocate an adverse effect for this reason.
- The assessment recommends that further flood modelling work and a Flood Risk Assessment would be required. Masterplans have been presented including a detailed package of technical information which specifically excludes the Flood Zone 2 area from development. The detailed package of information included a surface water drainage strategy.

- The assessment makes a sweeping statement that development of the site would cause harm to the character and appearance of the Conservation Area, the setting of the Conservation Area and the setting of the Cathedral. It is unreasonable to make these assumptions without qualifying them. A heritage assessment was undertaken as part of the technical submission, and a meeting held with Officers confirmed that there would be “less than substantial harm” and therefore the test is whether this is outweighed by public benefit and no such assessment is set out in the Consultation document.
- In terms of local services and facilities, the assessment states that the local GPs and schools are at capacity and therefore mitigation would be required. This is inaccurate. On 08.11.2018 the Edubase website states that there is capacity at the school of 90 pupils are there are 81 currently at the school. Harnham Infant School is stated to have a capacity of 270 children and there are currently 255. Therefore there is capacity within these two schools for 24 pupils. It is unreasonable to state these reasons as rendering the site as having a moderate adverse impact.
- The assessment refers to the highly sustainable location of the site yet considers it to have a minor adverse effect as it is likely to generate car journeys – however it is clear that being within 10 minute walk from the city centre, the site is far less likely to generate car journeys than, for example being located at Netherhampton Road.

To summarise, the Sustainability Assessment of Site 3435 (Land off Britford Lane) makes incorrect assumptions that are not justified by evidence. The inconsistent approach to site assessment is amplified by the fact that Wiltshire Council planning officers have been party to a number of meetings discussing the development potential of the site and have received a detailed package of technical information which demonstrates that the site can accommodate 100 houses in a highly sustainable location, bringing with it numerous material benefits including 40% affordable housing

It is submitted that in order to make the WHSAP sound that Site 3435 be re-assessed in light of the technical information that has been provided to the Council regarding the capacity of the site.

The site is highly sustainable and deliverable that could be allocated to help address housing need.

Including Site 3435 as a housing allocation would ensure that the WHSAP is effective as it is deliverable within the plan period and would ensure that despite proposed changes made to the residual requirement in the Salisbury and Wilton Community Area (as set out in accompanying representations), the objectively assessed needs can be met before 2026.

Longford Estate request that the site is considered as an ‘omission site’ at the Examination as it is well placed to accommodate growth in order to meet local housing needs and support existing services and facilities and reduce the number of car journeys and pressure on the highway network in comparison with other proposed allocations further away from the city centre which would result in a heavier reliance on the car.

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	267	<b>Consultee</b> Crudwell Parish Council	<b>Agent</b>  <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126295		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Re: Crudwell Parish Council in support of the removal of Ridgeway Farm - Wiltshire Housing Site Allocation Crudwell Parish Council fully supports the decision at Cabinet Level to remove the Ridgeway Development from the Housing site allocation plan and would like to restate its comments on the original plan that decisions of this type are best made by local people at a local level with the support of the community. Crudwell Parish Council continues to object to the proposed allocation of Ridgeway Farm for 50 dwellings (or 40 additional dwellings) on the basis that: there is no strategic need for the Housing Site Allocations Plan to identify any housing sites in the Malmesbury Community Area; in that context, Wiltshire Council's own documentation states that "the most appropriate means to assess local needs and plan growth at each Large Village is through the neighbourhood planning process" The emerging Crudwell Neighbourhood Plan is advancing rapidly and has already been the subject of a number of rounds of public consultation and exhibitions; the Crudwell Neighbourhood Plan will identify a housing site or sites to meet its local housing needs as defined by a housing needs assessment produced to inform it; the collaborative and inclusive approach adopted in producing the Crudwell Neighbourhood Plan is intended to achieve public support to a far greater extent than Wiltshire's Housing Site Allocations Plan has achieved; On that basis, we support the Housing Site Allocations Plan removal of any proposed allocations in Crudwell, and allow the Crudwell Neighbourhood Plan to make the decision about Crudwell's growth.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>No, the Proposed Change does not meet a previous objection</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	268	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposed change to remove the Ridgeway Farm site from the Wiltshire Housing Site Allocations Plan because firstly there is no Strategic Need for Wiltshire to allocate housing in Crudwell because firstly it isnt justified or necessary - supply in the Housing Market Area is good and the Wiltshire Core Strategy says development in Large Villages should be limited to small sites to meet local needs. Alongside this, Crudwells Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for earlySpring), and this will allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	269	<b>Consultee</b> Strategic Land and Planning Manager Linden Homes  <b>Person ID:</b> 890227	<b>Agent</b> Director Vectos  <b>Person ID:</b> 1187890	<b>Do you consider the Proposed Change to be legally compliant?</b>	
				<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC62				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	On behalf of Linden Homes Ltd we make the following written representation in respect of PC62, as follows: Surface water runoff from the Linden Homes development would be managed using a sustainable drainage strategy, with this incorporating appropriately located SuDS features within the layout and landscaping of the site. These features would include basins and swales to convey the surface water runoff across and from the proposed development at an attenuated rate, and therefore provide flood risk management to the surface water runoff rates and volumes. The use of these features would also provide additional environmental and community benefits, including to water quality, biodiversity, ecology, landscape, visual impact, recreation and education. Features for the infiltration of water to ground would be used in areas where this is viable followed then by an attenuated release with a discharge in accordance with the sustainable drainage hierarchy. The use of these features is a key component of the layout of the site, meaning that the drainage strategy would enhance the overall feel of the scheme and provide green corridor linkages across and from the site to the surrounding area.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	270	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187602	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [SBR]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>We are residents of Islove House, Quarry Hill , Box and would like to make representation to include our garden within the proposed boundary plan for the above. We have found our dwelling on the published plans as per EXAM.01.17(Sept 18) but the red/black line excludes our fenced garden that is attached to the house in J6. I attach two screen shots of the area with green annotations. Please exclude the simple nature of the diagram but hope it shows the boundary we consider to be incorrect. The area to the rear of the house has been used as garden for the property since I was a girl (I am now in my 50s!). After owning this house for the past 10 years, we are currently exploring extending to the rear of our property to meet the changing the needs of our family. We are aware of the imminent closing date and would be happy to expand with any further information as necessary. We are at a family funeral tomorrow (in Australia) and will endeavour to check emails. We would appreciate if this email could be considered as a consultation submission.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	271	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1129610	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposal to remove the Ridgeway Farm site from the Wiltshire Housing Site Allocation Plan on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" to meet local needs. Our Neighbourhood Plan is at an advanced stage and progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future. Over and above the comments above, I objected to the inclusion of the Ridgeway site in the first instance as I felt that the number of houses proposed was more than the Housing Needs Assessment indicated and that the over development of that site would only serve to exacerbate the high volumes of traffic using Tetbury Lane and increase the congestion at the very busy junction with the main road through the village.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	272	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1128343	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposal to remove the Ridgeway Farm site from the Wiltshire Housing Site Allocation Plan on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" to meet local needs. I have attended a number of meetings of the Neighbourhood Plan Steering Group and it is my belief that it is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), is very well supported by the community and is planning to allocate land to meet identified needs. The Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future. The Parish Council is also fully engaged with the NHP and I truly believe that this collaboration will deliver the right decision for the community with the right and appropriate level of development built in line with design standards and guidelines that will maintain the inherit character of the Parish.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	273	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187727	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Associated evidence documents		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Appendix 3 to Cabinet Report 3rd July 2018 Note on Elm Grove Field and Implications for Asset Transfer (July 2018) (WHSAP/04)				
<b>Please give details of why you support or do not support the updates to the</b>	Please include my comments, enclosed, in your response to the 'allocation' of Elizabeth II field to form part of the Elm Grove Farm housing development.				



**associated evidence documents.**

1 Poor Residential Area Planning?

Anecdotal observation suggests that there are many mature and elderly residents in the immediate catchment area of Elizabeth II field. The lack of use of the play equipment is partly due to the increasing age profile of local residents.

The environment of Elizabeth II field represents one of the few areas of land available to exercise dogs, an amenity disparaged by the (unsigned author) of APPENDIX 3 to Cabinet Report 3rd July 2018 Note on Elm Grove Field and Implications for Asset Transfer. as 'dog walking'. Dogs are a common pet for the elderly and certainly contribute to the wellbeing of an aging population in this area. There are no other areas available for this amenity within any reasonable distance.

'Locating the proposed school close to existing residential areas should act as a catalyst for promoting sustainable transport choices by extending pedestrian and cycles routes .. ' may be laudable council aim, but it does not fit with the potential access hazards of a bend in Wiltshire Drive.

As a grandparent who routinely collects primary age children from both Bratton and Hilperton primary schools, I see almost no children on bikes in this age group, with over 50% transported by car, and almost nil by bus. With many parents working, children are often delivered to school by carers who often do not live within the designated school catchment area and thus, may be unaudited by schools planning.

A typical example of poor planning to be avoided is at Hilperton school, located at the very end of a housing estate, which consequently gets blocked by cars; parking and manoeuvring. (Although there is a pedestrian access route, children and carers still need to emerge onto Newleaze).

The potential siting of a proposed school at the northern end of this development adjacent to Elizabeth II field (613/248) would inevitably create a similar problem, especially if the catchment area of 298 is included, with traffic moving through the estate to enable safe and secure transit for very young children!

It therefore makes sense to place a school; 'where the school can provide a natural focus for the local community, possibly in association with other local facilities such as shops or other community buildings'. - ie. central to new development, with appropriate transport planning.

from 'School-places-strategy-2015-2020' Wiltshire Council.

2 Safety on the bend

Attached is a photograph taken at a distance of 2.4m from the edge of Wiltshire Drive showing the bend, and the extremely poor visibility splay. A prior application to create an access here was withdrawn, due to highways concerns. The visibility splay problem has not improved since then, while the number of cars parked on Wiltshire Drive has increased, and is unlikely to diminish. While the main entrance of the proposed school would be from the South to the Elm Grove development, any access from Wiltshire Drive (including for construction traffic) would undoubtedly cause a parking problem either side of this bend, further adding to the reduction in visibility, and almost certainly, potential for accidents.

	To simply avoid the potential for serious accidents, the council should engage with the developer to provide the standard infrastructure required as part of the housing development. Bending the normal rules, in haste, to save money and provide a quick fix could well lead to unfortunate consequences.		
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	274	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposed change to remove the Ridgeway Farm site from the Wiltshire Housing Site Allocations Plan, on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	275	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>I did write about these two sites before on the 23rd July 2017 and 20th September 2017, but I am not able to find copies of my letters on the Council website and so I am writing again. My initial reaction is that the designated area Number 321 (Court Orchard/.Cassways) is rather small for 35 to 40 homes and the access is very poor and will be dangerous if the development goes ahead. Each morning, there will be some 35 to 40 cars all trying to get onto the Westbury Road through a single road access. Given that this site is lower than the Westbury - Bratton road, visibility of cars on the road will be limited for those leaving Court Orchard/Cassways. Perhaps half the cars will want to go to Trowbridge and so will turn left. From that direction, turning left again into the Trowbridge Road is difficult and the road then becomes narrow and steeply descending. The problems of accessing the Westbury Road and using the Trowbridge Road are very similar for the 738 site. Would it not be better to have a new development along the Lower Westbury Road, to the West of the existing houses on that road and with small groups of the new houses each with their own point of access to Lower Westbury Road. This would require that the Lower Westbury Road is upgraded and also a new access road constructed onto the Trowbridge Road. In order to pay for the extra roads, one could develop more than 40 homes. In this way and, if designed correctly, it should not spoil the view for any of the existing residents of Lower Westbury Road. A new link to the Trowbridge Road would mean that the new residents need not drive pass the existing residents on the Lower Westbury Road. The cost of upgrading the Lower Westbury Road and improving the link to the Trowbridge Road could be a condition of the tender. If the number of houses were to be increased to, say, 50 or more, then most developers would be willing to absorb the cost of the road building. Finally, regarding both sites, they are highly visible to any driver entering Bratton Village and whatever is eventually built on the sites needs to appropriate for a village setting and complement the existing features of the village. High density housing, as proposed, certainly would not complement the village.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	276	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187385		<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	277	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187730	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [possibly H2.6]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Question: This site is a rural oasis in already built-up surroundings, home to all manner of wildlife and plant life and enjoyed by the local community. Do you not agree that it would be more beneficial for brownfield sites located near the centre of town to be utilised before destroying what little remains of our greenfield land?				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	278	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1125693	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>			<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	279	<b>Consultee</b> Planning Policy Hampshire County Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1134720		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [General]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Thank you for consulting Hampshire County Council Minerals and Waste Policy Team regarding the above. Whilst we have no comments to directly make on the above, we would like to take the opportunity to highlight the following there are two safeguarded mineral and / or waste sites on the Hampshire / Wiltshire border. The two sites, and relevant details of each are as follows: Dean Hill MOD site, West Dean This is a waste water treatment work site and there is no reason why this would not continue to function Pound Bottom This previously was within the Hampshire border, but is now a site that sits within Wiltshire. However, it comes under the Hampshire Minerals and Waste Plan (HMWP) 2013 because it is within the New Forest National Park. This is an operational non-hazardous landfill site. In 2007, the New Forest National Park granted planning permission for the installation and operation of a leachate storage tank (which was to replace the previous leachate lagoon). New Forest National Park also granted planning permission (in 2007) for the installation and operation of a landfill gas utilisation plant. This latter permission initially granted operation until November 2017. I believe the site was due to enter into a restoration phase soon, but if you need further information on this, I would suggest you check the New Forest National Park planning pages since the planning permission and associated conditions lie with the National Park. Please also note that safeguarding requires any proposed development to avoid prejudicing the continued use of safeguarded minerals and waste infrastructure. For further information please see the Hampshire Minerals and Waste Safeguarding SPD <a href="http://www3.hants.gov.uk/hmwp-spds.htm">http://www3.hants.gov.uk/hmwp-spds.htm</a></p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	280	<b>Consultee</b> Hannick Homes & Developments Ltd and Mr A Hawker	<b>Agent</b> Principle Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1133384	<b>Person ID:</b> 1128217	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Effective	
<b>Identify Proposed Change Reference Number</b>	PC21				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>TOP.04C Topic Paper 4 Developing Plan Proposals Addendum (July 2018) provides on p.15 figures relating to the land supply position for Chippenham Community Area. These figures reflect PC21 (amendments to Table 4.10). This clearly shows that there is only a 1% variation in this particular rural community area between the Indicative Requirement for the plan period 2006-2026 of 580 dwellings and the total number of dwellings completed or committed (including allocations) for the plan period of 585 dwellings. The total Indicative Requirements for urban areas and rural areas for North and West Wiltshire of 24,740 are expressed in Table 4.7 as a Minimum Housing Requirement, they are not a maximum figure for housing delivery. This demonstrates that increasing the capacity of allocation H2.11 at Hullavington by a further 20 dwellings, by including the field to the north west of the allocated site within the allocation, that is allocating the whole of SHLAA site 690, will help to provide an enhanced buffer for this particular rural community area should other commitments fail to deliver. Twenty additional units at Hullavington, in line with previous representations made on behalf of our client for this site at Regulation 19 in September 2017, would result in an additional 3% of contingency for the Chippenham Community Area remainder providing enhanced flexibility in housing land supply for this geographical area of the authority. Moreover additional residential development at Hullavington would be sustainable in terms of reducing the need to travel as employment opportunities will continue to increase in the area with the purchase and development of the Hullavington Airfield site by Dyson for advanced technological and automotive engineering purposes. The Hullavington Airfield employment site lies to the south east of Hullavington village and will continue to provide additional employment opportunities within the plan period up to 2026 and beyond. This is evidenced by the recent submission by Dyson Technology Ltd of a planning application to Wiltshire Council registered on 29th August 2018 18/08271/OUT for the following development; Outline planning application for up to 44,150 sq.m. (GIA) of development, comprising a maximum of 20,000 sq.m. (GIA) of research and development/office floorspace (Class B1 (a) and (b)) and 24,150 sq.m. of ancillary development comprising test areas, an energy centre, a logistics/storage building, hangar building, staff and customer facilities, and gatehouse, retention and extension of operational runway, and new access arrangements, comprising a re-aligned section of C1 road and new roundabouts at both the junction of the A429/C1 roads and on the C1 road (all matters reserved except for access).</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018)</b>		



<b>Regulation Assessment document this representation relates to:</b>		<b>or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	281	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187736	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [H2.1]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>For the attention of: Inspector for planning. I wish to raise my concerns and objections to the following planning project included in the County Council' Draft Wiltshire Housing Site Allocations Plan. Policy H2.1 -Proposed allocation on land at Elm Grove Farm. A petition has been raised, not by any social media method, but by talking to people in the local area of the proposed site and producing a list of signatures, of people who are against the idea. A total of 348 signatures have been collected. The petition was based on the following: 1). The loss of our only green area, for children to play, people exercising and dog walkers to use. 2). The field became part of a legacy, after the London Olympics. It has been a recreational area for the past 30 years. 3). Increased traffic on Wiltshire Drive. At least 14 recorded accidents in recent years. 4). Large construction Lorries entering the field from Wiltshire Drive, during the adjacent housing development, prior to the school being built. 5). Do we need a new school? Schools are included in plans for the Yarnbrook to Hilperton development. It amazed me how many people didn't have any knowledge of what could possibly happen in this planning for houses in the town, 90% to 95% had never heard of anything taking place and therefore knew nothing about it. Even households, with young children, do not want to see changes to the Queen Elizabeth field, to incorporate a new school. They would rather keep the field, but only better maintained. They all thought that the field was in trust, there for ever and could not be changed. I personally attended a Council meeting on the 10th July 2018 and presented both questions and statements. Some of the questions have since been kindly answered in an e-mail dated the 12th October, from Mr. Toby Sturgis, Cabinet Member for Spatial Planning, Development Management &amp; Property, others are still outstanding. I will now, if I may, go through those questions and statements, expanding on them, after receiving some answers and drilling down into the well-hidden council web-site for further details provided in the Appendix 3. Note on Elm Grove Field and Implications for Asset Transfer. The Queen Elizabeth Field: It states, among other things that, The Queen Elizabeth II Field, known as Elm Grove Field, is owned by Wiltshire Council and comprises a playing field of approximately 2.85 hectares. It includes a small play area in poor condition and a basketball hoop. No marked out pitches, as it is very wet, unsuitable for team sports. Its current use appears to mainly be for dog walking. In response to the statement, I would like to emphasise that the main reason it is used mostly by dog walkers, is due to the fact that the field has been very badly maintained, the ditches have never been cleaned out, and hence the drainage is very poor. The grass has not been cut on a regular basis and when it is cut, it is left to rot, making it impossible to play on. Only certain sections of the field were cut, the rest left to grow very long, too long for children to be able to play on. That changed a month or so ago, when the proposed plan came to the notice of some of the local residents, it has since been cut more often and the cut included the whole field. This maybe suggests it was deliberately left so that it became unplayable, which then enabled the council to say it was only used by dog walkers. The hedges around the</p>			

field are now being trimmed back, the first for a very long time, (10 years has been mentioned). Attached pictures No's 1-4 show the state of the area at times. A fund of £20k, available under an S106 agreement, from the development of the WWDC Offices, has not been used. It could have been spent on up grading the playing equipment, so that it would have been utilised more. The rough draft that I have seen of the plan, for the field, does not offer the open space that the present area does. The inclusion of football pitches, gymnasium, car park, changing rooms, eats into the area, thereby not offering the same freedom of open space for children, adults and dog walkers, as there is at present, provided the current area was maintained well. Plus the fact that the area is the only open space this side of town, it's on the perimeter of an established residential area, offering tranquillity and nature, rather than having to travel miles, which only adds to the current air pollution and traffic problems of Trowbridge. Even the government is stating that we all need to exercise more and by recent media reports, the whole country is stating that we should retain our parks and playing fields. Parks and green spaces are proven to help people, both physically and mentally. Places where they can walk, breathe fresh air, run and play. They are an important tool to drive social cohesion, combat loneliness and build community spirit. Don't destroy that tool. I mentioned nature, the following list highlights the different wildlife that survives in and around the field. Herons, Woodpeckers, Cuckoos, Bats (Pipistrelle), small Deer, Foxes, Newts (in the ditches), Hedgehogs, Field Mice, plus all the common birds frequent the field. Even a Stork has been seen flying over. Access to the field off Wiltshire Drive: The planners state that access is sufficiently large that it can be used for construction traffic. I would totally disagree with this statement, Wiltshire Drive is at times a very dangerous road. There have been 14 accidents, (see attached record), between Ramsbury Walk and Dursley Road, 12 of which have occurred between Ramsbury Walk and Champion Dive, dead centre of these two roads, is the proposed entry to the field. The accidents were varied, with pavements mounted, walls knocked down, collisions with parked cars, even a car hitting the front wall of a house and one demolishing a telephone junction box. Speeds of over 60mph have been officially recorded. Wiltshire Drive is currently seeing an increase in traffic, as more are using this as a rat run, from the town centre, to Bradley Road and beyond. It would see an even greater increase should all the proposals go ahead. The Council should have correspondence from 2004, when a planning application, by the Council, was turned down by the Highways Officer, on three issues: a). the possibility of overspill parking on the surrounding roads, which in this current proposal would be cars dropping and collecting school children. b). It stated that visibility, to the left, for emerging traffic did not meet the required standard. c). The site has insufficient frontage to the south-west to enable an access to be satisfactorily laid out incorporating the necessary visibility splays which are essential in the interests of highway safety. Attached pictures No's 5-9 detail the problem. The correspondence also said that overspill parking would cause complaints and conflict with residents, as the latter would find their roads and drive ways congested with cars. This was based on the fact of anything over the number of persons using the one football pitch was unacceptable. The number of children being brought into the school would be greatly over and above this number. A recent national survey shows that 50% of children are transported to school. Information says that Wiltshire Drive was purposely designed, with its bends to stop parking and speed, on this type of road. People parking would not even give this a thought, it would be a matter of, park as nearer to the entrance as possible, I won't be long dropping / collecting the kids. Too suggest that large construction Lorries and even more traffic, than was mentioned in the plan at that time, now be given access to the site, surely this would not reach the present required safety standards. Established trees would be destroyed in the access area, as it's not wide enough for large Lorries to pass through, without damaging the branches. Attached picture No. 10. There is also a Public Right of Way footpath down the centre of the access area. Attached picture No. 10. If access was deemed necessary to the site, would it not make sense to build the proposed road for the new housing development first? Starting at the KFC roundabout and going through the development to join up with Dursley Road. Even access for a school could be provided by a turn off from the new road, thereby leaving the present entrance as a green area and eliminating the increased traffic problems on Wiltshire Drive. A method used when the Castle Mead new development was commenced. Do we need a new school?: In the Council document ref. SHLAA ref Site 613 and 248 it states that development proposals on this site would need to deliver a two form entry primary school. Correct me if I'm wrong, this would cover some 420 pupils, plus the necessary teachers, teaching assistants, cleaners etc. and a possible nursery attachment. We already have several schools in the area, not all are fully subscribed and the nearest, Holbrook, only a few minutes away, is not full, plus it has

	<p>the ground space for expansion. Take the national figures for new schools, where they say that new houses generate 1 primary pupil for every 8 new homes built. Taking into account the 250 houses to be built next to the school, plus the 79 at the top of Wiltshire Drive and the 31 on the land between Dursley Lane and the railway line, that's 45 pupils, not sufficient to demand a new school. To achieve full occupation of the school, pupils would have to be transported in from other areas, only adding to the already increasing traffic problems. Parents don't send their children to primary schools by bus, because of their age. They transport them by the family car. Noise levels. The noise levels for houses backing onto the proposed football pitches would increase considerably, from having a green field, to two football pitches, with 44 players, officials, supporters etc. shouting. The next thing will be floodlights erected, giving even more disturbance. Under this heading of noise, it is worth mentioning that one house in Sorrell Close, the side of which runs parallel to the proposed entrance and the rear facing the area for the proposed school, is run as a home for children with learning difficulties. The last thing they would want is the noise/ disturbance of construction Lorries driving past, they want calmness and tranquillity. Hence all the above goes against five of the planning's Sustainability Appraisal objectives: Numbers: 4.Improve air quality throughout Wiltshire and minimise all sources of environmental pollution. 5a. Minimise our impacts on climate change though reducing greenhouse gas emission. 5b. Minimise our impacts on climate change though reducing our vulnerability to future climate change effects. 7.Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place. 10.Reduce the need to travel and promote more sustainable transport choices. People's health is a major concern for the Country and will continue to be so, with its aging population The pressure for more money for the NHS and Old age care, will increase the demands on the Government and Councils, this can be helped by protecting green spaces for walking, relaxing etc. hence the Daily Mails petition for the following: A statutory requirement for councils to ring-fence funding for parks at £30 per household, per year. A legal duty for all green space to be managed to a good standard. New rules banning development on, or the inappropriate use of, parkland. A new central Government fun to provide emergency help for parks most at risk and ensure the long term future of Britain's green spaces. I hope that you will take into consideration all of the above points, the number of signatures collected from local house holders, before you agree with the proposed plan. [See attached].</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or</b></p>			

<p><b>previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	282	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1131898	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [Crudwell]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Application No 18/05429/FUL Comments There is no 5 year housing land supply problem in Crudwell and the most appropriate means to assess local needs and plan growth is through the fast developing neighbourhood plan. The NPs housing needs assessment has determined a local need for 20 to 25 new homes, the Neighbourhood Plan proposes to allocate land to meet that need. I cannot see good reason why this application should be successful and consideration should be given to the content of the NP, currently being worked on and close to completion. Traffic and potential flooding issues have not been addressed by the developer. Name [REDACTED] Address: [REDACTED] Date: 30/07/2018 Case Officer: [REDACTED]				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	283	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187735	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. This is a small village which falls in a conservation area. It is popular for walkers, bikers and tourists. This number of housing would definitely detract from the area and cause major environmental issues.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	284	<b>Consultee</b> Hannick Homes & Developments Ltd and Mr A Hawker	<b>Agent</b> Principle Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1133384	<b>Person ID:</b> 1128217	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC85				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Our clients support the amending of text at Paragraph 5.015 such that the area of land recommended for the expansion of Hullavington Primary School is the same as that in the text of Policy H2.11 of 0.2 hectares. Hannick Homes have been working with the Hullavington Neighbourhood Plan Steering Group and the local community with regard to the site identified at draft allocation H2.11. It has become clear through the course of consultations that the local community have aspirations to deliver additional community benefits at the site over and above those identified in Policy H2.11. Given the site is already allocated in the Wiltshire Housing Sites Allocation Plan for approximately 50 dwellings, and its location adjacent to the Primary School it is well placed to meet the communitys additional requirements which include the following; Additional off-street parking for the school to address current congestion problems experienced at pick-up and drop-off times An equipped childrens play area as currently there is no publically available play space in the village A public park/green space for the benefit of the whole village The SHLAA site 690, which is wider than the allocated site of H2.11 and comprises 3.8 hectares is able to provide the requirements of Policy H2.11 as well as to integrate the additional requests of the local community. However, in order to be able to release additional land for car parking to serve the Primary School adjacent to The Street, to retain and enhance the existing public rights of way that cross the site, to provide the 0.2ha for school expansion and to provide the necessary open space and drainage attenuation to serve the site, it will be necessary to increase the area for development over and above that allocated at Policy H2.11. This matter is being addressed through the Hullavington Neighbourhood Plan and will result in a proposal that can deliver the following benefits for the village of Hullavington; Land reserved for the the expansion of the adjoining primary school (0.2ha) as required by Policy H2.11 Improvements to the junction of The Street and Norton Road which have been confirmed as acceptable with the Highway Authority to meet the needs of up to 70 additional dwellings at the site. About 28 affordable dwellings (40%) to meet local needs A new off street parking area for the school to address congestion in The Street at drop-off and pick-up times and when events are run at the school A new public parkland along the watercourse for use by the whole community, currently excluded from the boundary of Policy H2.11 Ecological enhancement along the watercourse corridor within the parkland and across the site, particularly with regard to the Barberry moth. A new equipped childrens play area and informal natural play features within the new parkland for use by the whole community Circular walk for residents within the parkland and the historic public right of way crossing the site, with an enhanced green corridor link to the The Street The allocation being pursued through the Hullavington Neighbourhood Plan, and previously submitted for consideration to the WHSAP Reg 19 consultation is shown on the Concept Plan (November 2018) at Appendix 1.</p>			

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	5132894		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	Yes	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	Yes

<b>Comment ID:</b>	285	<b>Consultee</b> Town Planner Network Rail	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 408291		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC43				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Thank you for consulting us on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan on 27 th September 2018. This email forms the basis of our response (please confirm receipt of this email). We would like to reiterate those comments initially made in our email dated 15 th September 2017, made to the Council on the Pre-Submission Draft of this Plan document. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. With this in mind we would strongly urge that when the council undertakes its viability testing for any proposed allocated site it considers the impact the proposal may have on the railway infrastructure. The cost of mitigating any impact may have a bearing on the viability and deliverability of any such proposed site. In particular the following allocated sites / policies will almost certainly have an impact on the level crossings listed below. Policy H1.1 Empress Way The following level crossings will be impacted: €□ Berrys Public Footpath Crossing. This may be resolved by diverting the PROW over the proposed connecting highways link between Empress Way and Simonds Road. Details of the crossing can be found on our website <a href="http://archive.nr.co.uk/Transparency/LevelCrossingItemDetail.aspx?Icid=2354&amp;name=Berrys&amp;View=onList &amp;postcode=&amp;radius=">http://archive.nr.co.uk/Transparency/LevelCrossingItemDetail.aspx?Icid=2354&amp;name=Berrys&amp;View=onList &amp;postcode=&amp;radius=</a> Network Rail is a statutory undertaker responsible for maintaining and operating the countrys railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rails infrastructure. Level Crossings The level crossings which appear to be affected are listed above and give detail of the type of crossing. Any development which would result in a material increase or significant change in the character of traffic using these rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission. Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned by the impact the proposed site allocations would have on the safety and operation of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail. Councils are urged to take the view that level crossings can be impacted in a variety of ways by development proposals: By a proposal being directly next to a</p>			

	<p>level crossing By the cumulative effect of development added over time By the type of crossing involved By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing By developments that might impede pedestrians ability to hear approaching trains By proposals that may interfere with pedestrian and vehicle users ability to see level crossing warning signs By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing. Councils are urged to take the view that level crossings can be impacted in a variety of ways by third party planning proposals which are further detailed in Appendix 1 attached to this email. It is Network Rails and indeed the Office of Rail Regulations (ORR) policy to reduce risk at level crossings, not to increase risk, as could be the case with an increase in usage at the level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions. The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway: <math>\text{€}</math> (Schedule 5 (f)(ii) of the Town &amp; Country Planning (Development Management Procedure) order, 2010) to requires that where a proposed development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over the railway (public footpath, public or private road) the Planning Authoritys Highway Engineer must submit details to both Her Majestys Railway Inspectorate and Network Rail for separate approval . We would urge that information is provided within each policy to identify the need to either close the crossing and divert the public right of way or to improve the crossing, i.e. provision of a bridge. Any future proposals must be supported by a detailed Transport Assessment which assesses any potential impacts on the railway and detail anymitigation proposed. We would appreciate the Councils providing Network Rail with an opportunity to comment on any future planning policy documents as we may have more specific comments to make (further to those above). We look forward to continuing to work with you to maintain consistency between local and rail network planning strategy. We trust these comments will be considered in your preparation of the forthcoming Plan documents.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation</b></p>			

<p><b>stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	286	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187741	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			



	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional comments serious impact on visual image to approach to village from west along B3098 potential for overloading sewage pumping station due to excessive development - check situation with Wessex Water Inadequate public transport to provide sustainable means of coping with increased demands from residents of new development</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	287	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 640295	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional comments Whilst there is a need for more social housing, a development on this scale is out of keeping and based on need, unnecessary. A small development on site site 321 would be beneficial if affordable housing is included, but anything on a larger scale would bring access problems on the B3098, which is already very busy. Any development on site 738 would damage the landscape so close the escarpment and the White Horse, and be out of keeping. As the basis for these proposals is flawed, based on inaccurate data, I do not understand why this is still under consideration. In addition, more pressure on the surgery and school would bring additional problems.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			

<p><b>proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	288	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187743	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional comments We have no objection to a maximum of 10 houses being constructed, but such a huge building programme, in addition to other developments in the village i.e. in the Butts, would radically change the dynamics and security of the village. The landscape is unique and the additional traffic will be dangerous.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	289	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187746	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional comments New housing should be restricted to 'brown field' sites in cities and towns and not 'green belt' areas around already overcrowded villages such as Bratton. I am totally against the proposal for new housing in Bratton.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	290	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187747	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	291	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187748	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional comments I'm particularly concerned that the new developments will result in a build up of traffic and put more pressure on the surgery, it's difficult enough at the moment to get a doctor's appointment within a reasonable time.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			



<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	292	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187750	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	293	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187751	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	294	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187752	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			



	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	295	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 645824	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>				

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	296	<b>Consultee</b> Hannick Homes & Developments Ltd and Mr A Hawker	<b>Agent</b> Principle Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1133384	<b>Person ID:</b> 1128217	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Effective	
<b>Identify Proposed Change Reference Number</b>	PC86				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Proposed change PC86 is correct as it removes reference to land that lies outside the allocated site for Policy H2.11. However, the evidence that it refers to the Pegasus consultation response to the Regulation 19 WHSAP consultation (September 2017) - argued for an increase in the site size of the allocation to 3.8ha as per SHLAA site 690. This wider site would have included the area for which text is now proposed to be deleted from the plan. The consultation response did not provide an evidence base that required the deletion of the text from the plan it merely pointed out that it would not be possible to provide public open space and biodiversity enhancements along the corridor of the watercourse as part of a comprehensive scheme if this land was not included within the allocation. The submitted WHSAP (July 2018) does not increase the size of the allocated site at Hullavington under Policy H2.11 and it is submitted that leaving the field to the west outside of the allocation means that the opportunity is lost through the Local Plan making process to secure open space and biodiversity enhancements for the benefit of the local community. This matter is now being addressed through the emerging Hullavington Neighbourhood Plan, in accordance with paragraph 13 of the NPPF (2018). By working closely with the local community to bring forward sustainable development the infrastructure requirements of both the emerging allocation H2.11, and the identified needs of the local community which are not addressed by H2.11, can both be met. The Concept Plan (November 2018) for the site is attached at Appendix 1. By working collaboratively with the local community our client will ensure a development that delivers significant community benefits to this large village in the Chippenham Community Area as well as new open market and affordable housing that helps contribute to the five year housing land supply of the authority on adoption of the plan.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5133348</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	297	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187739	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Re: 04 EXAM 01 Schedule of Proposed Changes (Sept 2018)_1of46_SPC.pdf(page 1of60) PC92 - Crudwell I am writing to strongly support the proposed change to remove the Ridgeway Farm site from the Wiltshire Housing Site Allocations Plan, on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	298	<b>Consultee</b> Hannick Homes & Developments Ltd and Mr A Hawker	<b>Agent</b> Principle Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1133384	<b>Person ID:</b> 1128217	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC 87				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC87 concerns the insertion of additional wording at paragraph 5.107 concerning Policy H2.11 The Street Hullavington in so far as it relates to concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for development sites as well as groundwater. Our client is aware of the requirements of the Environment Agency with regard to flood risk and groundwater protection at the site. This matter will be addressed in any forthcoming planning application by the submission of a Flood Risk Assessment and additional supporting information comprising a Groundwater Risk Assessment to demonstrate that any proposed development will comply with Core Policy 68 (Water Resources). Initial research indicates that the EA requirements with regard to groundwater do not pose any risk to the development of the site and that all matters relating to potential pollutants; surface water runoff and mitigation can be conditioned on an outline planning permission.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	299	<b>Consultee</b> Hannick Homes & Developments Ltd and Mr A Hawker	<b>Agent</b> Principle Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1133384	<b>Person ID:</b> 1128217	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC 14				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>SBR PC 14 proposes to include the existing Hullavington school playing field within the Settlement Boundary for the village. Pegasus Group made specific representation on this matter on behalf of our client, Hannick Homes, to the Wiltshire Housing Sites Allocation Plan Regulation 19 Consultation under cover of letter dated 21st September 2017 seeking the inclusion of the playing field within the settlement boundary for the village. Our client supports the proposed amendment SBR PC 14 to the Hullavington Settlement Boundary. Our client also supports the Councils view on the role of Neighbourhood Plans in determining settlement boundaries as referred to in the WHSAP Topic Paper 1 Settlement Boundary Review Methodology July 2018 which states at paragraph 7.29, Neighbourhood plans submitted subsequently will still be able to consider their own settlement boundary through the neighbourhood planning process. Once a future neighbourhood plan is made, its settlement boundaries will then supersede those in the Plan. Hullavington Neighbourhood Plan (HNP) is at an advanced stage of preparation and is due to be submitted imminently to the Council under Regulation 15 of the Neighbourhood Planning Regulations. The HNP proposes a settlement boundary that has been subject to extensive consultation with the local community and seeks to ensure sufficient land is included within the settlement boundary to ensure the provision of new community infrastructure highlighted through local community consultation exercises. WHSAP Topic Paper 4 Developing Plan Proposals Addendum (July 2018) states at paragraph 5.4 that; The plan aims to compliment work carried out by local communities in progressing Neighbourhood Plans. Where Neighbourhood Plans have been made or are well advanced the Plan leaves the decisions on the scale and locations for growth in settlements to the communities concerned. Paragraph 5.12 states; In the rural areas, progress on neighbourhood plans since the estimated 2017 position has boosted supply in the Malmesbury and Chippenham Community Areas. This together with the proposed allocations at Large Villages in the HMA offers a healthy supply for the rural area in line with the Spatial Strategy. It is noted that the Hullavington Neighbourhood Plan when made will continue to ensure that supply in the Chippenham Community Area is met and maintained and will carry the weight of having been approved by a community referendum.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018)</b>		

<b>document this representation relates to:</b>		<b>or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	300	<b>Consultee</b> Hannick Homes & Developments Ltd and Mr A Hawker	<b>Agent</b> Principle Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1133384	<b>Person ID:</b> 1128217	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Main Report (EXAM/02A)		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	Exam/02A details changes to the Sustainability Appraisal as of September 2018. Changes to the text are clearly shown in bold and underlined . The Sustainability Appraisal (SA) of the site for Policy H2.11 The Street Hullavington is detailed at pp. 275-276	
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

Comment ID:	301	<b>Consultee</b> <b>Person ID:</b> 1187740	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b> No
				<b>Do you consider the Proposed Change to be sound?</b> No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy
<b>Identify Proposed Change Reference Number</b>		PC94		
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement		



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Bratton has already had two large estates built, The Tynings and Manor Fields, plus a considerable number of infill developments e.g. Cassways Orchard and Reeves Piece. Together with recent large scale developments in nearby Westbury this area has already more than done its part regarding extra housing. No local employment either, so more pressure on the already overcrowded road system. Surely developments on these two greenfield sites should be banned.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	302	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187922	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the removal of the site at Crudwell from the WHSAP. The reason for this is that in the wider context of completions that have already occurred in the Malmesbury CA over the WCS plan period, there is no longer a strategic need to allocate a site in the community area through the WHSAP. Given that good progress has been made on the preparation of the Crudwell Neighbourhood Plan, which seeks to allocate sites, evidence indicates that the Council can defer housing allocation options to be developed through the emerging neighbourhood plan, rather than through the WHSAP the WHSAP.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	303	<b>Consultee</b> Consultant Land Development & Planning Consultants Ltd	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 162663		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective	
<b>Identify Proposed Change Reference Number</b>	SBR PC14				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Further to comments made in relation to the pre-submission document, the suggested amendment to the settlement boundary at Hullavington does not include land adjacent to the public house which represents a clear infill opportunity in a sustainable village location. The proposed boundary further restricts rural development opportunities and as such is neither justified or positively prepared. The local planning authority will be aware that a planning application is currently under consideration for residential development of this land; ref 18/09895/FUL. Attached hereto are the documents supporting the proposals.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>	5132896				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

Comment ID:	304	<b>Consultee</b> <b>Person ID:</b> 1187740	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b> No
				<b>Do you consider the Proposed Change to be sound?</b> No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy
<b>Identify Proposed Change Reference Number</b>		CATP/19		
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement		

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Bratton has already had two large estates built, The Tynings and Manor Fields, plus a considerable number of infill developments e.g. Cassways Orchard and Reeves Piece. Together with recent large scale developments in nearby Westbury this area has already more than done its part regarding extra housing. No local employment either, so more pressure on the already overcrowded road system. Surely developments on these two greenfield sites should be banned.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			



<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	305	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 646571	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	306	<b>Consultee</b> Clerk to West Tisbury Parish Council West Tisbury Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1121411		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC42				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Proposals for revised Settlement Boundaries Proposed change SBR PC4 (8-E/F) Residents have brought to the attention of West Tisbury Parish Council their concerns at the proposed revised changes. Please could direct consultation take place with all the owners of adjoining land/properties to the said proposed area for change, including a site visit. Also, could Wiltshire Council please clarify the status of the various pieces of land and their usage within the revised proposed areas of change. We await to hear from you in the near future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	307	<b>Consultee</b> Hannick Homes & Developments Ltd and Mr A Hawker	<b>Agent</b> Principle Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1133384	<b>Person ID:</b> 1128217	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Annex I Chippenham Community Area (EXAM/02A.1)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p>Exam/02A details changes to the Sustainability Appraisal as of September 2018. Changes to the text are clearly shown <b><u>in bold and underlined.</u></b></p> <p>The Sustainability Appraisal (SA) of the site for Policy H2.11 The Street Hullavington is detailed at pp. 275-276 of the document with a summary of changes to the Policy as a result of the SA detailed at pp.293-294.</p> <p>Paragraph 8.3.149 is clear in stating that the SA relates to SHLAA site 690 (the wider site which comprises 3.8ha).</p>				

**Assessment Addendum  
(September 2018).**

Paragraph 8.3.150 states that;

**'The site has been reduced in capacity to approximately 50 dwellings since assessed against the SA Objectives, which addresses some of the sustainability issues identified in relation to SA Objectives 3 and 5b'.**

Paragraph 8.3.152 states that;

**'The moderate adverse effects in relation to SA Objective 3 and 5b is addressed by the Submitted Schedule of Proposed Changes which requires a Flood Risk Assessment and comprehensive drainage strategy for the site'.**

These comments all relate to the wider SHLAA site 690, they refer to a reduced capacity across the wider site, they do not suggest that the site area should be reduced or that the reduced quantum of dwellings should be provided on a smaller site. Moreover, our client has submitted in their response to PC87 that the issues raised by SA Objectives 3 and 5b can be covered off by condition on an outline planning permission.

However, WHSAP Policy H2.11 is for a smaller site than SHLAA site 690 and neither Exam/02A nor Exam/02A.1 provide any reasoned justification for a reduction in the physical size of the site from the SHLAA site size of 3.8ha.

Indeed Exam/02A.1 states at the summary of SA Objective 8 that

*'The whole SHLAA site provides capacity for approximately 86 residential units (though this may be reduced through the mitigation set out in this assessment), which contributes towards Wiltshire's housing supply. A development on this site would help to meet local housing needs in accordance with the policies of the Core Strategy, and has the potential to deliver a significant level of affordable units alongside the open market units. Overall it is considered that allocation of this site would have a major positive benefit in terms of meeting the aim of SA Objective 8'.*  
(emphasis added)

Exam/02A.1 states that;

*'There is potential to introduce pollution prevention measures, including sustainable drainage measures (SuDS) to control the risk of surface water flooding'*

however, by reducing the site area to only that proposed by Policy H2.11 the ability of the wider site to make a 'major positive benefit' is compromised, as is the ability of any scheme to provide a comprehensive SuDS scheme that drains to the tributary of the River Gauze located to the north west of the site.

Our client has undertaken extensive pre-application investigation with regard to constraints at the site including drainage matters. This initial work has demonstrated that the wider SHLAA site 690 can provide up to 70 dwelling units plus additional community infrastructure required by Policy H2.11 and the local community.

The allocation of the site is being pursued through the Hullavington Neighbourhood Plan as well as through the WHSAP. The Concept Plan (November 2018) for the site is attached at Appendix 1 to these representations.



	It is considered that Exam/02A and Exam/02A.1 do not provide a well-argued reasoned justification for a reduction in capacity of the wider SHLAA site 690 from 86 dwelling to 50 dwellings hence there is no SA justification for a site allocation that is smaller than SHLAA site 690.		
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	308	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 758096	Senior Planner Fowler Architecture & Planning Ltd  <b>Person ID:</b> 758092	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC40				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The landowner and promoter of proposed allocation H1.1 has no objections to the additional text specified in PC40. The landowner and promoter did not submit any comments in this particular matter on the previous stage and this seeks to clarify his position in response to the Southern Water consultation response.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	309	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 758096	Senior Planner Fowler Architecture & Planning Ltd <b>Person ID:</b> 758092	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC41				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The landowner and promoter of proposed allocation H1.1 does not object to the amendment to the last sentence of paragraph 5.19. It is important that the scope for the Transport Assessment determines the trigger point for the delivery of the access via Simonds Road. The scheme for the provision of the Road Link Land should be submitted as part of the reserved matters. The restriction on occupation of dwellings relative to the trigger will be secured by means of planning condition.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	310	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 758096	Senior Planner Fowler Architecture & Planning Ltd  <b>Person ID:</b> 758092	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC42				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The landowner and promoter of proposed allocation H1.1 agrees with the clarification in PC42 concerning the delivery of the school land. Illustrative Masterplan 140405/02 was submitted to Wiltshire Council on 28th March 2018 showing the revised location of the primary school land in the south east corner of the allocation extents. This revised position would enable the land to remain in agricultural use until such time as it was required within the requisite period. The landowner and promoter did not submit any comments in this particular matter on the previous stage and this seeks to clarify his position in response to PC42.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5133366				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	311	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 758096	Senior Planner Fowler Architecture & Planning Ltd  <b>Person ID:</b> 758092	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Effective	
<b>Identify Proposed Change Reference Number</b>	PC43				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The landowner and promoter of proposed allocation H1.1 wishes to comment that Public Right of Way LUDG34 does not exist within the extents of the allocation. No reference should be made to LUDG34 within the 5th bullet point. The removal of reference to LUDG34 would overcome the soundness issue concerning the effectiveness of the policy. The illustrative masterplan does not propose any diversion of LUDG1. The illustrative masterplan proposes the partial diversion of LUDG2 along the eastern boundary before rejoining the existing route. The wording 'retention and enhancement' is supported as it does not restrict the route of LUGD2 to its current alignment and would not preclude the partial diversion of the right of way within the allocation site, if required in the interests of masterplanning and ensuring the development does not lead to a net loss of recreational amenity. The landowner and promoter did not submit any comments in this particular matter on the previous stage and this seeks to clarify his position in response to the Natural England consultation response.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	312	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 758096	Senior Planner Fowler Architecture & Planning Ltd <b>Person ID:</b> 758092	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC44				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The landowner and promoter of proposed allocation H1.1 does not object to the additional wording within PC44 to address concerns raised by the Environment Agency. The landowner and promoter did not submit any comments in this particular matter on the previous stage and this seeks to clarify his position in response to the Environment Agency consultation response.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	313	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187749	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should see k to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport. The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its</p>			

	<p>pavement and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	314	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 703786	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should see k to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport. The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its</p>			

pavement and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. [REDACTED] - Additional comments to Bratton Site allocation Plan - Form A Normally a council will make the excuse that they are following government requirements but in this case they have shown a total disregard for them in 'planning' for far more houses than guidelines suggest: up to around 5 to 6 times more than their own core strategy! They appear to be bowing down to the wishes of developers rather than to the voices of the people within their area. They do not support Bratton at all, either directly or indirectly. The heavy goods traffic through the village is unacceptable because they will not take the necessary action to restrict the weight limit. Congestion around Westbury due to a lack of council action is causing Bratton to be rat run with traffic travelling at totally unacceptable speeds with no policing at all. All these houses will only increase this problem. A number of very questionable actions by the planners has led me to question their ability and indeed integrity. Actions by them in this case only go to support this view: errors in number of houses and amenities in village, classification of village, delays in issuing paperwork thereby reducing response times, changes in numbers of new houses in planning applications, and sudden inclusion of new developments without proper process or notification. Bratton was a very nice village in a mainly conservation area. All these developments in addition to those already authorised will spoil this rural community. Why do we need all these houses when Westbury, only 3 miles away, has already agreed to over-commit to by 291 houses! Do not progress site 321 at all and reduce Site 738 as much as possible to closer to the figure for a Small village ie less than 10.

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-</b></p>			



<p><b>submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	315	<b>Consultee</b> D2 Planning	<b>Agent</b>  <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 420889		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC102				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Bovis Homes control some 63ha land to the South of Netherhampton Road which is allocated for up to 640 dwellings allocation H3.1 and also control further land to the North of which 100 dwellings are allocated, under allocation H3.3. Land to the South will comprise up to 640 dwellings, employment, Primary School, Open space and landscaping Land to the North will comprise of around 100 dwellings Bovis have been in continuous discussions with the Council regarding the land under their control during the preparation of the Site Allocation DPD. Furthermore, they have submitted representations in respect of the pre Site Allocation DPD which concludes that their land is suitable, available and deliverable for development within the Plan period. Bovis will continue to work with the Council and other statutory consultees and other interested parties in bringing forward their site. Indeed, they are in the process of preparing a planning application for the land to the south of Netherhampton Road. Finally, Bovis have considered the various Main Modification in respect of Salisbury and we note that there are no Main Modifications which affect either of the site allocations under Policies H3.1 and H3.3.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	316	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1131754	Planner  <b>Person ID:</b> 1131747	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>		None			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Consultation on Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan Harnham Trading Estate, Salisbury, SP2 8NW Thank you for providing us with the opportunity to engage with the consultation on the Councils Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan (the Plan). We write on behalf of our client, Legal &amp; General Property Partners (Industrial Fund) Limited and Legal &amp; General Property Partners (Industrial) Nominees Limited ("Legal &amp; General"), who have an interest in the Harnham Trading Estate, Salisbury. As way of a reminder, the Council published its pre-submission version of the Plan in July 2017. The Council is proposing to amend the settlement boundary of Salisbury to include the site. The site has not been given a housing allocation for two reasons: 1) the Council states that it will apply a presumption in favour of sustainable development within the settlement boundaries so it considers it unnecessary to allocate sites within the settlement boundaries for development; and 2) the site is already a committed site being a non-designated employment site. In September 2017 we submitted representations to the Council on behalf of our client relating to the pre-submission version of the Plan (Representation Number 2120). We requested that the site be allocation for housing for the reasons set out in the representations (which are enclosed with this letter). In July 2018 the Council submitted the Plan along with a Schedule of Proposed Changes to the Secretary of State for independent examination. With regards to the Schedule of Proposed Changes to the Plan, no changes are proposed to the site. As set out within our previous representations, the continued use of the site at Harnham Trading Estate for commercial use is not considered to be appropriate. The Councils Employment Land Review recognised the poor quality of the site and commercial spaces as well as the constraints on ongoing commercial use as a result of conflicts with neighbouring residential dwellings. Overall the Employment Land Review concluded that the site could be released for non-employment uses. The redevelopment of the site for alternative uses would have significant regeneration benefits. Redevelopment of the site for residential development would help to significantly boost the supply of homes as sought by Paragraph 59 of the NPPF and is considered to make the best and most efficient use of this sustainable and accessible brownfield location. Residential development of this brownfield site within a Principal Settlement is supported by national and local planning policy. In addition, the allocation of adjacent sites for residential development further supports that the location to the west of Harnham is suitable for the delivery of new housing. The site is considered to be suitable, available and deliverable for the development of up to 80 new residential dwellings. As such we consider that the site should be allocated for residential development within the Plan. Future Participation We trust that the above is of assistance in the preparation of</p>				

	the Plan. We would like to be kept up to date with the progress and look forward to further opportunities to engage. We look forward to confirmation of receipt of these representations. Please feel free to contact me if you have any queries or if you would like to discuss.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	317	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1133437	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional comments In addition to all the above comments to which I subscribe, I recently narrowly avoided being knocked down by a car outside my property whilst crossing the B3098 to access the pedestrian walkway on the opposite side and running along the edge of the site 321. This was due to restricted line of sight and the speed of passing traffic. This restricted line of sight also makes egress by car from my property rather 'dicey' as it is without any increased traffic from the proposed developments.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	318	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187756	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional comments The amount of traffic on the B3098 is already at an unacceptable level. The front of this property is regularly damaged by large vehicles passing each other on the narrow road. Either or both of the mentioned developments would irreversibly alter the nature of this rural community, which already does not have any further prospects for employment, so necessitating the emptying of a large part of the dormitory by road every day, and vice versa every evening.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	319	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187766	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	320	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187769	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional comments We agree with the above comments that the proposed developments are disproportionate to the village size. As Bratton is a village with just over 500 houses adding an additional 57 houses will alter the balance particularly as there is no extra employment within the village so new residents will require transport to neighbouring towns. Transport access at these sites both for potential construction vehicles and later for residents' cars is very poor along this narrow section of the B3098 and will represent a hazard. It seems unnecessary to build so many houses in Bratton when Westbury already has an oversupply of houses and is still building. There has already been considerable development in Bratton in recent years and infilling taking place.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			



<p><b>proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	321	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187772	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	322	<b>Consultee</b> Clerk Yatton Keynell Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126488		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC16				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Yatton Keynell Parish Council is unanimously opposed to the proposed change to the settlement boundary - July 2018, as set out in Table 14 Proposed changes to the Yatton Keynell Settlement Boundary SBR PC16 The current settlement line is properly aligned with the current building line of the property including the garden and is already consistent with approach adopted the neighbouring properties. More notably this approach of tying in the settlement boundary to the building line has been consistently applied elsewhere in the village resulting in larger plots of land attached to certain properties moving outside the settlement boundary. It is therefore contrary to and inconsistent with the approach adopted elsewhere in the village to allow part (approximately 1/2) of what is more correctly described as a paddock to be sited within the settlement boundary. It is clear that this request has been made simply to help facilitate the approval of a previously rejected plan to build a single dwelling on the plot and to circumvent earlier objections.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	323	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1131542	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. * The development would be outside the village boundary - encroaching on a valuable green belt of land. * The development will be the most densely populated housing estate in Bratton - entirely not in keeping with the village style. * It would have a terrible effect on the conservation area of the parish, impacting the views from higher ground and the White Horse. * It would dramatically and adversely impact on local amenity/infrastructure. ALREADY IT IS NEARLY IMPOSSIBLE TO MAKE AN APPOINTMENT WITH A DOCTOR. * The local road system is already dangerously overloaded. Try cycling through the village on the B3098, a busy road that has seen 49 reported collisions (11 "serious") since 2000. * As a supporter of Wiltshire Wildlife I must also point out the loss of habitat for the hedgehogs, slow worms and bats in the area. * I am concerned about the drainage. Already the development site cannot cope with surface water and causes excess water to run down into the housing estate below it. With dwelling on the site there would be even less soakaway. * The Bratton Parish Council seem to agree as it recently voted overwhelmingly to reject the proposals. How can Wiltshire Council override this decision? Particularly as Planning permission has twice previously been rejected on the grounds that a housing estate in this location would represent "a substantial intrusion into the rural landscape".</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation</b></p>			



<p><b>stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	324	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>		N/A [H2.4]			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>COMMENTS RE WILTSHIRE HOUSING SITE ALLOCATION PLAN HOUSING ALLOCATION H2.4 - CHURCH LANE, TROWBRIDGE. There are three main reasons why I consider this site should not have been selected for development in the Wiltshire Site Allocation Plan. Point 1. Housing development on this site will cause considerable, damage to the water quality and biodiversity of the RIVER LAMBROK as it runs through this site. Resulting in an irreversible loss of species at a time when: a) Wiltshire Council is applying for Local Nature Reserve Status for Southwick Country Park which borders this site. b) The Environment Agency, as part of the Bristol and Avon Catchment Plan, have targeted an increase in water quality in the RIVER LAMBROK from Moderate to Good by 2027 in line with the UK Government aims to ensure all waterbodies meet good Ecological Status by 2027. The RIVER LAMBROK lies at the foot of this sloping site and is all that separates the site from Southwick Country Park. It is home to a diverse range of flora and fauna that includes endangered and protected species including water voles, kingfishers, otters, grass snakes and rare species of plants and insects. Nine species of bats and thirty nine identified species in the park are directly dependent on the RIVER LAMBROK. (See appendix 1, 2, and 3.) This site is too small to accommodate 45 homes, gardens, roads attenuation areas etc. without encroaching too closely on the RIVER LAMBROK and its flood plain. Run off from housing development on this steeply sloping site would be difficult to mitigate. The use of trees, hedgerows and suitable grasses as natural attenuation will not slow drainage sufficiently to protect the LAMBROK on the steep slopes of its northern bank, where run off which is likely to carry oil from vehicles, salt from defrosting activities, herbicides and nutrient from garden run off and also all the accumulative effects of building work. Anything less than constructed wetland will result in pollutants reaching the RIVER. Climate change in recent years has led to prolonged periods of heavy rainfall causing an increase in widespread surface water and river flooding in Southwick and surrounding areas. Photographic evidence was provided to the Environment Agency after extensive flooding in winter 1004, Jan 2014 and July 2014. I believe their flood predictions were amended. Any increase in the flood zone 3 area on this site would risk attenuation areas becoming flooded and pollutants being washed in to the RIVER. Predation by pet cats and disturbances from children would be impossible to mitigate against and could cause considerable harm to protected wildlife species using the RIVER LAMBROK, rare bats found in the parkland and to wildlife in general using Southwick Country Park. Too often development close to the Lambrok river/stream seems to be considered in isolation. This waterway is a precious resource and should be considered as a whole. The Lambrok and its tributaries have flowed throughout Southwick for hundreds of years, from beyond the furthest southern point to the northern boundary of the parish and beyond to join with River Biss in Trowbridge. Bordered throughout much of its journey by ancient species rich hedgerows. This important wildlife corridor offers great opportunities for many wildlife species to move freely along the</p>			

	<p>length of this waterway to find food, shelter and nest sites, greatly increasing their chances of survival. Water voles are seen here and are known to move to deeper water at times of drought, Kingfishers are seen on numerous occasions, bats, perhaps Bechstein's follow the hedgerows and streams foraging for insects and recently it has been discovered that Otters, often recorded in the River Biss, use these waterways in Southwick to supplement their food source. In April 2016, despite requests that the River be surveyed as protected water voles were present, the river Lambrok at Wynsome Street was cleared by workman, from Thomas Brothers Group Ltd, who knew nothing of water voles and were given no instruction on how to avoid destroying their habitat and food source. Residents who had lived there for many years reported seeing 1 hundreds of water voles there in the past but now there are very few.' The Natural Environment White Paper describes the importance of a healthy natural environment to economic growth. Two of the four main objectives are: 1, Protecting and improving the natural environment and 2, Re-connecting people and nature. Perhaps this H2.4 Church Lane site would be better used as part of Southwick's proposed LOCAL NATURE RESERVE, to buffer and protect the RIVER LAMBROK, improve the local natural environment and to reconnect people and nature. Point 2: This site is at present a popular recreation area and is also used by dog walkers from a wide surrounding area. There are limited green spaces in this area and no direct access from here to Southwick Country Park. Point 3: A new road junction arrangement sited here, off the A361, will greatly increase the risk of serious accident on this already dangerous and at times extremely busy road. The A361 as it runs through Southwick and Upper Studley is known to carry very high levels of traffic at busy times of day.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5134368</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	325	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1122130	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Associated evidence documents		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				
<b>Please give details of why you support or do not support the updates to the</b>	Objections.				

**associated evidence documents.**

Changes, additions, amendments and deletions in (amongst others) PC94. Sites 321 and 738. Westbury Community Area Remainder. New OMISSION SITE OM007. PC21 (Statistics).

**1. Incorrect statistical basis:**

Table E.1 on page 43 (Number of dwellings in the village) is still wrong and has not been corrected in the Proposed Changes although many other paragraphs have been amended.

The table inserted below, taken from the earlier paper (which provided the basis for the Wiltshire Core Strategy) called the January 2012 WHSAP Topic Paper 3: Settlement Strategy , Appendices, Appendix B., shows the number of houses in Bratton as at 2006 as 506 and a current count in 2018 reveals 512, but the figures given in Table E.1 show 809. This is wrong by 303 dwellings, an error of more than half - 59.88%. This is one of the key basis for placing Bratton as a "Large Village" and is the keystone/critical figure on which other calculations are made, the size of any development and expansion is judged, and growth is calculated and compared with other types of settlement and place. Table E.1 has the figure for growth from 2006- 2026 (that is 26 houses in addition to the incorrect figure of 819) as 3.2% but this is wrong as it should be (26 houses above 506) 5.14%.

This flaw is repeated again with the re-inclusion and consideration of 22 houses at Site 738 in the Proposed Changes.

Table:	Bratton	Dilton Marsh	Edington/Tinhead
Dwellings:	506	643	296
Population:	1,260	1,900	330

FROM: Consultation January 2012, Topic Paper 3: Settlement Strategy , Appendices, Appendix B.

Relying on such an incorrect figure must cast doubt on the whole process of evaluation and the sustainability tests, and must result in flawed conclusions making the process unsound.

**2. Over achievement of housing development in the Westbury Community Area: Page 66 Table G.4 Step 2 paragraphs 2, 3 and 4:**

These new paragraphs inserted for Site 738 state that the development of 22 houses would "contribute towards the indicative housing requirements for the community area", and

"The indicative remaining housing requirements of 47 homes in the Westbury Community Area. The level of development on this site (738) is positive in terms of making a SUBSTANTIAL contribution towards the indicative growth targets.....and

approximately 20 dwellings on this site would contribute a MODERATE proportion of the anticipated level of housing growth for the Westbury Community Area, including much needed affordable housing for the village as set out in the Core Strategy".

But this is not the case. Reasons:

The most up to date housing figures show that the number of dwellings in the Westbury Community Area have already been exceeded. This means that the extra houses are not needed to complete the figures. The Government and the County quota in this area have been satisfied.

The figures are as follows from the July 2018 Submission pages – taken from “ Exam.01.45,Annex A:Proposed Changes to the figures in Section 4: Housing Delivery Strategy”.

*Proposed Change PC21 amends Table 4.10 on pages 26 and 27 of the WHSAP Document.*

*Westbury*

*Indicative Requirement 2006-2026: 1,500.*

*Completions 2006 – 2017: 940*

*Developable commitments 2017 – 2026: 851.*

*Total: 1,791.*

*% variation: 19% [end of table].*

Therefore, taking the Westbury Community Area as a whole, the building blocks of the Core Strategy *make* an over provision of some **291 dwellings. The figures in the earlier statistics also made an overprovision.** The failure to analyse this demonstrates that the development requirements have not been objectively analysed. Had they been it would have been recognised that no further allocation is necessary.

Therefore, 20 dwellings will **not be moderate** growth, when compared with an overachievement in the area. It will be **excessive** and without basis from the Core Strategy or the WHSAP doc.

ADD to this the number of houses on Site 321 (reduced to 35) one has an **over development of 57 houses.**

The argument remains the same for Site 321 **on its own.** As the quota has been satisfied 35 houses is also against the spatial plan of the Core Strategy for ordered growth and development.

Add to this the fact that the site size only allows for the development of 32 houses but this number has been increased to 35 to mitigate the use and loss of best agricultural land and it is clearly not modest growth.

The Core Strategy seeks to ensure that the development is carried out according to the hierarchy of settlements with the large towns at the top, followed by the market towns including Westbury, down to the non -strategic settlements of the Local Service Centres such as Market Lavington, and eventually down to the villages with the \large Villages above the Small Villages. To provide the development the County has been divided into areas and Bratton is in with Westbury town. The most recent statistics show that Westbury Town and the area as a whole have an excess, and therefore there can be no case for adding in more in an area which the strategy aims to keep rural such as Bratton. This is particularly important with the village being located on the "remote" north-west corner of Salisbury Plain within the Landscape Area and close to the Bratton SSSI, close to the White Horse and an area which can be seen from many miles away to the north and west, and is on the edge of the expanding developed/proposed developments on the edges of Westbury, Trowbridge (to join West Ashton and Yarnbrook) and Melksham. To throw in more houses in a village contrary to the strategy is unlawful.

**3. It is also directly against the Core Strategy.** Explanation:

The added proposed changes of Step 3 for Site 738 Table G.4 on page 86 are wrong in the following respect: Second paragraph: ".....As anticipated by Core Policies 1 and 2 of the WCS, the addition of approximately 20 dwellings would represent modest growth....". Policy 1 of the WCS specifically sets out that in the Large Villages there will be (Paragraph 4.15) "development will predominantly take the form of **small housing and employment sites within the settlement boundaries:.....small housing sites are defined as sites involving less than 10 dwellings (i.e. not a major application. Development outside of the settlement boundary will be strictly controlled.** [emphasis added] Relaxation of the boundaries will only be supported where it has been formally reviewed through a **subsequent DPD or a community led neighbourhood plan**, which includes a review of the settlement boundary to identify new developable land to help met the housing and employment **need of that community.**"..... [emphasis added]. Note: not adjacent or other communities.

Therefore to state as it does ..."as anticipated..." is self evidently wrong.

The new paragraphs added of 20-22 houses at Site 738 is not small housing of less than 10. 20 is double the amount. Double can can not be modest.



The same applies to Site 321. In the same way as above at Step 3 for Site 321, Table G.s page 62 it states".....As anticipated by Core Policies 1 and 2 of the WCS, the addition of approximately 40 dwellings would represent modest growth....". Again, it is not "as anticipated" and stating it to be so does not make it so. Further, 40 is four times the rate set out in WCS Core Policy 1. Clearly it follows that 40 is not "small housing", and at 4 times the rate provided by WCS policy it can not be "modest". This is unsound evaluation.

#### **4. Development within the Settlement Boundaries:**

Further WCS sees the development being **within** settlement boundaries including those boundaries as reviewed and amended by the WHSAP document, but the current review of the boundaries in the current WHSAP does **NOT** include extending the settlement boundary around Site 321 nor Site738 to include them. The boundaries are reviewed, yes, and the village settlement boundaries are rounded around the village, but not further to the extent to add in Site 321 or Site 738 or both. No lines have been added in for this in the Proposed Changes. Both Sites remain **outside** of the new proposed settlement boundary. This prevents the allocation of a site at this stage of the planning process. As such the Settlement Boundaries can be reviewed by the present Neighbourhood Plan currently being undertaken in the village, which has got to the stage of receiving its new Housing Survey. This is the process envisaged as the correct forum for local decision making in the LOCALISM ACT.

#### **5. Objections on evaluations and judgements: Site MO007 and Neighbourhood Plans.**

Dealing first and again with the numbers of dwellings in Site 738 introduced again in the Topic Paper for Westbury and the manner in which these are weighed up and compared with the existing and new paragraphs for Site321:

At STAGE 3 Sustainability scoring stage for both sites **Table F.3** on page 53 of the Westbury Area Topic Paper has been changed and Site 738 has been added. There is very little between the scores of both sites and both sites pass through this stage (Site 738 had been rejected previously prior to this stage). (i) on Sustainability **Objective 8** (Providing good quality, affordable housing and ensure an appropriate mix of dwelling sizes, types and tenures) Site 321 is given a score of Three Pluses and Site 738 is given two pluses, but when the WCS policy aims for fewer than 10 houses in Large Villages the number such as 20 and 35 are still in breach of the over arching Core Strategy Policy. Development in Bratton will result in more expensive housing than the same housing provided in Westbury, this is an unhappy situation but can not be ignored and is recognised in the fact that 40% affordable housing has to be provided in Bratton rather than 30% in Westbury and elsewhere in the area. It is unlikely that the housing will provide for all types of tenure, and unlikely in particular for secure long term affordable rented properties of the type which can be owned and rented by Housing Association landlords.

**SITE OM007: This site is owned by Bratton Parish Council.** This type of housing could be developed in Bratton within the centre of the village at a site which already has a new road containing mains services of electricity, gas, water and sewage, leading to a small social housing estate of 12 dwellings constructed about 20 years ago. **This site has been added to the Westbury Community Area Topic Paper and the Proposed Changes as Site OM007 for 15 houses .** This is a potential source of housing for rented and owned or part rented-part owned

housing on an affordable scale and the Bratton Neighbourhood Plan can consider this when developing the Neighbourhood Plan. This is the appropriate forum for making decisions at a local parish scale, either at the Council level or in the Neighbourhood Plan process as envisaged by the Localism Act. The importance of the Neighbourhood Plan process is emphasised throughout the WHSAP doc and it is one of the key purposes and objectives of the WCS to promote this.

The development of the Neighbourhood Plan is being progressed and some delay was caused by an approximate weight of four months for a County Liaison Officer to be appointed by Wiltshire Council.

See also Paragraphs at 8 below.

Continuing with the Scoring Results in **Table F.3 Stage 3** on page 53 and turning to **OBJECTIVE 10** (reduce the need to travel and promote more sustainable transport choices). Site 321 with 35 houses scores one negative and site 738 scores two negatives, yet it will be the larger Site 321 which produces more out commuting and a greater need to travel with increased private car use, noise and pollution. One reason for the WCS to have the hierarchy of development with development NOT being in the outlying villages (save for fewer than 10 houses and small plots) and the development being IN the towns with employment services shops and secondary schools is to prevent the increase in car use and the damage caused by climate change. Yet on this scoring system the larger the development and the more in breach of the policy a housing estate may be the better the score in this vital Stage 3. The measuring and evaluation stages are unsound.

Lastly, there is one other difference in the scores at Stage 3 shown in Table F.3 on page 53 with **Objective 11** (encourage a vibrant and diversified economy and provide for long term economic growth). Site 321 scores two positives and Site 738 scores one positive. We certainly do wish to ensure that the Village Shop, the village Public house and other small businesses in Bratton and Edington do thrive and a larger population in the village should hopefully help here. Houses within the centre of the village will be close to these and within safe walking distance. Housing at Site OM007 is one development which can be progressed locally. As for Sites 321 and 738, the paragraphs on both sites dealing with "accessibility" (see also below) both mention

"however residents are likely to to rely on the use of private vehicles to access a wider range of services and facilities further afield" (page 61 Site 321) and

"however residents are likely to rely on the use of private vehicles to access a wider range of services and facilities further afield" (page 65 Site 738).

The economic improvements may benefit the towns around to a greater extent than the villages and Bratton, as has been historically the case with decreasing shops and services in the villages. There is no reasoning behind or measurement of the "likelihood" in the information provided, yet the scoring between the two sites gives an extra plus to Site 321 (double the score of Site 738), that is that the extra new residents at Site

321 over and above the 20 at Site 738 will not drive to towns and will use the village shop, public house and services, contrary to the statement of "likelihood" set out above.

The other score points at Stage 3 are the same. The two sites are on opposite sides of the road to each other.

#### **6. Other evaluations and judgements are also unsound.**

Table 6.7. page 17 of the Community Area Topic Paper for WESTBURY states that SITE 738 (South side of the B3098 Westbury Road) the "overall sustainability benefits would be MARGINAL DUE TO THE lack of certainty that comprehensive and attractive routes for PEDESTRIANS and CYCLISTS are deliverable". This judgement is repeated at the Summary in Step 4 on page 67 of Table G.4 on Site 738. This judgement does not prevent Site 738 from going through to Step 5 of the sustainability assessment along with Site 321, but it does result in Site 738 being assessed very poorly as "marginal", and in Step 5 on page 68 Site 738 is removed and rejected (once again) from the Plan, the basis for this being "Generally, it should be the site option(s) that performs the least well using evidence from Step 4" that is rejected - see page 34 of Topic Paper 2 Site Selection Process Methodology Appendix 2, Stage 4a selection of preferred sites.

However these same factors (accessibility for pedestrians and cyclists) will apply to Site 321 on the other side of the road (North side) but they have not been weighed up in the same way or been given the same weight in the calculation of sustainability for Site 738. SEE page 61 boxes on Accessibility for Site 321 in the Westbury Area Topic paper. This is a a major omission in the considerations for Site 321 but also (later in the process), makes the decision making process of the Plan flawed and unsound with a different test being applied for Site 738. Cyclists travelling east from Site 321 to the village do not need to cross over the road whereas cyclists from Site 738 do need to cross, and on the return journey from the village travelling west the cyclists going to Site 321 would have to cross the road where the visibility to see oncoming traffic is poor, where as cyclists returning to Site 738 would not need to cross the traffic. This is not surprising but has not been considered at all. It must mean that both sites are equal on this issue, yet the information is judged sufficient to reject one site to the benefit of the other. Sustainability for Site 321 is judged as "good", a scale several points higher than "marginal" for Site 738.

Pedestrian access to the village from both sites will be problematic as the pavement to the village is poor on the north side of the road from the point of these sites up to the junction with Court Lane, and in turn the junction at Court Lane is not safe for children and young adults and difficult for all pedestrians, especially with children and buggies. Clearly for Site 738 there is the added need to cross the road at Site 738 to the north side as there is no pavement on the south side for the existing houses. As for Site 321, pedestrian access to the centre of the village from the Public Footpath at the lower/northern edge of Site 321 is not safe for children due to the blind narrow crossing at Court Lane, the steepness of the hill, the narrowness of the road, the number of parked cars, and the quantity and speed of local and through-commuting traffic in particular at rush hours/school times. These draw backs and safety hazzards for Site 321 are not weighed up in the same way as for pedestrians crossing the

B3098 from site 738, rather it is recorded for Site 321: "there is an opportunity to link with the adjoining Public Rights of Way...." and there is no mention of issues with Court Lane (page 61 Accessibility site 321).

**7. Unsoundness of the selection between the sites or either site:**

**The steps for the selection of preferred sites and developing plan proposals** are set out on page 21 of **Topic Paper 2**, Site Selection Process Methodology July 2018 Submission Version. Stage 4A Selection of Preferred sites on pages 21 and 22. Stage 4B: Testing Plan Proposals is on page 22. And also on pages 33 and 34. **In the Westbury Community Area Topic Paper** this is set out in Appendix G, pages 58 to 68.

Both Site 321 and 738 pass through the Steps of Stage 4A. As set out above the flawed weighing up of points and scores as set out in the Summary for Site 321 mean that (page 63) for **Step 4** of the Process it is stated (this is not accepted), "the overall sustainability benefits of developing the site (321) are considered **good**". It states that the estate would deliver " a proportionate number of dwellings within the context of a large village setting". It does not attempt to deal with the conflict with WCS for "small housing" or "fewer than 10 dwellings" or the needs of the village for employment opportunities. all is unsound deliberation and draws an incorrect conclusion. This was all contained in the papers for the Consultation last year **but has to be repeated here because of the re introduction of Site 738.**

For Site 738 at **Step 4** (page 67) the Summary sets out that the Site "could deliver a **moderate** but nonetheless acceptable and justified level of growth when considered within the the context of the indicative housing requirements of the Community Area Remainder. Development.....However the overall sustainability benefits of developing the site would be marginal due to a lack of certainty that comprehensive and attractive routes for pedestrians and cyclists are deliverable". The above is new. It is unsound. Reasons:

- The level of growth conflicts with the WCS.

- It fails to deal with the conflict of development at Large Villages being "small housing"... " fewer that 10".

- As for the reliance on the argument that it is acceptable and justified in the context of the Wesbury C.A.Remainder this is flawed because: firstly the allocation of housing is done in WHSAP in Housing Areas and this is the area for Westbury Community Area and the allocation of housing and the statistics (quoted above) show that the numbers have been exceeded so that further provision is not needed in Westbury Town nor in the Wesbury Community Area Remainder. (The successful Market Lavington argument that further housing should not automatically follow should be applied).

- the weighing up of the pedestrian and cyclist routes are not weighed up in a sound manner and they are not weighed up correct between the two Sites and the same points are not weighed up for Site 321 in the same manner or at all.

Secondly, that in the Westbury Community Area there is only one other Large Village - this is Dilton Marsh with a higher population than Bratton, closer to main roads such as A36 linking to larger communities such as Bath and Bristol for commuting and with a train station linking to Westbury and the south coast, ports of Southampton and Portsmouth, Swindon and Melksham, Bath, Bristol and the Midlands, but rejected from the WHSAP for even one small allocation as its primary school is full at present. The WHSAP doc has resulted in a plan where once one village is rejected the other must take all housing no matter how great the number and no matter what the scores and evaluations produce and even where contrary to the WCS policy for developments in Large Villages. The process is self evidently unsound. This is repeated here because this applies to the reintroduced Site 738 as much as for Site 321.

### **Moving on to Step 5.**

**The extract below is from pages 21-22 of Topic Paper 2:**

"6.8 Step 5 considered all the sites in each Area of Search together and resulted in the selection and rejection of sites. All sites that have satisfied Steps 1-3 were taken forward. This step compared the total dwellings that are provided by the pool of sites to indicative residual requirements. Where necessary, it selects and justifies site options that need to be rejected because the overall scales of development exceed that proposed by each area strategy and [Page 21] growth would not result in sustainable development. ***For example, if several site options at a large village suggest too much development, in excess of local needs, then a site may need to be rejected.(emphasis added).***

"6.9 The result of this five step assessment were a set of draft allocations in the form of detailed site boundaries and an approximate dwelling capacity. Each Community Area Paper also identifies particular considerations connected to a given site that should be referred to by the Plan.

"6.10 Assessments are recorded in each Community Area Paper and they use a common template of guidance (included in this paper in appendix two) and evidence sources." [end of extract].

**I repeat the critical wording: "For example, if several site options at a large village suggest too much development, in excess of local needs, then a site may need to be rejected." This argument applies regardless as to whether there is one, two, three or more sites. Where one site delivers housing in excess of local needs then that one site must also be rejected. If there were say 5 small sites of say 7 houses by way of example and the village had a need for this, then all could go through the process. The critical points are whether**

**- (a) the development fits in with the WCS for "small housing" for Large Villages. This applies regardless of whether there is a single development or multi sites. and**

**- (b) whether they exceed the local needs, that is the needs of Bratton.**

***The answer to (a) has been set out and the answer is "No".***

***The further reasoning under point (b) is as follows. This applies to the new Site 738. It also applies to Site 321.***

***A new Housing Survey has been carried out by Wiltshire Council at the request of the Parish and results just received and the Summary is extracted and set out below.*** 552 Questionnaires were sent out. 197 responses were received back.

[Extract] "Summary

This survey's recommendations (see Section 8 below) concentrate on those households who are unable to afford accommodation on the open market.

This is just a quarter of the research needed for this assessment: the Housing Register of Wiltshire Council, the local Strategic Housing Market Assessment and the advice from allocation staff who manage the Register must also be taken into account.

In October 2018, there were four households on the Wiltshire Council Housing Register seeking affordable accommodation in Bratton parish seeking accommodation between one and four bedrooms, and any full assessment of housing need in the parish must take account of the Register.<sup>[1]</sup>

- The 2011 Census recorded fifty two social homes in the parish.<sup>[2]</sup> These properties represent 10.2% of the total housing in Bratton, which is lower than the Wiltshire affordable housing average of 14.7%.<sup>[3]</sup>
- The social housing in Bratton had a high re-let rate of 21.2% in the past year. From the third quarter of 2017 to the third quarter 2018 eleven social home were re-let in the parish.<sup>[4]</sup>

• This re-let rate suggests that two of the households responding to section two of this survey and in need of affordable accommodation could meet its needs through accessing the existing social housing of the parish."<sup>[end of extract]</sup>.

**In conclusion it states that 4 households have responded and state they require social housing.**

This is **lower** than the figures already set out in the Westbury Community Area Topic Paper on pages 27 (Site 321) and pages 66-67 (Site 738). The figures from the 2013 Rural Housing Needs Survey show a need at that time for Subsidised rented accommodation of 5 units , and 3 for low cost home ownership/shared ownership. This is number which can be considered in the Neighbourhood Planning process by the village, the Parish Council and the Steering Group of the neighbourhood plan. The OM007 site is recorded in the Proposed Changes as having an area for 15 houses. It is unlikely that the development of private land at Sites 321 or 738 will result in long term affordable secure tenancy rented homes more akin to that provided by Housing Associations, or that the owned ones will be shared ownership shared with a freehold owner such as a

Housing Association. Affordable Housing to to rent and to buy may be at reduced rates but will be available to all in the region, not just to those in need in the Village.

The Housing Survey of October 2018 shows that the development at Site 321 and Site 738 **exceed** the needs of the village. Therefore it follows under the WCS process at Step 4 that both sites should be rejected.

The answer to point b) above is also:No.

However at Stage 5 (page 67 of the Westbury Area Topic Paper), both sites are taken forward and one is rejected as "the combined pool of both site options in this area would deliver substantially more than the indicative 47 dwellings [note: **now reduced to 44** in up to date statistics]required over the remainder of the plan period and would not represent modest growth envisaged by WCS in Core Policy 1". On page 68 it is stated that Site 738 "has **several** constraints which make the site less sustainable in comparison to Site (321),....." but if several means three it does not set outthe additional constraints. Again for Site 738 it refers to "....developing the site would be marginal due to the lack of certainty that comprehensive and attractive routes for pedestrians and cyclists are deliverable". There is no mention previously to the need for "attractive" routes in the weighing up of the site or for comparison with site 321.- there is no justification for this. There is no reference to the need for safe routes at all and the fact that both sites have safety issues with this, either for 738 or 321.

In the final paragraph ( whole paragraph is a Proposed Change and newly added wording): (for Site 321, last sentence) "However, in overall terms, the evidence gathered to date indicates that all adverse impacts can be appropriately mitigated". Site 321 therefore is preferred - see table G.6. It is preferred for "40 dwellings" - [Note:now reduced to 35 in Proposed Changes]. As such the whole selection process is flawed. Correctly carried out in accordance to the WCS would result in both Sites being rejected at an earlier stage.

Development can be progressed in Bratton, but through the neighbourhood planning process. See below at 8. and above at 5.

#### **8. The need to provide development through Neighbourhood Plans. Site Allocation contrary to WCS.**

It is a core aim of the WCS to provide for the Localism Act with development being considered in the local areas and communities. I repeat the paragraphs from the WHSAP Topic Paper 2 Site Selection Process Methodology July 2018 Submission Version. See in particular paragraph 3.8:

At pages 13-14:[start quote]

"3. Stage 1:Areas of Search

"Neighbourhood Planning

"3.5 Neighbourhood Plans are an important part of the planning system. The National Planning Policy Framework (NPPF) describes their role:

*"Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to:*

*"set planning policies through neighbourhood plans to determine decisions on planning applications..." (note 7)*

**"3.6 The Council supports passing direct powers over planning to local communities as a part of building up the resilience of local communities.**

"3.7 Referring to the role of Local Plans prepared by the Council the NPPF states:

*"Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:*

*"the homes and jobs needed in the area ..." (note 8)*

**"3.8 It is only necessary for this Plan to allocate land for housing development where it is a *strategic priority to do so*. WCS Core Policy 1 proposes that development at **Large Villages should be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Unless there is a strategic priority to deliver the homes needed in an HMA, then the most appropriate means to assess local needs and plan growth at each Large Village is through the neighbourhood planning process.**" [End of quote].(emphasis added).**

The WCS strategy does not extend to housing sites in Large Villages. There is concern that neighbourhood Plans may not deliver sufficient housing in a Large Village for a Community Area but this is not the case in Westbury Community Area. As set out a 1. above, the housing numbers are in excess of the numbers required. In addition on the statistics there is sufficient for the 5% buffer also required over the period. In keeping with the WCS the way to proceed therefore is not by allocating one, other or two sites at Bratton, but to proceed via the Neighbourhood Plan.

## **9. Conclusion:**

The objections show that the process and basis of allowing both sites 321 and 738 through to Steps 4 and 5 of Stage 4 are flawed and unsound, and the basis for selecting Site 321 over 738 is unsound. Both sites should be rejected. Wesbury Community Area has satisfied the amount of housing it must provide. Bratton is able to proceed with measured development through the current planning laws and the neighbourhood Planning process to provide housing which is actually in accordance with the village needs, is not fundamentally in breach of the WCS Core Strategy and is of a size, type and tenure suitable for the village needs.



<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	326	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187755	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	327	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187759	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. I object to developments 138 and 321 in full.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	328	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
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<b>Comment ID:</b>	329	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187758	Atlas Planning Group  <b>Person ID:</b> 1187754	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				
<b>Please give details of why you support or do not support the updates to the</b>	Representations to the consultation on the Schedule of Proposed Changes to the Wiltshire Housing Site Allocations Plan.				

**associated evidence documents.**

Regarding: Proposed Changes PC13 & PC94.

We are today submitting representations on behalf of our client, [REDACTED] in relation to the proposed changes to the Emerging Wiltshire Housing Site Allocations Plan. [REDACTED] is the landowner of SHLAA site 738, referred to as 'Land south of Westbury Road' within the Wiltshire Housing Site Allocations Plan and supporting documentation.

Site 738 was originally rejected from the site selection process at stage 2, but following the presubmission consultation in the summer of 2017 the site was re-assessed and within the July 2018 submission version of the plan was found to be a 'more sustainable' site. However, the site was rejected at stage 4a of the site selection process as the LPA considered that the combined pool of the two potential allocation sites (321 and 738) within the Westbury Community Area would result in an oversupply of housing for the Community Area remainder.

In light of the proposed alterations to the Wiltshire Housing Site Allocations Plan which reduce the allocation capacity of site 321 ('Land off B3098 adjacent to Court Orchard/ Cassways'), we submit that the allocation of site 738 should be reconsidered so that the requirement for housing within the Westbury Community Area remainder can be met in full.

PC13 & PC94

Both of these changes reduce the number of approximate dwellings anticipated to be delivered at site 321, from 40 to 35.

The housing requirement for the Westbury Community Area remainder for the period 2006-2026, as shown in table 2.3 of the Submission Version of the Westbury Community Area Topic Paper is 44 dwellings.

Based on the revised number of 35 dwellings allocated at site 321, the allocation of only the 'Land off B3098 adjacent to Court Orchard/ Cassways' site would lead to the provision of only c.79.5% of the stated housing requirement for the Westbury Community Area remainder.

However, the actual level of provision may be even less, as Table 6.6 of the Westbury Community Area Topic Paper states that site 321 has a SHLAA capacity of 32 dwellings. Based on this figure, the allocation of only site 321 would result in the provision of only c.72.7% of the housing requirement.

[TABLE INSERT]

Paragraph 35 of the National Planning Policy Framework (as revised) states:

"Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.”

By failing to take the opportunity to meet the identified housing need within the Westbury Community Area remainder, the Plan cannot be considered to be positively prepared, justified, or consistent with national policy.

NPPF 35(a) is extremely clear – a LPA’s spatial strategy should as a minimum seek to meet the objectively assessed needs of an area. In this case, the need for housing in the Westbury Community Area remainder over the rest of the plan period is 44 dwellings. The allocation of any less than both sites 321 and 738 would therefore result in an under-delivery of housing in direct contrast to the guidance contained within the NPPF.

In the same vein, the Wiltshire Housing Site Allocations Plan currently ignores the reasonable alternative of allocating site 738, which has been identified within the site selection process as a ‘more sustainable’ site. Taking NPPF 35(b) into account, this approach is not justified.

The decision to not allocate site 738 within the Plan is also inconsistent with national policy, contained within the NPPF. Paragraph 59 clearly states the Government’s intention through the planning system is to significantly boost the supply of housing, and the development of site 738 would make a modest contribution to this objective.

NPPF 77 states:

“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.”

The Plan’s currently proposed approach would not respond to the identified local need for the Westbury Community Area remainder and as such, would be contrary to NPPF 77.

Most importantly, allocating only site 321 would be contrary to the presumption in favour of sustainable development, which NPPF 10 states is “at the heart of the framework”. NPPF 11 details this presumption and specifically states in relation to plan-making:

“For plan-making this means that:

- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

A development need of 44 dwellings for the Westbury Community Area remainder has been identified, which cannot be met solely through the allocation of site 321. The additional allocation of site 738 would help fully realise the need for housing in the Westbury Community Area remainder and provide an additional buffer, which would allow for future flexibility should a sudden increase in demand or decrease in supply occur.

Again, NPPF 11 reiterates that strategic policies should provide for the objectively assessed housing needs of an area as a minimum. There are no policies within the Framework which specifically protect any areas or assets of value relevant to site 738 and the land has been assessed as being ‘more sustainable’, so its development would not result in adverse impacts which could be capable of significantly and demonstrably outweighing the benefits of delivering a housing scheme on the site. Therefore, the presumption in favour of sustainable development clearly weighs in favour of the allocation of site 738 within the Wiltshire Housing Site Allocations Plan.

On the basis of the above, the decision only to allocate site 321 in the Westbury Community Area remainder is inconsistent with national policy contained within the NPPF (Paragraphs 11, 59 & 77) and is therefore contrary to NPPF 35(d).

#### Concluding Remarks

Site 738 was the only other site within the Westbury Community Area remainder to be identified as a suitable site for allocation within the Wiltshire Housing Site Allocations Plan and represents an obvious opportunity to secure the delivery of a suitable supply of future housing stock in a sustainable location. The site would provide approximately 20 dwellings for the Westbury Community Area remainder, which when added to

	<p>the anticipated supply of either 32 or 35 dwellings at site 321 would mean that the required 44 dwellings could be provided (c.118.2% or 125.0% fulfilment of requirement).</p> <p>Even the higher level of supply is not considered to be so great that it would represent an adverse over-delivery of housing and in light of the Government's clear intention to significantly boost the supply of housing, achieving this level of supply is a sustainable, realistic and positive ambition.</p> <p>I trust this representation will be given due consideration, however should you wish to discuss any element further please do not hesitate to contact me.</p>		
<b>Supporting documents (Please see Objective)</b>	5135143		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	330	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC25				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Representations on the Focussed Consultation on Schedule of Proposed Changes and Associated Evidence Documents for the Wiltshire Housing Site Allocations Plan Land at Victoria Drive, Lyneham Pegasus Group are instructed by Barratt Homes (Bristol) Ltd to submit representations in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan (HSAP). The Council submitted the draft Wiltshire HSAP along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. This was followed by a procedural letter from the inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). Barratt Homes has a land interest in Lyneham at the site referred to within these representations as Land at Victoria Drive. To summarise, the Council are continuing to over-estimate the delivery rates at large strategic sites in the district and are failing to allocate a sufficient number of sites to account for the inevitable shortfall that will result. The Council, therefore, need to allocate sites that are likely to deliver dwellings by the end of the current plan period. Land at Victoria Drive, Lyneham is one such location that could sustainably accommodate development that would contribute to meeting the housing needs of Wiltshire over the remaining years of the plan period. Implications for Lyneham The proposed changes to the HSAP have little to no impact on Lyneham or the Royal Wootton Bassett (RWB) and Cricklade Community Area. The Council have decided that there is no need to identify additional sites for development in the RWB and Cricklade Community Area as it has effectively met its housing requirement under the Core Strategy. This position is supported by the RWB and Cricklade Community Area Topic Paper which confirms that of the 1,455 dwellings required to be delivered under the current plan period, a total of 1,319 have been delivered. Of the remaining 136 dwellings, there are current planning permissions to deliver 317 dwellings. As such, Barratt Homes consider it likely that the RWB and Cricklade Community Area will at least meet its housing target over the remaining years of the plan period. As a result of the above, the proposed changes to the HSAP do not alter this position. Issues with the HSAP However, there remain a number of fundamental issues with the plan. Specifically, there is a substantial over-reliance on strategic sites to deliver homes over the remaining years of the plan period which means that it will fail to deliver the requisite quantum of housing to secure the Councils five-year housing land supply position. The delivery of housing on a number of strategic sites across the Councils Housing Market Areas has failed to come forward at a rate that was expected when they were first allocated under the Core</p>				



Strategy. Sites around Chippenham, Salisbury (Churchfields) and Trowbridge (Ashton Park) have suffered significant delays and are expected to deliver significantly fewer dwellings over the remaining years of the plan period than was previously anticipated when the Core Strategy was adopted. Furthermore, the Council continue to be overly optimistic in their assumed delivery trajectories at a number of these strategic sites across the district. Indeed, there is a very realistic prospect that the delivery at these sites will be significantly below what is predicted by the HSAP, based on research into lead in times and build out rates for large strategic sites. For example, the Council are expecting to deliver 1,350 dwellings at Ashton Park (PC25 and 26), a strategic allocation to the south of Trowbridge. The Council are expecting the site to deliver 1,350 dwellings over the remaining years of the plan period (with 1,250 to follow beyond the end of the plan period), despite the fact that outline consent has not been granted yet and the site is reliant on the delivery of a new bypass to allow the majority of housing to come forward. However, even assuming permission was granted immediately, it is still expected that it would take a minimum of five years before the first completions came forward on the site. In that case there would only be 2/3 years left of the plan period to deliver 1,350 dwellings. This would equate to c. 675/450 dwellings per year. Based on research into build-out rates on large scale sites, this is clearly overly optimistic. For example, Research by Lichfields suggests that build out rates on sites for 2,000+ dwellings average around 161 dwellings per year. The highest build out rate they assessed was 321 dwellings per annum and even this is significantly below what the Council appear to be predicting. There is, therefore, a very real prospect that the sites allocated under the HSAP will not deliver the predicted quantum of housing and, as such, the Council will fail to secure its five-year housing land supply position for the remaining years of the plan period. Given that securing the Councils five-year land supply position is one of its key aims, this is a fundamental flaw with the plan. Land at Victoria Park, Lyneham Lyneham is defined as a Larger Village by the Core Strategy. Development at the Larger Villages is restricted to small scale infill development and redevelopment within its settlement boundary. As such, Lyneham has not taken on any growth over the current plan period, save for some small-scale development/redevelopment in line with this approach. The Council have not been averse to allocating sites at the Larger Villages where there is a clear strategic/local need to do so. Given the identified flaws of the HSAP, there is a clear need to allocate further sites for development that will be deliverable over the remaining years of the plan period. Barratt Homes would not object to this being done based on the current hierarchical approach set out within the Core Strategy, but development at the Larger Villages should be considered. Furthermore, the approach to development in the RWB and Cricklade Community Area should also be altered to allow for further development. The target requirement set out in the Core Strategy for each community area should be regarded as a minimum figure. Exceeding this figure should not automatically preclude further development within a specific area, especially when it can accommodate development sustainably, whilst helping to meet the strategic housing targets of the district as a whole. In terms of an identified local need, the Parish Council prepared a housing needs survey which identified a need for around 28 affordable dwellings. The survey also identified that only 10.8% of properties in the parish were affordable, compared with a district wide average of 19.2%. As the Core Strategy's policy towards Larger Villages effectively precludes large scale development unless sites are specifically allocated within the development plan, this affordable housing need remains unmet by the small-scale development that has taken place which has largely been exempt from delivering affordable homes. Lyneham is a fundamentally sustainable location for development given that it benefits from a number of services and facilities, good public transport links, with relatively frequent services to Chippenham and Swindon throughout most of the day. Lyneham's biggest asset is MOD base (MOD Lyneham) within the village. The base acts as a key employer with close ties to the village. It is understood that the base is home to c. 1,500 students and provides up to 620 jobs. Furthermore, it is likely that further army training facilities are to be provided at the site. Barratt propose matching housing delivery with employment delivery at this settlement, which although it has less facilities than Wotton Bassett, it nevertheless has a good range of local services. The development of the site would result in a modest amount of growth at Lyneham and provide benefits in the form of affordable housing and open space. Barratt Homes would also be able to provide additional employment space alongside new residential development to further enhance the self-containment of the village. However, most importantly, the site would be deliverable within the plan period and,

	therefore, be able to make a positive contribution to securing the Councils Housing Land Supply position over the remaining years of the plan period.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	I did not submit any comments on the previous stage		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	331	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC26				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Representations on the Focussed Consultation on Schedule of Proposed Changes and Associated Evidence Documents for the Wiltshire Housing Site Allocations Plan Land at Victoria Drive, Lyneham Pegasus Group are instructed by Barratt Homes (Bristol) Ltd to submit representations in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan (HSAP). The Council submitted the draft Wiltshire HSAP along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. This was followed by a procedural letter from the inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). Barratt Homes has a land interest in Lyneham at the site referred to within these representations as Land at Victoria Drive. To summarise, the Council are continuing to over-estimate the delivery rates at large strategic sites in the district and are failing to allocate a sufficient number of sites to account for the inevitable shortfall that will result. The Council, therefore, need to allocate sites that are likely to deliver dwellings by the end of the current plan period. Land at Victoria Drive, Lyneham is one such location that could sustainably accommodate development that would contribute to meeting the housing needs of Wiltshire over the remaining years of the plan period. Implications for Lyneham The proposed changes to the HSAP have little to no impact on Lyneham or the Royal Wootton Bassett (RWB) and Cricklade Community Area. The Council have decided that there is no need to identify additional sites for development in the RWB and Cricklade Community Area as it has effectively met its housing requirement under the Core Strategy. This position is supported by the RWB and Cricklade Community Area Topic Paper which confirms that of the 1,455 dwellings required to be delivered under the current plan period, a total of 1,319 have been delivered. Of the remaining 136 dwellings, there are current planning permissions to deliver 317 dwellings. As such, Barratt Homes consider it likely that the RWB and Cricklade Community Area will at least meet its housing target over the remaining years of the plan period. As a result of the above, the proposed changes to the HSAP do not alter this position. Issues with the HSAP However, there remain a number of fundamental issues with the plan. Specifically, there is a substantial over-reliance on strategic sites to deliver homes over the remaining years of the plan period which means that it will fail to deliver the requisite quantum of housing to secure the Councils five-year housing land supply position. The delivery of housing on a number of strategic sites across the Councils Housing Market Areas has failed to come forward at a rate that was expected when they were first allocated under the Core</p>			

Strategy. Sites around Chippenham, Salisbury (Churchfields) and Trowbridge (Ashton Park) have suffered significant delays and are expected to deliver significantly fewer dwellings over the remaining years of the plan period than was previously anticipated when the Core Strategy was adopted. Furthermore, the Council continue to be overly optimistic in their assumed delivery trajectories at a number of these strategic sites across the district. Indeed, there is a very realistic prospect that the delivery at these sites will be significantly below what is predicted by the HSAP, based on research into lead in times and build out rates for large strategic sites. For example, the Council are expecting to deliver 1,350 dwellings at Ashton Park (PC25 and 26), a strategic allocation to the south of Trowbridge. The Council are expecting the site to deliver 1,350 dwellings over the remaining years of the plan period (with 1,250 to follow beyond the end of the plan period), despite the fact that outline consent has not been granted yet and the site is reliant on the delivery of a new bypass to allow the majority of housing to come forward. However, even assuming permission was granted immediately, it is still expected that it would take a minimum of five years before the first completions came forward on the site. In that case there would only be 2/3 years left of the plan period to deliver 1,350 dwellings. This would equate to c. 675/450 dwellings per year. Based on research into build-out rates on large scale sites, this is clearly overly optimistic. For example, Research by Lichfields suggests that build out rates on sites for 2,000+ dwellings average around 161 dwellings per year. The highest build out rate they assessed was 321 dwellings per annum and even this is significantly below what the Council appear to be predicting. There is, therefore, a very real prospect that the sites allocated under the HSAP will not deliver the predicted quantum of housing and, as such, the Council will fail to secure its five-year housing land supply position for the remaining years of the plan period. Given that securing the Councils five-year land supply position is one of its key aims, this is a fundamental flaw with the plan. Land at Victoria Park, Lyneham Lyneham is defined as a Larger Village by the Core Strategy. Development at the Larger Villages is restricted to small scale infill development and redevelopment within its settlement boundary. As such, Lyneham has not taken on any growth over the current plan period, save for some small-scale development/redevelopment in line with this approach. 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In terms of an identified local need, the Parish Council prepared a housing needs survey which identified a need for around 28 affordable dwellings. The survey also identified that only 10.8% of properties in the parish were affordable, compared with a district wide average of 19.2%. As the Core Strategy's policy towards Larger Villages effectively precludes large scale development unless sites are specifically allocated within the development plan, this affordable housing need remains unmet by the small-scale development that has taken place which has largely been exempt from delivering affordable homes. Lyneham is a fundamentally sustainable location for development given that it benefits from a number of services and facilities, good public transport links, with relatively frequent services to Chippenham and Swindon throughout most of the day. Lyneham's biggest asset is MOD base (MOD Lyneham) within the village. The base acts as a key employer with close ties to the village. It is understood that the base is home to c. 1,500 students and provides up to 620 jobs. Furthermore, it is likely that further army training facilities are to be provided at the site. Barratt propose matching housing delivery with employment delivery at this settlement, which although it has less facilities than Wotton Bassett, it nevertheless has a good range of local services. The development of the site would result in a modest amount of growth at Lyneham and provide benefits in the form of affordable housing and open space. Barratt Homes would also be able to provide additional employment space alongside new residential development to further enhance the self-containment of the village. However, most importantly, the site would be deliverable within the plan period and,

	therefore, be able to make a positive contribution to securing the Councils Housing Land Supply position over the remaining years of the plan period.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	I did not submit any comments on the previous stage		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	332	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 840630	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC64				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>The increased number of houses proposed for the western side of the Hilperton Gap (up from 205 to 355) is not justifiable. The increase in area (16.33ha to 21.24ha) does not justify the increase in numbers especially when much of the 'new' land comprises balancing ponds for Elizabeth Way. The suggested increase in housing numbers is contrary to Policy 1 of the Hilperton Neighbourhood Development Plan 'made' by Wiltshire Council on the 5th November 2018. In particular it would not be possible to comply with policies 1f and 1g if the increased density went ahead. In addition, the original number (212) was set by Wiltshire Council and their June 2017 document stated 'although mitigation measures could reduce this number'. How WC can now feel that 355 houses can be accommodated with mitigation measures is a mystery. WC concedes that approx. 3/4 of site 263 'appears to be grade 3a agricultural land'. Grade 3a should be protected from, not sought out for, housing. Allocation H2.3 was flawed and ill conceived from the very beginning. For WC to choose to ignore their own mitigation measures is bizarre. Some of these mitigation requirements are shown below. 5.59 Mature and semi-mature hedgerows and trees are key features in the landscape and provide habitat for protected and non-protected species. The existing natural features of the site are significant in the landscape and would be incorporated within the detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, dark corridors for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species. 5.60 This site may be used by Bechsteins bats associated with the Bradford and Bath Bats SAC. Potentially sensitive habitat features on / adjacent to the site include: mature trees; hedgerows; and stream (minor watercourse) at the northern end of the site 5.61 These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (&lt;1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechsteins bats. 5.62 Development will also be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy through a financial contribution or direct provision of equivalent new infrastructure over and above normal Council requirements to deliver new habitat and recreational opportunities in line with criteria in the Strategy. 5.63 An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road. Consideration of drainage patterns and flood risk from all sources would need to inform any subsequent layout. In addition, surface water attenuation measures and improvements to existing on-site water infrastructure would need to be provided to support a comprehensive development of the site. 5.64 The layout and design of the site would need to give great weight to the significance of nearby heritage assets and</p>			

	their setting. Where necessary, stand-offs to existing development in Victoria Road, Albert Road and Wyke Road, along with the incorporation of appropriate boundary treatment would need to be considered through detailed layout and design.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	333	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187760	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. I agree with all the above! There is a lot of housing development in the Bratton/Westbury area already. As a health care professional it causes me great concern that the health care infrastructure is not strong enough to support the ongoing and proposed expansion of the housing market in Bratton/Westbury.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	334	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187761	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. All of the points raised by our Parish Council are valid and relevant to the well being and safety of our village and its residents. For us, the major issues are the number of houses proposed on the particular sites and the safety issues on the roads. The sites proposed are on the narrowest part of the road into the village from Westbury, on a slight bend and visibility, particularly on site 738, is hindered due to houses to left, right. This road is also used as a "rat run" for traffic to Erlestoke Prison and into Devizes and is busy with speeding traffic all day, but particularly mornings and evenings - presenting a certain danger to everyone using the road. The vehicles from new housing will only add to these dangerous conditions.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			

<b>proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	335	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187762	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>I support the decision regarding the Wiltshire Housing Site Allocation Plan at PC92 in relation to Site H2.13 at Ridgeway Farm, Crudwell where it says the site should be removed from the list to reflect the resolution of Wiltshire Council Cabinet, not be included in the WHSAP list and to wait for the Crudwell Neighbourhood Plan. I have been involved in the drafting of Crudwell Neighbourhood Plan now nearing completion and feel that should be waited for to see the wishes of the people of Crudwell before any further decision is taken about site size or allocation in Crudwell parish. There is universal opinion locally that Crudwell's infrastructure, sewers for instance, are already overstretched with soil water flowing onto public roads and into the main river on rainy days. Despite repeated complaints to Wessex Water they provide only platitudes but no action - because their pipe leading out of Crudwell, although renewed only about a decade ago, was and is of insufficient capacity to take the sewerage flows it should, and nobody seems to have the will or the ability to force Wessex Water to rectify this. Roads are tiny in width. Tuners Lane and Tetbury Lane (where the Ridgeway Farm site exits) are so small that a tractor fills them and they are regularly used by cars, tractors and lorries that hazard children walking to school, or walking to the playground on Tetbury Lane. There is no employment in the village so there is little point in adding houses there since the people must travel by already-busy roads to work. If any houses are added they should be in accordance with the needs and wishes of the village as observed by those who live there. Those needs will be detailed in the Crudwell Neighbourhood Plan. Please wait for it to be published and follow it's guidance.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	336	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC13				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				



assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

### 3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

#### Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

#### APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

	<p>Sustainability Appraisal coupled with the lack of commentary on the decision not to allocate for the full housing needs at Trowbridge, means that the HSAP will not meet the needs of Wiltshire nor deliver a sound and objectively assessed plan. Land at Maxcroft Farm 4.6 The credentials of land at Maxcroft Farm were presented to the Council in a Technical Delivery Document as part of the representations on the Regulation 19 version of the HSAP. This document covered: the sustainability of the location; the environmental factors affecting the location; the realistic housing potential/capacity of the area in relation to the environmental effects of development; and the deliverability of the location. 4.7 This was also supported by detailed technical notes supporting this representation in order to address identified concerns from internal consultees at Wiltshire. 4.8 In terms of delivery, Barratt Homes are keen to stress that the delivery of this site is immediate and could be delivered from start on site (following allocation/consent) to practical completion within 24 months. 4.9 Given the issues with delivery in Wiltshire and the strategic settlements this must be considered a significant benefit of the site to realistically deliver well within the remaining plan period before 2026. As set out in the next section it is not thought that the allocations as they stand will achieve this aim. 5. CONCLUSION 5.1 These representations have been prepared by Pegasus Group on behalf of Barratt Homes (Bristol) in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan (HSAP). 5.2 These representations are specifically concerned with the strategy set out within the HSAP delivering new homes at Trowbridge. The key proposed changes identify additional dwellings to be delivered at the already proposed sites, but do not identify additional sites. 5.3 Under the HSAP, Trowbridge is projected to fall short of its Core Strategy housing target by a minimum of 1,297 dwellings. Barratt Homes feel that this figure will be significantly higher due to the Councils overly optimistic assumptions regarding delivery rates at the proposed allocations namely Ashton Park. 5.4 The Council are justifying this shortfall by saying that it will be met during the following plan period (i.e. 2016-2036). However, aside from being bad planning, this approach will further exacerbate pressure on other parts of the district to deliver the housing required under the current plan period (2006-2026), whilst also failing to deliver (among other things) the housing required to support the economic growth of Trowbridge. Ultimately, the strategy will delay the allocation of additional sites to a new local plan when they should be allocated under the HSAP. 5.5 The HSAP must, therefore, be found unsound as it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives of the Core Strategy and is inconsistent with national policy. 5.6 In order to be found sound, Barratt Homes believe it is imperative that additional sites are identified within the HSAP due to the pressing need to deliver homes at Trowbridge over the remaining years of the current plan period. 5.7 Given the sustainable performance and policy compliance of Maxcroft Farm in relation to the strategic priorities set out in the WCS, this is one such location that should be included.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	337	<b>Consultee</b> Clerk Hilperton Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 547867		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC64				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The increase in house numbers is contrary to the Hilperton Neighbourhood Development Plan which was made by Wiltshire Council four days ago. Policy 1f requires biodiversity protection, and landscaping and green infrastructure. Policy 1g requires any development to be well set back from Elizabeth Way whilst landscaping should conceal any development from Hilperton and the eastern side of the road. Neither of these policies can be implemented with the proposed new density of houses. The increased number of houses proposed for the west side of the Hilperton Gap (from 205 to 355) is not justifiable. The increase in area (16.33ha to 21.24ha) does not justify this increase especially when much of the 'new' land are the balancing ponds for Elizabeth Way. In addition, the original number for this site (212) was set by Wiltshire Council and their June 2017 document stated 'although mitigation measures could reduce this number'. How WC can now feel that 355 houses can be accommodated with mitigation measures is a mystery. 'Reduction' surely means a lower number, not an increase? WC concedes that approx. 3/4 of site 263 'appears to be grade 3a agricultural land' and so should be protected from development.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	338	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187768	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	339	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1135814	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the removal of Site 3233 Ridgeway Farm from the Malmesbury Community Area Reminder. Having read the submissions and participated in the consultation regarding the Crudwell Neighbourhood Plan I am pleased that the issues raised by the local community have been largely recognized. There is no current or near term need for a development of this size within the Village of Crudwell. I am not opposed to developments of an appropriate scale and the emerging Neighbourhood Plan is identifying land that is consistent with the Wilshire Core Strategy of developments in large villages being limited to small sites. (This was why I had no objection to the original development of the 10 permitted residences that is now complete).				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	340	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187761	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	CATP/19				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. All of the points raised by our Parish Council are valid and relevant to the well being and safety of our village and its residents. For us, the major issues are the number of houses proposed on the particular sites and the safety issues on the roads. The sites proposed are on the narrowest part of the road into the village from Westbury, on a slight bend and visibility, particularly on site 738, is hindered due to houses to left, right. This road is also used as a "rat run" for traffic to Erlestoke Prison and into Devizes and is busy with speeding traffic all day, but particularly mornings and evenings - presenting a certain danger to everyone using the road. The vehicles from new housing will only add to these dangerous conditions.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			

<p><b>proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	341	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1133304	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I fully support the proposed change to remove the Ridgeway Development from the Housing Site Allocation Plan. I believe that the originally proposed allocation of 50 dwellings (ie an additional 40 dwellings) is quite unnecessary and contrary to the emerging Crudwell Neighbourhood Plan and to the wishes of the great majority of Crudwell residents. The recent Housing Needs Analysis conducted in Crudwell identifies a need for just 20 - 25 additional dwellings in Crudwell during the coming 10 year planning period; many of which will be satisfied by "windfall" planning applications. Further, it is understood that there is no strategic need for any additional housing needs in the Malmesbury Community Area, and hence the allocation of a further 40 dwellings to Crudwell is quite unnecessary and unjustified. The Ridgeway Development is poorly located, and will give rise to increased traffic and road safety issues in the narrow and already congested Tetbury Lane. The residents of Crudwell are well now advanced in the preparation of the Crudwell Neighbourhood Plan (having conducted several rounds of public consultation). That Neighbourhood Plan will confirm the housing needs of the village, and will identify preferred housing sites and infrastructure needs to support those sites. It would be premature and, I consider, undemocratic to impose the Ridgeway Development on Crudwell in advance of the finalisation of the Crudwell Neighbourhood Plan.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		



<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	342	<b>Consultee</b> Clerk to West Tisbury Parish Council West Tisbury Parish Council	<b>Agent</b>  <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>  1121411		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC42				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Proposals for revised settlement boundaries - proposed change SBR PC4 (8-E/F) Residents have brought to the attention of West Tisbury Parish Council their concerns at the proposed revised changes. Those who attended the parish council meeting will be corresponding direct: [REDACTED] [REDACTED] [REDACTED] [REDACTED] also sent their concerns (not present at meeting) Please could direct consultation take place with all the owners of adjoining land/properties to the said proposed area for change, including a site visit. Also, could Wiltshire Council please clarify the status of the various pieces of land and their usage within the revised proposed areas if change. We await to hear from you in the near future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	343	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187770	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. The proposal exceeds dramatically the housing needs required therefore a total waste to develop unneeded houses. Traffic at west end of the village and very difficult access onto main road. Very dangerous. Westbury has an excess of houses. Pressure on the surgery - already very pressurised.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

**Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.**

**Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.**

<b>Comment ID:</b>	344	<b>Consultee</b> White Horse Alliance	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 487991		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Update to Habitats Regulations Assessment Addendum (September 2018) (EXAM/03)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p>WHSAP: Consultation response from the White Horse Alliance, November 2018</p> <p>We wish to respond to the following documents. Wiltshire Housing Site Allocations Plan - Focussed consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan supported by the accompanying revised Sustainability Appraisal Report, updates to the Addendum to the Habitats Regulations Assessment and associated evidence documents</p>				

**Assessment Addendum  
(September 2018).**

We do not want to use the 'Representation forms' for the simple reason that the Habitats Regulations Assessment and 'Addendum' cannot demonstrate that the housing sites allocations plan if approved would not lead to a breach of the Habitats Regulations 2010 and Habitats Directive 1992.

We will comment on the HRA Addendum in relation to its assessment of likely significant effects on the Bath and Bradford-on-Avon SAC for Bats and the River Avon system SAC and question whether the Sustainability Appraisal performs any useful function in examining the sustainability of the plan.

**Bath and Bradford-on-Avon SAC for Bats**

If the Council's plans for mitigating the adverse impacts of the housing sites plan on the integrity of the Bath and Bradford-on-Avon Special Area of Conservation (SAC) for bats cannot show beyond reasonable scientific doubt that the proposed additional housing development in the Trowbridge area, in combination with previously permitted development including Ashton Park and its relief road, will not lead to a breach of Article 6(3) of the Habitats Directive then the legality and soundness of the Housing Sites Allocations Plan itself is in question.

You will see from the attached report by Professor John Altringham of Leeds University that he is not satisfied that significant adverse effects on the SAC can be ruled out.

**River Avon System SAC - HRA and SA**

The favourable conservation status of the Avon and its tributaries has been under threat since at least the 1990s when it became a cSAC. Optimism and wishful thinking have characterised action – or lack of it – by the bodies exercising delegated powers on behalf of the 'member state' – DoE/DETR/DEFRA; EN/NE'; EA; and local councils. Problems of over-abstraction, nutrient enrichment and silting have been identified and then massaged away by acceptance of long-term plans by the water companies for capital investment in reducing end-of-pipe discharges of phosphates and nitrates at treatment plants, notably Warminster and Petersfinger (Salisbury). A 'nutrient management plan' has made optimistic assumptions that management of pollution from agriculture will somehow create capacity for water companies to continue non-compliant discharges and developers to build housing estates without controlling phosphate discharges from the development itself

National England and the EA finally confessed to the failure of the 2015 nutrient management plan (NMP). Almost three years after the creation of the NMP, on 9 March 2018, the EA sent a joint statement to councils in the Avon System's catchment area admitting that control of agricultural sources had been less successful than expected, local treatment plants would not be able to control emissions within their current investment plans and local authorities would have to ensure that new developments were phosphate neutral

The email from the agencies is quoted in the HRA Addendum:

"Evidence suggests that the targets in the Hampshire Avon nutrient management plan are unlikely to be delivered by 2021. We are modelling what this means for the Nutrient Management Plan, and will be providing recommendations in March 2019.

We know that there will be new development and we advise that the new development within the catchment of the Hampshire Avon needs to be "phosphate neutral". We will work with you to help you demonstrate how that can be best achieved."



The HRA Addendum spells out the implications of the message from EA and NE:

“The aim of the NMP is to bring phosphate concentrations in the River Avon SAC down to the conservation targets set by Natural England in order to bring the river system into favourable condition as required by the Habitats Regulations.”

This appears to be a clear admission that the conservation status of the Avon SAC does not currently comply with the Habitats Directive/Regulations. The Member State is therefore in breach of its duty to maintain and enhance the conservation status of sites in the Natural 2000 network.

The joint statement from NE and EA says, in effect, that the phosphate burden on the Avon SAC cannot be controlled by agricultural management and the water companies are not going to invest in plant improvements soon enough to accommodate the extra phosphate discharges from new housing developments. The HRA Addendum explains the implications for councils controlling development in the Avon catchment:

Consequently the Council has been advised that in order to comply with the Habitats Regulations, it should demonstrate all development is “phosphate neutral” for an interim period until any necessary permanent reductions can be accommodated in the water company’s asset management plan

The HRA Addendum then goes on to reach a conclusion that somehow shifts the responsibility for action to bring the condition of the SAC into compliance with the Habitats Directive away from the one source of phosphates that it can control:

It is recognised that the conservation targets will only be met in the long term if measures are taken to reduce runoff from agricultural land and discharge concentrations from sewage treatment works. Both these measures are outside the control of local authorities.

Under ‘Implications for integrity test’, the Addendum sets out steps that could eventually reduce nutrient enrichment of the Avon to a point where the river system would be in a favourable conservation status.

The [Wiltshire] Council, Natural England, the EA, Wessex Water PLC, New Forest District Council, New Forest National Park Authority and Christchurch and East Dorset Council are making constructive progress, and developing a Memorandum of Understanding (MoU) which will be available to support submission of the Plan. It will describe how each local planning authority will ensure that development is ‘phosphate neutral’, and will define ‘phosphate neutral’.

Other mechanisms for improving the condition of the chalk stream system will include an improved nutrient management plan and, belatedly, adequate investment in treatment plants under the next ‘Water Industry Asset Management Plan (AMP) 2025-2030.’

So, even though there appears to be an ongoing breach of the Habitats Directive none of the parties involved in allowing this situation to develop are required to do anything especially urgent. Meanwhile the HRA Addendum is content to conclude that its housing sites plan is unlikely to have significant effects on the integrity of the Avon SAC.

Although other parties share responsibility for the poor state of the river system the HRA conclusion seems to rest entirely on Wiltshire and the other councils setting limits on phosphate emissions from new developments

As with the role of the TBMS in relation to the SAC for bats, we must await documents that may still be in draft when the examination of the WHSAP will be required to reach a conclusion on whether or not the plan can be judged - beyond reasonable scientific doubt - to be in compliance with European biodiversity law.

The Sustainability Appraisal by Atkins and WC will not help us answer that question. The timing of the statement the NE and EA issued on 9 March 2018 seems to have arrived too late to be considered in the SA (document created on 10 May).

At page 6 of the non-technical summary, the SA sets out the problems afflicting the river system in terms that will be familiar to anyone who has followed this saga over recent decades:

The River Avon SAC and ground water sources are particularly vulnerable to the effects of diffuse and point source pollution, in particular to elevated phosphate levels from additional sewage discharges in the catchment. This can be addressed through the introduction of a Nutrient Management Plan (NMP) to reduce phosphate levels

And:

Nitrogen enrichment of surface waters and groundwater is already regarded as [sic] problem in a number of areas. Wiltshire's chalk streams are internationally important for biodiversity, but currently suffer from a number of interacting factors that are having negative impacts.

Groundwater resources need to be protected and managed to ensure sustainable future supplies. There are two key risks to groundwater: pollution / contamination; and over use of groundwater.

What is to be done to ensure that the WHSAP addresses these problems? Will all housing developments in the river's catchment be required to be phosphate neutral? Are policy changes and plan modifications needed to ensure that this happens? The SA has no up-to-date recommendations to make. For example, dealing with Policy H2 North and West Wiltshire Housing Market Area, it says

#### Recommendations

'Whilst no LSE on the River Avon SAC and phosphate loading has been identified in the HRA, it is recommended that, when available, Annex 2 of the River Avon Special Area of Conservation Nutrient Management Plan for Phosphorus is reviewed for any additional mitigation measures that may be proposed.' It then quotes the Council response: 'Any implications arising from review of the Nutrient Management Plan will be addressed as Plan preparation progresses.'

In examining sustainability criteria for individual sites it does not highlight locations that will require control of phosphates at local level or recommend modifications to policies or plans.

It goes without saying that, as with other failures to meet sustainable development goals, such as those for car-dependency and carbon emissions, the SA concludes that while the plan could be improved it is, on balance, sustainable.

When serious scientific doubts hang over compliance with the Habitats Directive/Regulations in relation to the integrity of two of the three SACs that could be adversely impacted by the plan, we do not see how it can be judged 'sustainable' – or lawful, or sound.

	We ask you to ensure that these comments together with the attached report from [REDACTED] are brought to the attention of the Inspector.		
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5136459		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	345	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC25				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				

assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

### 3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

#### Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

#### APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

	<p>Sustainability Appraisal coupled with the lack of commentary on the decision not to allocate for the full housing needs at Trowbridge, means that the HSAP will not meet the needs of Wiltshire nor deliver a sound and objectively assessed plan. Land at Maxcroft Farm 4.6 The credentials of land at Maxcroft Farm were presented to the Council in a Technical Delivery Document as part of the representations on the Regulation 19 version of the HSAP. This document covered: the sustainability of the location; the environmental factors affecting the location; the realistic housing potential/capacity of the area in relation to the environmental effects of development; and the deliverability of the location. 4.7 This was also supported by detailed technical notes supporting this representation in order to address identified concerns from internal consultees at Wiltshire. 4.8 In terms of delivery, Barratt Homes are keen to stress that the delivery of this site is immediate and could be delivered from start on site (following allocation/consent) to practical completion within 24 months. 4.9 Given the issues with delivery in Wiltshire and the strategic settlements this must be considered a significant benefit of the site to realistically deliver well within the remaining plan period before 2026. As set out in the next section it is not thought that the allocations as they stand will achieve this aim. 5. CONCLUSION 5.1 These representations have been prepared by Pegasus Group on behalf of Barratt Homes (Bristol) in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan (HSAP). 5.2 These representations are specifically concerned with the strategy set out within the HSAP delivering new homes at Trowbridge. The key proposed changes identify additional dwellings to be delivered at the already proposed sites, but do not identify additional sites. 5.3 Under the HSAP, Trowbridge is projected to fall short of its Core Strategy housing target by a minimum of 1,297 dwellings. Barratt Homes feel that this figure will be significantly higher due to the Councils overly optimistic assumptions regarding delivery rates at the proposed allocations namely Ashton Park. 5.4 The Council are justifying this shortfall by saying that it will be met during the following plan period (i.e. 2016-2036). However, aside from being bad planning, this approach will further exacerbate pressure on other parts of the district to deliver the housing required under the current plan period (2006-2026), whilst also failing to deliver (among other things) the housing required to support the economic growth of Trowbridge. Ultimately, the strategy will delay the allocation of additional sites to a new local plan when they should be allocated under the HSAP. 5.5 The HSAP must, therefore, be found unsound as it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives of the Core Strategy and is inconsistent with national policy. 5.6 In order to be found sound, Barratt Homes believe it is imperative that additional sites are identified within the HSAP due to the pressing need to deliver homes at Trowbridge over the remaining years of the current plan period. 5.7 Given the sustainable performance and policy compliance of Maxcroft Farm in relation to the strategic priorities set out in the WCS, this is one such location that should be included.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	346	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC51				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				

assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

	<p>Sustainability Appraisal coupled with the lack of commentary on the decision not to allocate for the full housing needs at Trowbridge, means that the HSAP will not meet the needs of Wiltshire nor deliver a sound and objectively assessed plan. Land at Maxcroft Farm 4.6 The credentials of land at Maxcroft Farm were presented to the Council in a Technical Delivery Document as part of the representations on the Regulation 19 version of the HSAP. This document covered: the sustainability of the location; the environmental factors affecting the location; the realistic housing potential/capacity of the area in relation to the environmental effects of development; and the deliverability of the location. 4.7 This was also supported by detailed technical notes supporting this representation in order to address identified concerns from internal consultees at Wiltshire. 4.8 In terms of delivery, Barratt Homes are keen to stress that the delivery of this site is immediate and could be delivered from start on site (following allocation/consent) to practical completion within 24 months. 4.9 Given the issues with delivery in Wiltshire and the strategic settlements this must be considered a significant benefit of the site to realistically deliver well within the remaining plan period before 2026. As set out in the next section it is not thought that the allocations as they stand will achieve this aim. 5. CONCLUSION 5.1 These representations have been prepared by Pegasus Group on behalf of Barratt Homes (Bristol) in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan (HSAP). 5.2 These representations are specifically concerned with the strategy set out within the HSAP delivering new homes at Trowbridge. The key proposed changes identify additional dwellings to be delivered at the already proposed sites, but do not identify additional sites. 5.3 Under the HSAP, Trowbridge is projected to fall short of its Core Strategy housing target by a minimum of 1,297 dwellings. Barratt Homes feel that this figure will be significantly higher due to the Councils overly optimistic assumptions regarding delivery rates at the proposed allocations namely Ashton Park. 5.4 The Council are justifying this shortfall by saying that it will be met during the following plan period (i.e. 2016-2036). However, aside from being bad planning, this approach will further exacerbate pressure on other parts of the district to deliver the housing required under the current plan period (2006-2026), whilst also failing to deliver (among other things) the housing required to support the economic growth of Trowbridge. Ultimately, the strategy will delay the allocation of additional sites to a new local plan when they should be allocated under the HSAP. 5.5 The HSAP must, therefore, be found unsound as it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives of the Core Strategy and is inconsistent with national policy. 5.6 In order to be found sound, Barratt Homes believe it is imperative that additional sites are identified within the HSAP due to the pressing need to deliver homes at Trowbridge over the remaining years of the current plan period. 5.7 Given the sustainable performance and policy compliance of Maxcroft Farm in relation to the strategic priorities set out in the WCS, this is one such location that should be included.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	347	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC54				
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3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. 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However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

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<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	348	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC55				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				

assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

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3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

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<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	349	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
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assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

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This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. 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areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

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### 3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

#### Ashton Park

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3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

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#### APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

	<p>Sustainability Appraisal coupled with the lack of commentary on the decision not to allocate for the full housing needs at Trowbridge, means that the HSAP will not meet the needs of Wiltshire nor deliver a sound and objectively assessed plan. Land at Maxcroft Farm 4.6 The credentials of land at Maxcroft Farm were presented to the Council in a Technical Delivery Document as part of the representations on the Regulation 19 version of the HSAP. This document covered: the sustainability of the location; the environmental factors affecting the location; the realistic housing potential/capacity of the area in relation to the environmental effects of development; and the deliverability of the location. 4.7 This was also supported by detailed technical notes supporting this representation in order to address identified concerns from internal consultees at Wiltshire. 4.8 In terms of delivery, Barratt Homes are keen to stress that the delivery of this site is immediate and could be delivered from start on site (following allocation/consent) to practical completion within 24 months. 4.9 Given the issues with delivery in Wiltshire and the strategic settlements this must be considered a significant benefit of the site to realistically deliver well within the remaining plan period before 2026. As set out in the next section it is not thought that the allocations as they stand will achieve this aim. 5. CONCLUSION 5.1 These representations have been prepared by Pegasus Group on behalf of Barratt Homes (Bristol) in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan (HSAP). 5.2 These representations are specifically concerned with the strategy set out within the HSAP delivering new homes at Trowbridge. The key proposed changes identify additional dwellings to be delivered at the already proposed sites, but do not identify additional sites. 5.3 Under the HSAP, Trowbridge is projected to fall short of its Core Strategy housing target by a minimum of 1,297 dwellings. Barratt Homes feel that this figure will be significantly higher due to the Councils overly optimistic assumptions regarding delivery rates at the proposed allocations namely Ashton Park. 5.4 The Council are justifying this shortfall by saying that it will be met during the following plan period (i.e. 2016-2036). However, aside from being bad planning, this approach will further exacerbate pressure on other parts of the district to deliver the housing required under the current plan period (2006-2026), whilst also failing to deliver (among other things) the housing required to support the economic growth of Trowbridge. Ultimately, the strategy will delay the allocation of additional sites to a new local plan when they should be allocated under the HSAP. 5.5 The HSAP must, therefore, be found unsound as it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives of the Core Strategy and is inconsistent with national policy. 5.6 In order to be found sound, Barratt Homes believe it is imperative that additional sites are identified within the HSAP due to the pressing need to deliver homes at Trowbridge over the remaining years of the current plan period. 5.7 Given the sustainable performance and policy compliance of Maxcroft Farm in relation to the strategic priorities set out in the WCS, this is one such location that should be included.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	351	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC58				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				



assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 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This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). 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Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. 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<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	352	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC59				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				

assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges



needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). 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<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC60				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				

assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

### 3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

#### Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

#### APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

	<p>Sustainability Appraisal coupled with the lack of commentary on the decision not to allocate for the full housing needs at Trowbridge, means that the HSAP will not meet the needs of Wiltshire nor deliver a sound and objectively assessed plan. Land at Maxcroft Farm 4.6 The credentials of land at Maxcroft Farm were presented to the Council in a Technical Delivery Document as part of the representations on the Regulation 19 version of the HSAP. This document covered: the sustainability of the location; the environmental factors affecting the location; the realistic housing potential/capacity of the area in relation to the environmental effects of development; and the deliverability of the location. 4.7 This was also supported by detailed technical notes supporting this representation in order to address identified concerns from internal consultees at Wiltshire. 4.8 In terms of delivery, Barratt Homes are keen to stress that the delivery of this site is immediate and could be delivered from start on site (following allocation/consent) to practical completion within 24 months. 4.9 Given the issues with delivery in Wiltshire and the strategic settlements this must be considered a significant benefit of the site to realistically deliver well within the remaining plan period before 2026. As set out in the next section it is not thought that the allocations as they stand will achieve this aim. 5. CONCLUSION 5.1 These representations have been prepared by Pegasus Group on behalf of Barratt Homes (Bristol) in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan (HSAP). 5.2 These representations are specifically concerned with the strategy set out within the HSAP delivering new homes at Trowbridge. The key proposed changes identify additional dwellings to be delivered at the already proposed sites, but do not identify additional sites. 5.3 Under the HSAP, Trowbridge is projected to fall short of its Core Strategy housing target by a minimum of 1,297 dwellings. Barratt Homes feel that this figure will be significantly higher due to the Councils overly optimistic assumptions regarding delivery rates at the proposed allocations namely Ashton Park. 5.4 The Council are justifying this shortfall by saying that it will be met during the following plan period (i.e. 2016-2036). However, aside from being bad planning, this approach will further exacerbate pressure on other parts of the district to deliver the housing required under the current plan period (2006-2026), whilst also failing to deliver (among other things) the housing required to support the economic growth of Trowbridge. Ultimately, the strategy will delay the allocation of additional sites to a new local plan when they should be allocated under the HSAP. 5.5 The HSAP must, therefore, be found unsound as it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives of the Core Strategy and is inconsistent with national policy. 5.6 In order to be found sound, Barratt Homes believe it is imperative that additional sites are identified within the HSAP due to the pressing need to deliver homes at Trowbridge over the remaining years of the current plan period. 5.7 Given the sustainable performance and policy compliance of Maxcroft Farm in relation to the strategic priorities set out in the WCS, this is one such location that should be included.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	354	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC61				
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3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. 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However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

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<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	355	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC62				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				



assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

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3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

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<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	356	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
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assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges



needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

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This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. 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areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

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### 3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

#### Ashton Park

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3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

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#### APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

	<p>Sustainability Appraisal coupled with the lack of commentary on the decision not to allocate for the full housing needs at Trowbridge, means that the HSAP will not meet the needs of Wiltshire nor deliver a sound and objectively assessed plan. Land at Maxcroft Farm 4.6 The credentials of land at Maxcroft Farm were presented to the Council in a Technical Delivery Document as part of the representations on the Regulation 19 version of the HSAP. This document covered: the sustainability of the location; the environmental factors affecting the location; the realistic housing potential/capacity of the area in relation to the environmental effects of development; and the deliverability of the location. 4.7 This was also supported by detailed technical notes supporting this representation in order to address identified concerns from internal consultees at Wiltshire. 4.8 In terms of delivery, Barratt Homes are keen to stress that the delivery of this site is immediate and could be delivered from start on site (following allocation/consent) to practical completion within 24 months. 4.9 Given the issues with delivery in Wiltshire and the strategic settlements this must be considered a significant benefit of the site to realistically deliver well within the remaining plan period before 2026. As set out in the next section it is not thought that the allocations as they stand will achieve this aim. 5. CONCLUSION 5.1 These representations have been prepared by Pegasus Group on behalf of Barratt Homes (Bristol) in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan (HSAP). 5.2 These representations are specifically concerned with the strategy set out within the HSAP delivering new homes at Trowbridge. The key proposed changes identify additional dwellings to be delivered at the already proposed sites, but do not identify additional sites. 5.3 Under the HSAP, Trowbridge is projected to fall short of its Core Strategy housing target by a minimum of 1,297 dwellings. Barratt Homes feel that this figure will be significantly higher due to the Councils overly optimistic assumptions regarding delivery rates at the proposed allocations namely Ashton Park. 5.4 The Council are justifying this shortfall by saying that it will be met during the following plan period (i.e. 2016-2036). However, aside from being bad planning, this approach will further exacerbate pressure on other parts of the district to deliver the housing required under the current plan period (2006-2026), whilst also failing to deliver (among other things) the housing required to support the economic growth of Trowbridge. Ultimately, the strategy will delay the allocation of additional sites to a new local plan when they should be allocated under the HSAP. 5.5 The HSAP must, therefore, be found unsound as it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives of the Core Strategy and is inconsistent with national policy. 5.6 In order to be found sound, Barratt Homes believe it is imperative that additional sites are identified within the HSAP due to the pressing need to deliver homes at Trowbridge over the remaining years of the current plan period. 5.7 Given the sustainable performance and policy compliance of Maxcroft Farm in relation to the strategic priorities set out in the WCS, this is one such location that should be included.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	358	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC65				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				

assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 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This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). 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Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. 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<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	359	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC66				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				



assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). 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<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC67				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				

assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges



needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

	<p>Sustainability Appraisal coupled with the lack of commentary on the decision not to allocate for the full housing needs at Trowbridge, means that the HSAP will not meet the needs of Wiltshire nor deliver a sound and objectively assessed plan. Land at Maxcroft Farm 4.6 The credentials of land at Maxcroft Farm were presented to the Council in a Technical Delivery Document as part of the representations on the Regulation 19 version of the HSAP. This document covered: the sustainability of the location; the environmental factors affecting the location; the realistic housing potential/capacity of the area in relation to the environmental effects of development; and the deliverability of the location. 4.7 This was also supported by detailed technical notes supporting this representation in order to address identified concerns from internal consultees at Wiltshire. 4.8 In terms of delivery, Barratt Homes are keen to stress that the delivery of this site is immediate and could be delivered from start on site (following allocation/consent) to practical completion within 24 months. 4.9 Given the issues with delivery in Wiltshire and the strategic settlements this must be considered a significant benefit of the site to realistically deliver well within the remaining plan period before 2026. As set out in the next section it is not thought that the allocations as they stand will achieve this aim. 5. CONCLUSION 5.1 These representations have been prepared by Pegasus Group on behalf of Barratt Homes (Bristol) in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan (HSAP). 5.2 These representations are specifically concerned with the strategy set out within the HSAP delivering new homes at Trowbridge. The key proposed changes identify additional dwellings to be delivered at the already proposed sites, but do not identify additional sites. 5.3 Under the HSAP, Trowbridge is projected to fall short of its Core Strategy housing target by a minimum of 1,297 dwellings. Barratt Homes feel that this figure will be significantly higher due to the Councils overly optimistic assumptions regarding delivery rates at the proposed allocations namely Ashton Park. 5.4 The Council are justifying this shortfall by saying that it will be met during the following plan period (i.e. 2016-2036). However, aside from being bad planning, this approach will further exacerbate pressure on other parts of the district to deliver the housing required under the current plan period (2006-2026), whilst also failing to deliver (among other things) the housing required to support the economic growth of Trowbridge. Ultimately, the strategy will delay the allocation of additional sites to a new local plan when they should be allocated under the HSAP. 5.5 The HSAP must, therefore, be found unsound as it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives of the Core Strategy and is inconsistent with national policy. 5.6 In order to be found sound, Barratt Homes believe it is imperative that additional sites are identified within the HSAP due to the pressing need to deliver homes at Trowbridge over the remaining years of the current plan period. 5.7 Given the sustainable performance and policy compliance of Maxcroft Farm in relation to the strategic priorities set out in the WCS, this is one such location that should be included.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	361	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC68				
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3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. 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<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	362	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC69				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				

assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

### 3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

#### Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

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3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

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<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	363	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
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assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

### 3. IMPLICATIONS FOR PROPOSED ALLOCATIONS Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

#### APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

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This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

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3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

Ashton Park

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3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

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3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges



needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

	<p>Sustainability Appraisal coupled with the lack of commentary on the decision not to allocate for the full housing needs at Trowbridge, means that the HSAP will not meet the needs of Wiltshire nor deliver a sound and objectively assessed plan. Land at Maxcroft Farm 4.6 The credentials of land at Maxcroft Farm were presented to the Council in a Technical Delivery Document as part of the representations on the Regulation 19 version of the HSAP. This document covered: the sustainability of the location; the environmental factors affecting the location; the realistic housing potential/capacity of the area in relation to the environmental effects of development; and the deliverability of the location. 4.7 This was also supported by detailed technical notes supporting this representation in order to address identified concerns from internal consultees at Wiltshire. 4.8 In terms of delivery, Barratt Homes are keen to stress that the delivery of this site is immediate and could be delivered from start on site (following allocation/consent) to practical completion within 24 months. 4.9 Given the issues with delivery in Wiltshire and the strategic settlements this must be considered a significant benefit of the site to realistically deliver well within the remaining plan period before 2026. As set out in the next section it is not thought that the allocations as they stand will achieve this aim. 5. CONCLUSION 5.1 These representations have been prepared by Pegasus Group on behalf of Barratt Homes (Bristol) in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan (HSAP). 5.2 These representations are specifically concerned with the strategy set out within the HSAP delivering new homes at Trowbridge. The key proposed changes identify additional dwellings to be delivered at the already proposed sites, but do not identify additional sites. 5.3 Under the HSAP, Trowbridge is projected to fall short of its Core Strategy housing target by a minimum of 1,297 dwellings. Barratt Homes feel that this figure will be significantly higher due to the Councils overly optimistic assumptions regarding delivery rates at the proposed allocations namely Ashton Park. 5.4 The Council are justifying this shortfall by saying that it will be met during the following plan period (i.e. 2016-2036). However, aside from being bad planning, this approach will further exacerbate pressure on other parts of the district to deliver the housing required under the current plan period (2006-2026), whilst also failing to deliver (among other things) the housing required to support the economic growth of Trowbridge. Ultimately, the strategy will delay the allocation of additional sites to a new local plan when they should be allocated under the HSAP. 5.5 The HSAP must, therefore, be found unsound as it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives of the Core Strategy and is inconsistent with national policy. 5.6 In order to be found sound, Barratt Homes believe it is imperative that additional sites are identified within the HSAP due to the pressing need to deliver homes at Trowbridge over the remaining years of the current plan period. 5.7 Given the sustainable performance and policy compliance of Maxcroft Farm in relation to the strategic priorities set out in the WCS, this is one such location that should be included.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	365	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC72				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				

assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 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This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). Other Site Allocations 3.14 The remaining site allocations and their expected delivery are summarised as follows (PC13, PC51 and PC54-73): [TABLE INSERT] 3.15 Section 5 of the previous representations to the Regulation 19 Local Plan also included a critique of the other site allocations within Trowbridge. This still remains very much relevant and we would direct the Inspector to review its contents. 3.16 In essence, the assessment points out that the allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward. There are, therefore, concerns with regards to the deliverability of these sites within a timely manner (i.e. within the plan period). Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. The previous representations set out why this thinking was flawed. To summarise: Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area; There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations; The Core Strategy is unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; The Core Strategy also defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and Explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge (Staverton). 4.2 Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements. 4.3 It is noted that in the Councils submission documents, Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1) (c) (WHSAP/09), the Council notes the importance of retaining the separate identities of Hilperton, North Bradley and Southwick. Crucially, both Southwick and North Bradley are currently separated by open countryside from the Trowbridge urban area, compared to Hilperton which already forms part of the continuous urban area. Furthermore, the plan goes on to allocated sites adjacent North Bradley, although sets out that a strategic gap should be maintained. This view that Hilperton is a separate village does not recognise the existing pattern of development across north Trowbridge. 4.4 Either way, the delivery of development at Maxcroft Farm in Hilperton would contribute to addressing the shortfall within the Trowbridge CA, whether it is viewed as development at Trowbridge, Hilperton or both. 4.5 Regardless, it is clear that the development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the continuing lack of assessment of Maxcroft Farm as part of the

	<p>Sustainability Appraisal coupled with the lack of commentary on the decision not to allocate for the full housing needs at Trowbridge, means that the HSAP will not meet the needs of Wiltshire nor deliver a sound and objectively assessed plan. Land at Maxcroft Farm 4.6 The credentials of land at Maxcroft Farm were presented to the Council in a Technical Delivery Document as part of the representations on the Regulation 19 version of the HSAP. This document covered: the sustainability of the location; the environmental factors affecting the location; the realistic housing potential/capacity of the area in relation to the environmental effects of development; and the deliverability of the location. 4.7 This was also supported by detailed technical notes supporting this representation in order to address identified concerns from internal consultees at Wiltshire. 4.8 In terms of delivery, Barratt Homes are keen to stress that the delivery of this site is immediate and could be delivered from start on site (following allocation/consent) to practical completion within 24 months. 4.9 Given the issues with delivery in Wiltshire and the strategic settlements this must be considered a significant benefit of the site to realistically deliver well within the remaining plan period before 2026. As set out in the next section it is not thought that the allocations as they stand will achieve this aim. 5. CONCLUSION 5.1 These representations have been prepared by Pegasus Group on behalf of Barratt Homes (Bristol) in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan (HSAP). 5.2 These representations are specifically concerned with the strategy set out within the HSAP delivering new homes at Trowbridge. The key proposed changes identify additional dwellings to be delivered at the already proposed sites, but do not identify additional sites. 5.3 Under the HSAP, Trowbridge is projected to fall short of its Core Strategy housing target by a minimum of 1,297 dwellings. Barratt Homes feel that this figure will be significantly higher due to the Councils overly optimistic assumptions regarding delivery rates at the proposed allocations namely Ashton Park. 5.4 The Council are justifying this shortfall by saying that it will be met during the following plan period (i.e. 2016-2036). However, aside from being bad planning, this approach will further exacerbate pressure on other parts of the district to deliver the housing required under the current plan period (2006-2026), whilst also failing to deliver (among other things) the housing required to support the economic growth of Trowbridge. Ultimately, the strategy will delay the allocation of additional sites to a new local plan when they should be allocated under the HSAP. 5.5 The HSAP must, therefore, be found unsound as it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives of the Core Strategy and is inconsistent with national policy. 5.6 In order to be found sound, Barratt Homes believe it is imperative that additional sites are identified within the HSAP due to the pressing need to deliver homes at Trowbridge over the remaining years of the current plan period. 5.7 Given the sustainable performance and policy compliance of Maxcroft Farm in relation to the strategic priorities set out in the WCS, this is one such location that should be included.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	366	<b>Consultee</b> Barratt Homes (Bristol)	<b>Agent</b> Strategic Planner Pegasus Group	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1132626	<b>Person ID:</b> 1187757	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC73				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1. INTRODUCTION 1.1 This submission is made by Barratt Homes (Bristol) Ltd in response to the Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents being carried out by Wiltshire Council as part of the preparation of the Housing Site Allocations Plan Examination. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations Plan (HSAP) along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. 1.3 This was followed by a procedural letter from the Inspector in August 2018 which required the Council to undertake a consultation on the Schedule of Proposed Changes to the HSAP, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence. 1.4 These representations set out Barratt Homes response to these proposed changes and have been prepared having regard to the requirements set out by the National Planning Policy Framework (NPPF). 1.5 Barratt Homes has land interests in the Trowbridge area and have submitted representations at previous stages of the HSAPs preparation in support of allocating land in this location. These specific representations relate to land at Maxcroft Farm in Hilperton, which forms part of the wider Trowbridge Urban Area. 1.6 The following proposed changes are, therefore, considered to be of particular relevance: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. 1.7 Unfortunately, the proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge. As such, the fundamental thrust of arguments made in previous representations remains the same. 1.8 These key points are considered further in Sections 2, 3 and 4 of these representations, but their content is summarised briefly below: The proposed changes have done nothing to address the shortfall anticipated over the remaining years of the plan period at Trowbridge; The delivery of housing at Trowbridge over the remaining years of the plan period continue to rely on the delivery of housing at a strategic site (Ashton Park) where anticipated delivery trajectories are overly optimistic; There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park; The plan simply continues to postpone the delivery of housing at Trowbridge until after the plan period which is an unacceptable approach; The Council should, therefore, look to allocate additional sites to meet Trowbridges housing needs over the remaining years of the plan period and these should include land at Maxcroft Farm. 1.9 Given the above, it is our belief that the plan continues to fail when assessed against the four tests of soundness, as set out at paragraph 35 of the NPPF: Positively prepared the plan fails to meet the objectively</p>				

assessed development and infrastructure requirements of a key strategic settlement (Trowbridge); Justified the plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives, based on evidence; Effective the plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy; and Consistent with national policy a key priority for national planning policy is to boost significantly the supply and delivery of housing. This plan fails to plan for housing at a key strategic settlement with little more than 8 years left in the plan period. 1.10 Land at Maxcroft Farm represents a sustainable and deliverable location for housing development that can support the needs of Trowbridge and Hilperton. Given that housing delivery at Trowbridge is particularly reliant on a large strategic site (Ashton Park) which has suffered significant delays, the risk of further non-delivery of housing at a key strategic settlement in Wiltshire is exacerbated by this plan. The risk for Wiltshire is that the HSAP provides another adopted development plan document that has manifestly failed to address key issues with regard to the delivery and supply of housing. 1.11 The failure to address these issues would simply result in their deferral to a future development plan document or leave them to be addressed via the development management process. 1.12 Barratt Homes trust that the comments contained in these representations will be carefully considered and appropriately responded to by Wiltshire Council in their submission to the Secretary of State. 2. KEY CHANGES MADE TO HSAP 2.1 Some 135 changes are proposed to the HSAP. None of these were particularly fundamental to the overall approach of the plan, with the majority of them relating to factual corrections and tweaks to site allocations. 2.2 The more significant changes relate to the removal of site allocations from the plan at Crudwell, Malmesbury and Market Lavington. The Councils rationale for this was that development at these locations could be addressed through the delivery of Neighbourhood Plans. Barratt Homes do not have any specific comments to make regarding these specific changes. 2.3 To repeat, the specific changes these representations relate to are: PC13 and PC51 which amends the table relating to the quantum of development anticipated at the proposed allocations at Trowbridge; PC25 which revises the anticipated quantum of development at the proposed allocations at Trowbridge and the extent of the shortfall expected over the plan period; and PC54-PC73 which relate to amendments made to the proposed allocations at Trowbridge. Implications for Trowbridge 2.4 The fundamental strategy for Trowbridge has not been changed. Whilst the expected quantum of housing to be delivered on the HSAP sites has been revised to the extent where an additional c. 250 dwellings (800 1,050) are now expected to be delivered, the bulk of housing to be delivered is still reliant on the delivery of the long-term allocated site at Ashton Park to meet its housing target identified in the Wiltshire Core Strategy. 2.5 Given the delays in housing coming forward at Ashton Park, the Council are now only expecting the site to deliver 1,350 dwellings over the remaining plan period where it had previously been expected to deliver 1,600 dwellings. They are expecting the remainder (1,250 dwellings) to be delivered post 2026. This reduction has largely cancelled out the additional dwellings that are expected to be delivered at the other allocated sites over the remaining years of the plan period. 2.6 It should be noted that Barratt Homes question this delivery trajectory and consider the Councils assumptions to be overly optimistic. The reasons for this are set out in Section 3 below. 2.7 Regardless, there will be a shortfall in the number of dwellings delivered at Trowbridge over the plan period. This shortfall is expected to be 1,297 dwellings (PC25) which is broadly equivalent to the number of dwellings the Council expects to be delivered at Ashton Park beyond the end of the plan period (1,250). This is not a sound approach and fails to comply with paragraph 182 of NPPF 2012 (since replaced by paragraph 35 of the NPPF 2018). Key Concerns 2.8 Barratt Homes have previously made representations to the HSAP, expressing concerns with the overall approach to delivering housing at Trowbridge in September 2017. 2.9 As the fundamental strategy for Trowbridge has not changed, the thrust of the previous representations is still very much relevant. The key points made within those representations were as follows: There has been a pattern of failure across the district to deliver dwellings at key strategic sites at Chippenham, Salisbury and Trowbridge. There are serious question marks with regard to the delivery of any dwellings at Ashton Park between now and the end of the plan period, with no evidence in terms of a delivery timetable that the 1,350 dwellings that are anticipated by the Council can be completed; As such, it is clear that the large strategic sites have failed to deliver housing in the short-term and will run over into the next plan period; This has led to development pressure elsewhere within the plan area where a number of towns have seen planning by appeal and these will now deliver in excess of the indicative requirements as set out in the Wiltshire Core Strategy (WCS). We expect that the failure to deliver housing at these identified sites will exacerbate pressures on other

areas within Wiltshire to accommodate more growth and undermine the spatial distribution of the WCS; This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,297 homes (the changes to the HSAP revised this figure from 1,220 homes) still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire. There is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS. Whilst the HSAP provides some limited commentary on the decision not to address the shortfall in Trowbridge, the ramifications of this decision are not examined in the Sustainability Assessment (SA). The non-allocation of homes at a Principal Settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is a clear and obvious requirement to allocate a full amount at Trowbridge.

2.10 Moreover, the failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridges status as Wiltshires County Town. The failure to plan to meet its housing needs in full under the HSAP would not be in line with the Towns status and the stated ambitions of locally democratic elected bodies.

Amendments to Trowbridge Settlement Boundary

2.11 In addition to the above, Barratt would like to formally register their support for the proposed amendments to the settlement boundary at Hilperton and Trowbridge which now captures parts of the built-up area that were previously excluded.

### 3. IMPLICATIONS FOR PROPOSED ALLOCATIONS

#### Ashton Park

3.1 In addition to the above, Barratt Homes would wish to elaborate further on the deliverability issues at Ashton Park, specifically in reference to the definition of deliverable as set out within the revised NPPF (2018).

3.2 The representations to the Regulation 19 version of the plan were submitted in September 2017. Over a year has since passed and the Ashton Park site still remains without outline planning permission, albeit it is understood that it was resolved to grant permission in April 2018, subject to the signing of a S106 agreement. This agreement had not yet been signed at the time of writing these representations.

3.3 The NPPFs definition of deliverable (for the purpose of Housing Land Supply assessments) states that sites with outline permission or allocated within development plans are not considered to be capable of delivering dwellings unless there is clear evidence that housing completions will begin on site within five years.

3.4 The Council have not provided any clear evidence to suggest that Ashton Park is capable of delivering any dwellings over the next five years. However, the Council are expecting it to deliver 1,350 dwellings by the end of the plan period (2026). With around 7-8 years left of the plan period and the assumption that no dwellings are likely to be delivered over the next five years, the Council appear to be expecting the site to deliver somewhere in the region of 450-675 dwellings per year over the last 2-3 years of the plan period.

3.5 Lichfields produced a research paper entitled Start to Finish: How Quickly do Large-Scale Housing Sites Deliver (November 2016). In their assessment of build-out rates, they noted that the average annual build-out rate for a scheme of 2,000+ dwellings was 161 dwellings per annum (dpa). The highest build out rate of the sites they assessed was 321 dpa (Cranbrook). Even taking this higher figure, the Councils anticipated delivery trajectory for Ashton Park is clearly overly optimistic. The full report is attached at Appendix 1.

#### APPENDIX 1: LICHFIELDS (NOVEMBER 2016) START TO FINISH: HOW QUICKLY DO LARGE-SCALE HOUSING SITES DELIVER

3.6 Notwithstanding this, the delivery of the bulk of housing at the site is reliant on the provision of a new bypass. It is understood that only around 300 dwellings could be delivered in advance of this key piece of infrastructure. This is another key issue that will have significant implications for delivery of dwellings at Ashton Park.

3.7 Taken together, this means that the shortfall of housing delivery at Trowbridge will be even more significant than the HSAP currently suggests both in the short and longer term.

3.8 This also has implications for the delivery of housing across the district in locations (e.g. Chippenham and Salisbury) which are also heavily reliant on the delivery of housing at strategic development locations to meet their Core Strategy targets. Indeed, the Councils overly optimistic view of delivery trajectories for strategic sites, coupled with an under provision of allocations that are deliverable over the remaining years of the plan period means that the prospect of a housing shortfall would not be confined to the Trowbridge area alone.

3.9 The Council argue that not addressing this shortfall under the HSAP is justified because Trowbridges

needs will be met by housing delivery under a future plan period. However, failing to address important issues of delivery, especially when there is a clear onus from the government to significantly boost the supply of housing, is not an appropriate position to take and fails to comply with paragraph 182 of the NPPF 2012. 3.10 There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district. 3.11 The Councils decision to pursue a strategy that effectively postpones the delivery of housing at a key strategic settlement such as Trowbridge to a future plan period is unacceptable and unsound. The plan accepts that there will be a shortfall in the delivery of housing at Trowbridge over the current plan period to the tune of 1,297 dwellings. This figure is based on a overly optimistic view as to the quantum of homes that might be delivered by the end of the current plan period (1,350 dwellings) and, as such, we would expect this shortfall to be even more substantial than is currently predicted. 3.12 Given the extent of this shortfall and the implications for failing to deliver a sufficient quantum of homes at Trowbridge under the current plan period, there is a clear need to identify additional housing sites that can deliver housing in the shorter term (i.e. within the remaining years of the plan period). 3.13 Land at Maxcroft Farm is one such site that could deliver housing in the shorter-term help Trowbridge to meet its housing requirements to the end of the current plan period (2026). 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Again, the HSAP has not identified a suitable set or quantum of sites that will ensure the delivery of housing at Trowbridge in the short term. 3.17 The strategy, in identifying an insufficient number of sites, some (if not all) of which may be unsuitable to be delivered in the plan period, simply postpones the inevitable allocation of further sites at Trowbridge to later plan periods when it should be doing so now. 3.18 The plan is, therefore, unsound because it has not been positively prepared, its strategy is unjustified, it will be ineffective in meeting its strategic objectives and is inconsistent with national policy. 4. LAND AT MAXCROFT FARM Hilperton and Trowbridge 4.1 As stated previously, Barratt Homes have a specific interest in Land at Maxcroft Farm, Hilperton. However, there has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge. 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<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136226</p>		

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
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<b>Comment ID:</b>	367	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187773	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I am writing to support the proposed change (PC92) to remove the Ridgeway Farm, Crudwell site (Housing Allocation H2.13) from the Wiltshire Housing Site Allocations Plan. The proposed development at Ridgeway Farm is inappropriately large and were it to go ahead, would have a detrimental impact on the community for all the reasons stated in previous consultations. The proposed change to have this development removed from the WHSAP is therefore welcomed and we support it on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. The Crudwell Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring) and will allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future I trust that this and similar representations will result in PC92 going ahead and thank you for your consideration in this matter. Please acknowledge safe receipt of this letter. Thank you.				
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<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	368	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1054271	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC64				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>The Hilperton Neighbourhood Development Plan clearly states in policies 1d, 1e, 1f, and 1g what mitigation etc. is required if any houses are built west of the relief road. The new number proposed by the council cannot possibly meet these policies. H2.3 was a knee jerk reaction by WC to try to achieve housing target numbers. The whole allocation should be scrapped when the examination/inspection of the plan takes place. What is the point of an NP if its policies can be ignored? The increased number of houses proposed for H2.3 (increased from 205 to 355) is not achievable. The increase in area (16.33ha to 21.24ha) does not justify this increase in numbers. Much of the extra acreage consists of the balancing ponds for the relief road! I read a report recently condemning new housing being built next to new 'by-passes'. This is EXACTLY what WC is suggesting. It is not green, it is not sustainable. It is madness. How long before another by-pass is required for the new by-pass (Elizabeth Way) which opened only a year or two ago? There seems to be a total lack of joined-up planning at Wiltshire Council but it seems happy to ignore its own policies when it suits them. The original number of houses for this site (212) was set by Wiltshire Council in June 2017 and, at that time, WC stated 'although mitigation measures could reduce this number'. How WC now feels that 355 houses can be accommodated with mitigation measures is a mystery known only to the spatial planning team at County Hall. I find it bizarre that WC concedes that approx. 3/4 of site 263 'appears to be grade 3a agricultural land' and yet is still happy to cover it in concrete and tarmac..</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>No, the Proposed Change does not meet a previous objection</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	369	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1126734	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. I am very concerned because there has been no environmental or ecological survey. I live at the back of the field to be built on. There is a lot of wildlife. We have many bats flying along through the summer evening in our garden. We have Kingfishers, woodpeckers, flocks of fieldfares in winter amongst many birds. We have many hedgehogs, mammals, butterflies, and orchids that have come from the field as well as snakes and lizards. Building on this field will destroy important habitat for wildlife. These animals are already under threat. A survey needs to be completed as to the species of bats and wildlife in the field. The owner of the field ripped up the land, the trees and hedges so he can build there. The wildlife has come into our garden from the field, but still survives there.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			

<b>proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

Comment ID:	370	<b>Consultee</b> <b>Person ID:</b> 1187775	<b>Agent</b> Director Benchmark Development Planning Ltd <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be legally compliant?</b> No
				<b>Do you consider the Proposed Change to be sound?</b> No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy
<b>Identify Proposed Change Reference Number</b>		PC3		
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 3 and Annex A Table 4.1 Housing Land Supply Whilst also Re-Promoting an additional allocation of land for housing at Britford Park & Ride and adjoining land, Salisbury. [TABLE INSERT] 1. Because the latest completion and commitment figures (PC3) for South Wiltshire (and North and West Wiltshire) increase significantly the minimum to be allocated 2017 2026 (see 5th column above) the Authority (and now the Inspector) need to respond in a sound and responsible and timely way. 2. In the case of South Wiltshire, plainly there is a need to allocate something like twice as much housing because 594 was the target to be allocated in 2017 and the Council now (September 2018) needs to identify a further 737 more houses to bring up the amount of housing to meet the minimum housing requirement up to 1,331. Wiltshire Council is not proposing to do anything about this. 3. In our opinion, the Council (and now the Inspector) must increase the amount of land to be allocated for housing in a commensurate way to meet need and ensure a 5-year housing land supply. (See also our comments regarding other Proposed Changes.) [Reps 372 - 377] 4. Furthermore, the wording of the first column as Minimum to be allocated fails to indicate a likely acceptable range contrary to NPPF (1) 6: Delivering a wide choice of high-quality homes. NPPF (1) promotes flexibility and delivery through, inter alia, the use of an additional buffer (para 47). We are therefore asking the Inspector under Section 20 (7C) - because there are only about 7 years left until the end of the plan period (2026) - and given housing need - to identify sufficient land to come forward. It is reasonable to suggest a 5% range, on top of the minimum requirement. We set out below our proposed amendment to Table 4.1. For South Wiltshire, this means the target range should be between 1,331 and 1,852 dwellings between 2017 2026. [TABLE INSERT] 5. Background argument: PC3 is not legally compliant because: (i) it does not appropriately reflect guiding legislation; (ii) nor is it in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 6. The proposed change is not sound because whilst the numbers are factual, the Authority has failed to react to what the new numbers mean and therefore we say this draft document: (1) it is not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) it is not sufficiently justified; (3) it is not able to respond to change; and, (4) it is not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 7. We are asking the Inspector to amend PC 3, Table 4.1 and Annex A - but particularly Table 4.1 (see our suggestion above) and the explanatory wording (our suggestions are in bold below). - factual update to table of figures to reflect the latest Housing Land Supply Statement published March 2018 (base date April 2017) and and commensurate increase in housing land to accord with Section 6 of NPPF (1) by adding the land at Britford Park & Ride for at least 100 dwellings (see enclosed details).		

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	5136569		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	No, the Proposed Change does not meet a previous objection		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	Yes	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	Yes



<b>Comment ID:</b>	371	<b>Consultee</b> Winterslow Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 391900		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified	
<b>Identify Proposed Change Reference Number</b>	SBR PC41				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Reference Table 38.1 Map Grid Ref. F5,F6,G5,G6 Beechwood The text states: Further changes to reflect the Wiltshire Councillors and Parish/Town Council Consultation Winterslow Parish Council has not proposed and does not support this change. We are not aware of any evidence submitted by Wiltshire Councillors that would soundly justify the proposed change. The Parish Council responded to previous consultations on the DPD and is therefore disappointed that such a significant new proposal should have been approved by WC without any communication with the Parish Council. The garden is site number 3408 in WC SHELAA 2017. The site is documented as having a capacity of 32 homes. If the site remains within the Settlement Boundary it would effectively be a substantial Site Allocation within our village. Other local landowners will justifiably challenge such a decision. The draft DPD clearly states that WC does not propose any site allocations in Large Villages. In Topic Paper 1 Para 7.18 the principle is set out that large gardens shall be excluded. The consultation raised concerns about small parcels of open land on the edge of settlements. This site is NOT a small parcel. In Para 7.20 the Conclusion states: The methodology will include the curtilage of a property that relates more closely to the built environment, e.g. a garden), or has limited capacity to extend the built form of the settlement in terms of scale and location The site is much larger than a reasonably sized garden and has much more than a limited capacity. The Conclusion then states: However, it will exclude the curtilage of a property that relates more closely to the open countryside, e.g. a field or a paddock, or has the capacity to substantially extend the built form of the settlement in terms of scale and location . Although the site is not a paddock it is 0.9 ha and (as evidenced by the SHELAA) has the capacity to substantially extend the built form of the settlement in terms of BOTH scale AND location . Previous comments have made reference to the draft Winterslow Neighbourhood Plan. We understand that such considerations are excluded from the DPD process relating to Settlement Boundaries. For the record, however, this site is no longer in our draft NP and ,currently, the NP process in Winterslow has been paused by the Parish Council. Winterslow Parish Council respectfully requests that this change be removed from the DPD.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018)</b>		

<b>document this representation relates to:</b>		<b>or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	372	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187775	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC17				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 16 and PC 17: Five Year Housing Land Supply These are the Propose Changes we are concerned about - quoted verbatim PC 16 - "Housing trajectories are site by site estimates of start and finish dates and annual completions. Aggregating housing trajectories for each HMA shows how the Plan helps to deliver in excess of five years supply of land in each area for the remaining years of the plan period. The table below provides estimates of how many years supply there will be in each remaining year of the plan period. It shows that supply exceeds the five - year requirement through to the end of the plan period for all years except one four in the South Wiltshire HMA and well before by then additional allocations will be included within the review of the WCS." (Source: EXAM.01.01 p6 Sept 2018) PC17 [TABLE INSERT] 1. Summary of our 5 Year Housing Land Supply objection: the proposed latest information (above) is contrary to NPPF (1) 6: Delivering a wide choice of high-quality homes with respect to both South Wiltshire and N/W Wiltshire. The Framework (1) now imposes a duty on Wiltshire Council to take steps to rectify the problem and not rely on a later review of the WCS (Wiltshire Core Strategy) that may take several years. 2. This DPD needs to provide now a reliable and realistic, planned 2018 - 2026, 5 Year Supply to deliver much needed homes of a type and tenure in the right place continuously. 3. Having more than a 5 years housing land supply (much better to have at least 7 or 8 years) also encourages commensurate with the amount - greater choice for consumers. This keeps house prices lower through competition. Having more than 5 years land supply is essential it brings greater surety and greater resilience , should one or more sites be delayed. To correct this flaw that is painfully obvious in PCs 16 and 17, more developable and deliverable land, in accordance with Footnotes 11 and 12 on p12 of NPPF (1) - must be brought forward such as the land at Britford Park &amp; Ride, within the settlement boundary at Salisbury. Benchmarks proposed revisions to PC 17 include: [TABLE INSERT] 4. PC16 and 17 are not legally compliant because: (i) they do not appropriately reflect guiding legislation; (ii) nor are they in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of highquality homes. 5. PC 16 and PC 17 Table 4.8 and supporting text are not sound because: (1) they are not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) they are not sufficiently justified; (3) they are not able to respond to change; and, (4) they are not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 6. We are asking the Inspector to amend PC 16 and PC17 and Annex A particularly the table (see above) and also the explanatory wording by allocating more land for housing in South Wiltshire (an N + W Wiltshire, too) - and we are proposing land at Britford Park &amp; Ride and adjoining land for allocation (see our objections to PC 3 etc.) [ Rep 370 ].</p>				

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	5136588		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	No, the Proposed Change does not meet a previous objection		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	Yes	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	Yes

<b>Comment ID:</b>	373	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187775	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC16				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 16 and PC 17: Five Year Housing Land Supply These are the Propose Changes we are concerned about - quoted verbatim PC 16 - "Housing trajectories are site by site estimates of start and finish dates and annual completions. Aggregating housing trajectories for each HMA shows how the Plan helps to deliver in excess of five years supply of land in each area for the remaining years of the plan period. The table below provides estimates of how many years supply there will be in each remaining year of the plan period. It shows that supply exceeds the five - year requirement through to the end of the plan period for all years except one four in the South Wiltshire HMA and well before by then additional allocations will be included within the review of the WCS." (Source: EXAM.01.01 p6 Sept 2018) PC17 [TABLE INSERT] 1. Summary of our 5 Year Housing Land Supply objection: the proposed latest information (above) is contrary to NPPF (1) 6: Delivering a wide choice of high-quality homes with respect to both South Wiltshire and N/W Wiltshire. The Framework (1) now imposes a duty on Wiltshire Council to take steps to rectify the problem and not rely on a later review of the WCS (Wiltshire Core Strategy) that may take several years. 2. This DPD needs to provide now a reliable and realistic, planned 2018 - 2026, 5 Year Supply to deliver much needed homes of a type and tenure in the right place continuously. 3. Having more than a 5 years housing land supply (much better to have at least 7 or 8 years) also encourages commensurate with the amount - greater choice for consumers. This keeps house prices lower through competition. Having more than 5 years land supply is essential it brings greater surety and greater resilience , should one or more sites be delayed. To correct this flaw that is painfully obvious in PCs 16 and 17, more developable and deliverable land, in accordance with Footnotes 11 and 12 on p12 of NPPF (1) - must be brought forward such as the land at Britford Park &amp; Ride, within the settlement boundary at Salisbury. Benchmarks proposed revisions to PC 17 include: [TABLE INSERT] 4. PC16 and 17 are not legally compliant because: (i) they do not appropriately reflect guiding legislation; (ii) nor are they in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of highquality homes. 5. PC 16 and PC 17 Table 4.8 and supporting text are not sound because: (1) they are not sufficiently positively prepared with respect to the delivery of a surety of housing land supply; (2) they are not sufficiently justified; (3) they are not able to respond to change; and, (4) they are not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 6. We are asking the Inspector to amend PC 16 and PC17 and Annex A particularly the table (see above) and also the explanatory wording by allocating more land for housing in South Wiltshire (an N + W Wiltshire, too) - and we are proposing land at Britford Park &amp; Ride and adjoining land for allocation (see our objections to PC 3 etc.) [ Rep 370 ].</p>				

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	5136588		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	No, the Proposed Change does not meet a previous objection		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	Yes	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	Yes

<b>Comment ID:</b>	374	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187775	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC15				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objection to PC 15 and Annex A Table 4.7 Windfall and Housing Land Supply Re-Promoting Land at Britford Park &amp; Ride and adjoining land, Salisbury [TABLE INSERT] 1. Summary of our windfall objection: the proposed latest windfall allowance 2017 - 2026 in the 5th column seeks to increase the windfall allowance to try to fix the increasing housing land shortfall (see our objection to PC 3 etc). In our opinion, this is contrary to NPPF (1) that is tilted 6: Delivering a wide choice of high-quality homes and also deals with windfall housing. 2. NPPF (1) para 48 promotes flexibility and delivery and warns Planning Authorities not to use an allowance for windfall sites unless the evidence is - realistic - reliable and - compelling. No such evidence has been submitted and those numbers should be viewed with caution. 3. Further, with the considerable tightening of all the main settlements boundaries and the exclusion of residential gardens, infill windfall brownfield housing cannot be a reliable supply: it is a dwindling asset, particularly at Salisbury. The forecast amount of windfall sites coming forward should be conservative, robust and reliable, not hopeful and optimistic (fingers crossed). 4. It is very important point to note and in fairness to the Authority, Wiltshire Council do indeed (of course) concede this at para 5.7 of Topic Paper 3 (July 2018): the use of a windfall allowance should not be relied upon. 5. However, it is not realistic to say windfalls should be completely not relied upon. This is too extreme and contradictory a position for the Authority to take. Para 5.7 should be amended accordingly. 6. We are therefore again placing before the Inspector under S20 (7C) an invitation to correct this significant flaw and contradiction in the DPD and supporting paperwork. We are suggesting a simple, robust and reliable 4% windfall allowance (4% of the minimum housing requirement). In the context of our Objection to PC15, this means the windfall for South Wiltshire should be c. 420 dwellings rather than c. 740 between 2017 - 2026: [TABLE INSERT] 7. Forgive the complexity of the next table, but we have applied the 4% windfall to Table 4.7 whilst also taking into account our objection to PC 3 regarding the need to allocate more housing land and identify a housing requirement range, rather than an absolute minimum (that the Authority seem to be treating as being an acceptable maximum target) [TABLE INSERT] 8. Background argument : PC15 is not legally compliant because: (i) it does not appropriately reflect guiding legislation; (ii) nor is it in line with national policy, NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 9. The proposed change in Table 4.7 is not sound because: (1) it is not sufficiently positively prepared with respect to the delivery of a surety of housing land supply ; (2) it is not sufficiently justified; (3) it is not able to respond to change; and, (4) it is not consistent with the NPPF (1) particularly Section 6: Delivering a wide choice of high quality homes. 10. We are asking the Inspector to amend</p>				

	PC 15 and Annex A and particularly Table 4.7 (see above) and also the explanatory wording at Para 5.7 of The Topic Paper 3: HLSA (July 2018).		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5136598		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes



<b>Comment ID:</b>	375	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187775	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC29				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[PLEASE SEE THE ATTACHED DOCUMENT FOR THE FULL REPRESENTATION] Objection to PCs 29 30 and 31: The dropping of Churchfields and the strategy for Salisbury in the context of Re-Promoting Brownfield land within the settlement boundary at Britford Park &amp; Ride and adjoining land, Salisbury [TABLE INSERT] Objections to PC 29, 30 and 31 on the basis that Wiltshire Council has not adopted sound or realistic build out rates and not allocated enough land 2017 2026 1. PCs 29 and 30 confirm the dropping of Churchfields that was to provide 1,100 dwellings between 2017 2026 from the draft Housing DPD. This is a major change. 2. In part, Fugglestone Red is being put forward as its replacement, but that site is already identified in the Wiltshire Core Strategy (2015) to provide 1,250 new homes and 8 hectares of employment land (to assist with decanting businesses from Churchfields during the 2020s). Whilst the house builder may have encouraged Wiltshire Council to add to the already approved 1,250 houses, there is no known planning application that adds a further 500 houses here. 3. There is an outline permission for this quantum of development (S/2012/0814) but this proposal, supported by an Environmental Impact Assessment, was based on 1,250 dwellings as part of a balanced mixed-use development. Are we to assume all 8 ha of employment is to be housing developed at 30 dwellings per ha that means 30 x 8 = c. 240 houses? Where will the other 8 ha of land come from? 4. Neither Topic Papers 3 or 4 state how much more additional housing will be delivered at Fugglestone Red between 2017 2026 (!). 5. Using a robust delivery rate of 70 units per year (that is a lot to build in one location, plus releasing too much stock in one location onto the market too quickly will depress prices and so house builders will slow down on delivery if this starts to happen, or if the market dips. So, Persimmon Homes will probably on average deliver at 1,250 / 70 = 17.8 but say to be generous - a range of 13 18 years. The development began with houses being completed in c. 2015/6 leading to the inevitable conclusion Fugglestone Red might well deliver 1,250 houses between 2015 2028/33? We cannot see how more housing (c. 500 more houses?) could be delivered faster on the same large site before the end of the Plan period: 2025/6. 6. Even allowing a very optimistic delivery rate of say 100 houses pa = (1,250 + 500 dwellings extra to help cover for Churchfields) / 100 = 17.5 years that would be too slow a delivery to support the Councils claims of a sound approach to meeting housing need at Salisbury 2017 2026. Delivering 1,750 houses at Fugglestone Red will take more than 7 years 2018 2026. It would stretch from 2015 2032. 7. Netherhampton Road is also identified as a new source of housing land. But PC 31 explains that Netherhampton Road will not deliver any housing for several years . 8. Does this mean more than two years (no housing until 2020?), or more literally, seven or more years (2025)? We do not think it is possible to deliver affordable and market houses for sale at Netherhampton Road by 2020/1. 9. In our opinion, this site is too controversial and even if supported, quite complex and a real challenge to come on stream until 2023, at the earliest, even applying a completion rate of 40 then 70 dwellings per annum: in our opinion 40 (2023/4) + 70</p>				

	(2024/5)+ 70 (2025/6) might only be possible at best: 180 dwellings out of a planned 640 (less than 30% of the planned contribution before 2026). The Councils trajectory for Netherhampton Road is also not sound. 10. In the light of our other objections and comments on the Proposed Changes, we are suggesting there are real problems with delivering enough housing land at Salisbury at Fugglestone Red, Netherhampton Road, Rowbarrow etc. We consider Wiltshire Council is missing an opportunity to bring forward a sustainable housing development predominantly within the settlement boundary at Britford Park and Ride for 100 houses on Areas A D at build rates of 30 (2021/2) + 35 (2022/3) + 35 (2023/4) see Plan 0010.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5136600		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	376	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187775	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC 30				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[PLEASE SEE THE ATTACHED DOCUMENT FOR THE FULL REPRESENTATION] Objection to PCs 29 30 and 31: The dropping of Churchfields and the strategy for Salisbury in the context of Re-Promoting Brownfield land within the settlement boundary at Britford Park &amp; Ride and adjoining land, Salisbury [TABLE INSERT] Objections to PC 29, 30 and 31 on the basis that Wiltshire Council has not adopted sound or realistic build out rates and not allocated enough land 2017 2026 1. PCs 29 and 30 confirm the dropping of Churchfields that was to provide 1,100 dwellings between 2017 2026 from the draft Housing DPD. This is a major change. 2. In part, Fugglestone Red is being put forward as its replacement, but that site is already identified in the Wiltshire Core Strategy (2015) to provide 1,250 new homes and 8 hectares of employment land (to assist with decanting businesses from Churchfields during the 2020s). Whilst the house builder may have encouraged Wiltshire Council to add to the already approved 1,250 houses, there is no known planning application that adds a further 500 houses here. 3. There is an outline permission for this quantum of development (S/2012/0814) but this proposal, supported by an Environmental Impact Assessment, was based on 1,250 dwellings as part of a balanced mixed-use development. Are we to assume all 8 ha of employment is to be housing developed at 30 dwellings per ha that means 30 x 8 = c. 240 houses? Where will the other 8 ha of land come from? 4. Neither Topic Papers 3 or 4 state how much more additional housing will be delivered at Fugglestone Red between 2017 2026 (!). 5. Using a robust delivery rate of 70 units per year (that is a lot to build in one location, plus releasing too much stock in one location onto the market too quickly will depress prices and so house builders will slow down on delivery if this starts to happen, or if the market dips. So, Persimmon Homes will probably on average deliver at 1,250 / 70 = 17.8 but say to be generous - a range of 13 18 years. The development began with houses being completed in c. 2015/6 leading to the inevitable conclusion Fugglestone Red might well deliver 1,250 houses between 2015 2028/33? We cannot see how more housing (c. 500 more houses?) could be delivered faster on the same large site before the end of the Plan period: 2025/6. 6. Even allowing a very optimistic delivery rate of say 100 houses pa = (1,250 + 500 dwellings extra to help cover for Churchfields) / 100 = 17.5 years that would be too slow a delivery to support the Councils claims of a sound approach to meeting housing need at Salisbury 2017 2026. Delivering 1,750 houses at Fugglestone Red will take more than 7 years 2018 2026. It would stretch from 2015 2032. 7. Netherhampton Road is also identified as a new source of housing land. But PC 31 explains that Netherhampton Road will not deliver any housing for several years . 8. Does this mean more than two years (no housing until 2020?), or more literally, seven or more years (2025)? We do not think it is possible to deliver affordable and market houses for sale at Netherhampton Road by 2020/1. 9. In our opinion, this site is too controversial and even if supported, quite complex and a real challenge to come on stream until 2023, at the earliest, even applying a completion rate of 40 then 70 dwellings per annum: in our opinion 40 (2023/4) + 70</p>				

	(2024/5)+ 70 (2025/6) might only be possible at best: 180 dwellings out of a planned 640 (less than 30% of the planned contribution before 2026). The Councils trajectory for Netherhampton Road is also not sound. 10. In the light of our other objections and comments on the Proposed Changes, we are suggesting there are real problems with delivering enough housing land at Salisbury at Fugglestone Red, Netherhampton Road, Rowbarrow etc. We consider Wiltshire Council is missing an opportunity to bring forward a sustainable housing development predominantly within the settlement boundary at Britford Park and Ride for 100 houses on Areas A D at build rates of 30 (2021/2) + 35 (2022/3) + 35 (2023/4) see Plan 0010.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5136600		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	377	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187775	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC31				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[PLEASE SEE THE ATTACHED DOCUMENT FOR THE FULL REPRESENTATION] Objection to PCs 29 30 and 31: The dropping of Churchfields and the strategy for Salisbury in the context of Re-Promoting Brownfield land within the settlement boundary at Britford Park &amp; Ride and adjoining land, Salisbury [TABLE INSERT] Objections to PC 29, 30 and 31 on the basis that Wiltshire Council has not adopted sound or realistic build out rates and not allocated enough land 2017 2026 1. PCs 29 and 30 confirm the dropping of Churchfields that was to provide 1,100 dwellings between 2017 2026 from the draft Housing DPD. This is a major change. 2. In part, Fugglestone Red is being put forward as its replacement, but that site is already identified in the Wiltshire Core Strategy (2015) to provide 1,250 new homes and 8 hectares of employment land (to assist with decanting businesses from Churchfields during the 2020s). Whilst the house builder may have encouraged Wiltshire Council to add to the already approved 1,250 houses, there is no known planning application that adds a further 500 houses here. 3. There is an outline permission for this quantum of development (S/2012/0814) but this proposal, supported by an Environmental Impact Assessment, was based on 1,250 dwellings as part of a balanced mixed-use development. Are we to assume all 8 ha of employment is to be housing developed at 30 dwellings per ha that means 30 x 8 = c. 240 houses? Where will the other 8 ha of land come from? 4. Neither Topic Papers 3 or 4 state how much more additional housing will be delivered at Fugglestone Red between 2017 2026 (!). 5. Using a robust delivery rate of 70 units per year (that is a lot to build in one location, plus releasing too much stock in one location onto the market too quickly will depress prices and so house builders will slow down on delivery if this starts to happen, or if the market dips. So, Persimmon Homes will probably on average deliver at 1,250 / 70 = 17.8 but say to be generous - a range of 13 18 years. The development began with houses being completed in c. 2015/6 leading to the inevitable conclusion Fugglestone Red might well deliver 1,250 houses between 2015 2028/33? We cannot see how more housing (c. 500 more houses?) could be delivered faster on the same large site before the end of the Plan period: 2025/6. 6. Even allowing a very optimistic delivery rate of say 100 houses pa = (1,250 + 500 dwellings extra to help cover for Churchfields) / 100 = 17.5 years that would be too slow a delivery to support the Councils claims of a sound approach to meeting housing need at Salisbury 2017 2026. Delivering 1,750 houses at Fugglestone Red will take more than 7 years 2018 2026. It would stretch from 2015 2032. 7. Netherhampton Road is also identified as a new source of housing land. But PC 31 explains that Netherhampton Road will not deliver any housing for several years . 8. Does this mean more than two years (no housing until 2020?), or more literally, seven or more years (2025)? We do not think it is possible to deliver affordable and market houses for sale at Netherhampton Road by 2020/1. 9. In our opinion, this site is too controversial and even if supported, quite complex and a real challenge to come on stream until 2023, at the earliest, even applying a completion rate of 40 then 70 dwellings per annum: in our opinion 40 (2023/4) + 70</p>				

	(2024/5)+ 70 (2025/6) might only be possible at best: 180 dwellings out of a planned 640 (less than 30% of the planned contribution before 2026). The Councils trajectory for Netherhampton Road is also not sound. 10. In the light of our other objections and comments on the Proposed Changes, we are suggesting there are real problems with delivering enough housing land at Salisbury at Fugglestone Red, Netherhampton Road, Rowbarrow etc. We consider Wiltshire Council is missing an opportunity to bring forward a sustainable housing development predominantly within the settlement boundary at Britford Park and Ride for 100 houses on Areas A D at build rates of 30 (2021/2) + 35 (2022/3) + 35 (2023/4) see Plan 0010.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5136600		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	378	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187638	Director Benchmark Development Planning Ltd  <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC51				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR FULL REPRESENTATION] Objections to PC 51 and CATP 17: Trowbridge Community Topic Paper by Benchmark (Nov 18) We are objecting to PC 51 and Table 5.3 that states: [TABLE INSERT] We are concerned about CATP 17 (referred to in the 6th column) that runs to about 120 pages and includes many small proposed changes. Table G.11 on page 118 draws together the conclusion for Trowbridge. We are concerned (seriously) with the whole of CATP 17a because insufficient land has been proposed to be allocated at Trowbridge 2018 2026 (see our other objections). Indeed, CATP 17a encapsulates this problem as it seeks to tweak the supply at Trowbridge to identify more land (an increase from 880 to 1,050 houses). But it is still not enough. Therefore, Table 5.3 and G.11 and the work supporting it in CATP 17a , is not sound. This is Table G.11: [TABLE INSERT] 1. This Proposed Change raises several issues, the most important is the suggestion in Table G.11 that there are only 6 sites in the Trowbridge Area that are available, achievable and deliverable at Trowbridge. This is not sound. 2. All our representations (Nov 2018) promote Staverton Triangle because it is available, achievable and deliverable for at least 60 houses but NB we do not repeat those details again. 3. We are therefore promoting the following amendment to the whole of CATP 17a and PC 51 etc: [TABLE INSERT]				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>	5136512		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	No, the Proposed Change does not meet a previous objection		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes



<b>Comment ID:</b>	379	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187638	Director Benchmark Development Planning Ltd <b>Person ID:</b> 894742	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a)				
<b>Please give details of why you support or do not support the updates to the</b>	<b>[REFER TO ATTACHMENT FOR FULL REPRESENTATION]</b>				

<p><b>associated evidence documents.</b></p>	<p>Objections to PC 51 and CATP 17: Trowbridge Community Topic Paper by Benchmark (Nov '18)</p> <p>We are objecting to PC 51 and Table 5.3 that's states:</p> <p>[TABLE INSERT]</p> <p>We are concerned about CATP 17 (referred to in the 6th column) that runs to about 120 pages and includes many small proposed changes. Table G.11 on page 118 draws together the conclusion for Trowbridge. We are concerned (seriously) with the whole of CATP 17a because insufficient land has been proposed to be allocated at Trowbridge 2018 – 2026 (see our other objections). Indeed, CATP 17a encapsulates this problem as it seeks to 'tweak' the supply at Trowbridge to identify more land (an increase from 880 to 1,050 houses). But it is still not enough. Therefore, Table 5.3 and G.11 and the work supporting it in CATP 17a , is not sound. This is Table G.11:</p> <p>[TABLE INSERT]</p> <ol style="list-style-type: none"> <li>1. This Proposed Change raises several issues, the most important is the suggestion in Table G.11 that there are only 6 sites in the Trowbridge Area that are "available, achievable and deliverable at Trowbridge." This is not sound.</li> <li>2. All our representations (Nov 2018) promote Staverton Triangle because it is available, achievable and deliverable for at least 60 houses – but NB we do not repeat those details again.</li> <li>3. We are therefore promoting the following amendment to the whole of CATP 17a and PC 51 etc:</li> </ol> <p>[TABLE INSERT]</p>
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136512</p>
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>	

<b>proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	380	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187776	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Since moving to the village some 15 years ago the level of traffic using the B3098 through the village has increased incredibly, particularly over the past 5 years. To even consider building 2 further large developments which feed into the B3098 beggars belief. Has any consideration been given to the available capacity of Bratton school the need for which the 2 proposed developments will require to be raised beyond its current level?</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	381	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. There are areas of concern for both sites. Only small scale housing developments in large villages are allowed by National Policy and development at each site conflicts with the Wiltshire Core Strategy, which allows "developments fewer than 10 dwellings in a Large Village" Each Site exceeds the recorded "housing needs" of the village and will not increase employment opportunities within the village as required by Wiltshire Council's own Policy; Combined total of both sites would exceed the number of houses required in Wiltshire Council's own Policy. If Westbury Town developable commitments are considered there is already a surplus of 291 in the Area without these sites. Wiltshire Council have therefore already exceeded the allotted quota Each site is assessed as "modest" development, but the Council is using incorrect figures. They state that there are currently 819 houses in the village whereas there are actually only 506; The Council has made errors in the assessment of Bratton as a Large Village by counting 2 recreation fields, 1 children's play area and 1 sports pitch as facilities. The latest statistics for cars per household indicate 1.76 for rural locations which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in an hour. Each development will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide-open expanses of the hillside at this part of the Special Landscape Area; Existing Pedestrian and bicycle access to the centre of the village along Westbury road and its pavement and across Court lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic; Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers; Bicycle access to and from both sites would be hazardous and there is little opportunity for a bicycle lane on either side of the highway; The village is carrying out its Neighbourhood Plan which should set out the plans for the village, not this Plan; There is further loss of green space and agricultural land; Development of this size will add to the existing pressures on Bratton surgery.

**Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:**

**Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).**



<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	382	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187777	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I am writing to say that Crudwell no longer needs Ridgeway Farm as an allocation site for housing. We are only a small village with no facilities as such. Malmesbury is a big town with job opportunities, schools, shops and amenities. Crudwell is very close to the border with Gloucestershire and the towns of Cirencester, Tetbury and Kemble all of which have had or are building lots of new homes. South of Crudwell in Corsham and Hullavington more houses are being built. I am supporting the removal of the Ridgeway Farm site from the Wilts Housing Site Allocations Plan. PC92 is what is important. It is important that we are able to write our neighbourhood plan and decide if and where we want houses when the need is there rather than being dictated to by people who do not know our village.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	383	<b>Consultee</b> Principal Landscape and Planning Officer North Wessex Downs Area of Outstanding Natural Beauty	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1184289		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	SBR PC7				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The extension of the settlement boundary to the south along Aldbourne Road does not comply with the settlement boundary review methodology in that it includes land and buildings that are visually and physically separate from the village. A greenfield site which has continuously been refused development including a dismissed appeal has been included which would by definition make the site in principle acceptable for development as it would be within the settlement boundary. The site has been described by the Wiltshire Planning officer, AONB planning adviser ad Planning Inspectorate as being set out on a limb away from the village of Baydon in open countryside. The inclusion of the site would undermine the planning process and nation policy in particular, para 8, 11, 170 and 172 of the NPPF (July 2018).				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	384	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1127014		<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [H2.6]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Submission 9 th November 2018 by [NAME REDACTED] [ADDRESS REDACTED] To: The Government Inspector appointed to review WCs proposal to build at Southwick Court Fields Site 3565 Opening statement I, and most Trowbridge residents I have spoken to over the last 18 months (since I first became aware of the failed initial consultation by WC about housing development and boundary change proposals), understand that new housing needs to be provided in Trowbridge and throughout Wiltshire, as part of Wiltshire County Councils duty to the Government to aid the resolution of the housing crisis in the UK. However, I and many others in Trowbridge, have seen at first hand how WC, has failed to undertake an effective process of consultation and communication to fully engage the residents of Trowbridge and its Town Council (and surrounding parishes), in a way that would provide buy-in from the maximum number of stakeholders to produce the best plans for new build and the regeneration of the County Town that is so badly needed. I wish to present several key issues for your consideration as listed below. I trust you will be able to see through the fog of pretence by WC at providing consultation, information and informed decision making on their part, which I challenge as not being the case. In reality, there has been a lack of engagement and information, a lack of acknowledgement of objections raised and a complete lack of cognisance of alternative suggestions made by Trowbridge Town Council whose proposals I support. Key issues Poor quality second (re-run) consultation by WC denuding many residents a proper opportunity to research and respond with informed questions, support for schemes or objections against schemes. This was despite assurances to improve the consultation processes after a failed previous consultation. Limited and ineffective consultation by WCC has plagued this process affecting the ability of residents to voice their opinion or have the proper time to research the effects of the proposals and make reasonable representations. This is the most important planning proposal to affect Trowbridge and yet there has been almost no outward publicity by WCC except via their website of to residents who may have been able to attend weekday WCC Cabinet meetings. After protests at WCC Cabinet meetings in 2017 by the limited number of informed residents available to attend, it was agreed to re-run the consultation and for WCC to use the interim time to raise awareness and engage with all residents of the affected areas in Trowbridge, e.g. by letter, mass advertising and leaflet drop to the affected existing build. Unfortunately there was no change in the level of effort by WC to increase the awareness among the affected residents, either by post or other methods of PR and consequently the consultation was still with virtually the same small numbers of residents. Most of the additional residents who engaged belatedly in the process only found out by word of mouth, and many were only finding out about the consultation at the end of the process. Even now, many are still oblivious of the issues and how it is likely to affect their neighbourhood. At Cabinet meetings, Cabinet members including the Chair (Scott) and Member with responsibility for Planning (Sturgis) have repeatedly fobbed off</p>				

those who raised issues about the Trowbridge plans, without answering the questions or properly addressing the issues raised by those informed enough to make representation. I would stress that this is not a political attack as I would normally support their policies, but as a professional businessman of 40 years plus, if I treated my clients and customers in this way I wouldn't have any business. That lack of accountability and riding roughshod approach over ordinary citizens is appalling and shows local government at its worst. At the re-run consultation open days at County Hall (Summer 2017), the Council Planning Officers present deliberately obstructed residents in gaining access to information by providing inadequate pictorial examples (e.g. by providing poorly produced and inaccurate mapping of proposed sites) and refusing to answer questions about:-

- where the Southwick Court Fields development access routes would be
- how it would affect the integrity of the surrounding cul-de-sacs
- what the effect of concrete development would be on the flood plains
- how it would affect road congestion which is already very high in these areas
- what the environmental issues were and how they would be mitigated
- how it would affect animal habitat, including for Bechstein bats
- what justification there was to try to change a historic town border in place for over 300 years
- what tree preservation process would be followed to protect the (already protected by law) historic hedgerows from destruction
- what the effects of the loss of open space would have on the thousands of people that use these fields every year for recreational purposes (our field survey demonstrates 35,000 annual users)
- why there were plans to build on green belt when there were significant brown field sites that had laid dormant for years without WCC having an effective plan to develop (this being critical to the regeneration of Trowbridge - why they were going against their own planning policy and that of the Government to use green belt instead of brown field
- why the WC was being developer led rather than managing effectively the development plan (e.g. lack of WC control over West Ashton building development led to the builder falling way behind schedule increasing the pressure to build elsewhere to make up the shortfall)

They claimed that access routes and planning detail had not been discussed despite the fact that we received tree preservation order information concurrent to the consultation appertaining directly to the protection of the border of Sandringham Road and Balmoral Road with Southwick Court, showing a proposed 7m access point, demonstrating the subversive culture of the management of planning at WC. All these questions are still awaiting a satisfactory answer by WC and it is very frustrating that the subsequent questions raised at the WC cabinet meetings could not extract reasonable answers either. For example, at Cabinet meetings I attended in 2017/18 as a member of the public along with a few other residents, the member for Planning (Sturgis) whenever asked about Trowbridge issues and specifically about brown field sites being ignored, the WCs own policy being ignored and issues re Southwick Fields, continually and repeatedly referred to his experience with Chippenham avoiding answering the questions relating directly to Trowbridge. Evidence of this is available from the video tapes of the meetings and in the responses to questions at those Cabinet meetings and you will see that we were not being properly informed. I am still waiting for a written response to questions that I asked in writing as part of the second consultation that finished in September 2017. Other points re the failure of proper consultation:

- Lack of letters to residents whose properties are part of the existing build in roads adjacent to Southwick Fields explaining what was being proposed. (As an example of good communication I quoted at WC Cabinet meetings that I am a Governor at a local school and have been petitioning for a zebra crossing - this has led to Banas Council sending numerous letters of explanation and consultation to houses affected - a good example of a council acting with positive intent to keep but WC has sent nothing.)
- No answers or acknowledgements of my letter submitted as part of the second consultation has been received
- No acknowledgement or response to the points raised directly pertinent to proposed development in Trowbridge of Site 3565

In particular, I refer to WCC Cabinet documents (Wiltshire Housing Site Allocations Development Plan Document) made public at meeting of 3rd July 2018, where several local councils at different levels identified the same failure to communicate, e.g. page 225 (response 8&9 page 4 of 22 point 2.5) and statement by Warminster and Market Lavington. This is just one example showing how WC failed to communicate or even follow the right rules. Many other similar examples are included in these documents, including the opinions and alternative proposals by Trowbridge Town Council (pages 212 onwards), detailed at previous public TT Council meetings that Trowbridge residents attended and supported by those residents in very clear terms that the Cabinet could not have doubted, and yet they ignored without reasonable explanation. WC knew about these proposals but chose to hide behind their interpretation of the law rather than listen to the genuine concerns and alternative suggestions of the people of

	<p>Trowbridge. The irony of all this is that with a few relatively small changes to the plan, WC would have garnered full support for its proposals. Southwick Court Fields Site 3565 specific objections I refer your to my letter of 20 th September 2017 to WC Planning in relation to the consultation process on Southwick Court Fields Site 3565, a proposal which I object to. I am yet to have an answer to the points I raised. The key issues and objections I would wish you to consider are detailed in that letter, which is 27 pages long, none of which I have had a response to by WC. It includes photographs of flooding of our garden which is bordered by a Lambrok Stream Winterbourne which rises to full every winter. Each element is set out with an overview and then detailed points and any objections or alternative suggestions. A copy of this letter should be available from WC Spatial Planning as part of the overall submission to you, but in the event that it is not available, I would be happy to supply a copy. You will note the previous flooding experienced by properties adjacent to these fields which can only be worse from concreting over; the issues about potential destruction of integrity of the historic hedgerow; the need for avoidance of destruction of the integrity of existing cul-de-sacs and the detrimental affect on existing built form; the lack of suitable local road infrastructure to service the site; the loss of animal habitat and many other issues raised including the 35,000 people that use these fields every year (our own survey has established this and was explained at Cabinet which has chosen to ignore it). I urge you to consider all these issues more carefully than WC have, and believe that in doing so you will draw the conclusion, like all local residents have, that Site 3565 is not a suitable place to build 180 houses or more, that there are several other better options that can be used to reach the quotas of new housing required in Trowbridge, and that the desire of the residents of Trowbridge to ensure an improved and regenerated town centre can be realised at the same time. Housing built in the centre provides direct access to shops, promotes high street shopping commerciality (a government wish) which is failing currently in Trowbridge (as can be witnessed by the closure of shops in the high street). It would also give direct access to rail and bus transport which is especially important for low income families without other means of transport. Other points I ask you to also consider: - Written commitments as voted by Council to respect the current built form which are compromised by the 3565 proposals and option to merge them with current built form. - Proven historical value of the land (ref HIA published in March of this year) including the uninhabited sightlines across the fields to the historic Westbury White Horse. These views have been part of the Wiltshire landscape for over 1000 years. There is evidence that suggests King Alfred's army camped in these fields which are in plain sight of Bratton Escarpment. - Notified flood plain and significant surface water already on site and proposed mitigation on the upward slope in denial of gravity - Loss of division between Southwick and Trowbridge - Incorrect inclusion of site by WC in Trowbridge proposal when it is in fact in Southwick I would be willing to present to the Inspectorate if required. Yours sincerely [NAME REDACTED]</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5136581</p>		



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	385	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187779	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified	
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>No</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>No</p>

<b>Comment ID:</b>	386	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187763	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified	
<b>Identify Proposed Change Reference Number</b>	PC64				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	WC received a substantial number of objections to the original proposal insofar that the allocation on the Hilperton Gap should be dropped as it clashed with WC Core strategy, would disrupt the Bechstein bat migration route, remove green space and was opposed by the vast majority of residents. Instead WC received 3 objections from housing development organisation stating they could build more houses on that space, so WC have increased the proposed allocation. Last week the Hilperton Neighbourhood Development plan which calls for no development on the Hilperton Gap was passed in referendum by 942 votes to 92. This proposed allocation goes against the spirit of the Neighbourhood Plan and should be dropped.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>	5136593				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	387	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187792	Senior Planner Savills  <b>Person ID:</b> 1187789	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified	
<b>Identify Proposed Change Reference Number</b>	SBR PC45				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>REPRESENTATIONS TO THE SCHEDULE OF PROPOSED CHANGES - WILTSHIRE HOUSING SITE ALLOCATIONS PLAN [REDACTED]</p> <p>I am writing on behalf of my client, Westfields Ltd, to provide representations to the Schedule of Proposed Changes to the Wiltshire Housing Site Allocations Plan, published in September 2018. These representations are submitted specifically in relation to the residential dwelling at Fair View, Hindon Road, Dinton, SP3 5HW, and seek to object to proposed changes to the settlement boundary in Dinton. The site consists of a residential bungalow, with a large amount of residential amenity space surrounding the property in the form of a front, side and rear garden, an access drive, hard surfacing for parking, and outbuildings (shed, garages and greenhouse). It is noted that the proposed revisions to the Dinton settlement boundary, published in the Pre-Submission version of the emerging plan, sought to remove a portion of the site from the settlement boundary, locating the new boundary around the bungalow and a small part of the associated land only SEE ATTACHED MAP: As can be seen, the site (added in green to the above plan) has been divided by the new proposed settlement boundary (red) although this does not actually align with any physical features of the site which is all clearly associated with the bungalow. In the proposed changes to the Dinton Settlement Boundary, published in September 2018, it can be seen that a number of similar situations in the north of the settlement have been amended, adding residential gardens back in to the settlement boundary where they had previously been removed through the Pre-Submission Plan. The published Proposed Changes in Dinton (SBR PC 45) state that these amendments have occurred either to "include housing development within the settlement boundary" (changes F5, F4 and F3), or "to include the entirety of the residential gardens" because "this land is physically related to the settlement" (changes G5 and H5). Given that Fair View has a clearly defined boundary, which is formed of mature hedgerows or fencing, and is bounded by residential properties, we would like to request that the settlement boundary is amended in this location to include the entire site. This land is part of the residential garden of the property, and is physically related to the settlement, meaning there is no justification for its removal from the settlement boundary. I trust you have all the information required to make the requested amendment to the settlement boundary, however if you require any further information please do not hesitate to contact me.</p>			
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018)</b>			

<b>document this representation relates to:</b>		<b>or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	I did not submit any comments on the previous stage		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	388	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1122130	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 3: Omission sites in the Chippenham, Devizes, Malmesbury, Salisbury, Warminster and Westbury Community Areas - Prepared by Wiltshire Council and The Environment Partne				
<b>Please give details of why you support or do not support the updates to the</b>	<b>OBJECTIONS TO TWO DOCUMENTS:- (1) Stage 4a Part 3, and Stage 4a Part 2.Site landscape Assessments.</b>				



**associated evidence documents.**

**Site 738** is re-introduced and passes through Stages 3 and Stages 4A on to Stage 4B of the Site allocation process.

Its Stage 4 Landscape Assessment is set out in **Stage 4a Part 3** - and I object as set out below.

**Site 321 in Bratton** was assessed and its results are in **Stage 4a Part 2 Site Landscape Assessment, (Westbury Community Area, pages 65 to 67)** and I compare the two sites with objections.

**Part 3 - Site 738:**

**Element: Site Description:** Final line: To the immediate south and south west of the site it should also be stated that the "sloping ground" rises up to the road leading up to the White Horse, beyond which there is a very deep combe before the land rise to the Salisbury Plain itself.

**Landscape Character:** Evaluation of landscape character and surrounding area:

The B3098 Westbury Road is stated to "not appear to be a particularly busy road.." This is simply not correct. It is busy and traffic is increasing, for private cars, vans and HGVs. For large portions of the day in particular during rush hours, there is considerable amount of traffic of private vehicles passing at speed through the village. This is through-going traffic for commuting and delivering, from the Westbury direction to Pewsey, Devizes and Calne directions, including the A360 south towards Andover and the A303. Some traffic goes through the village along the B3098. Others are using Bratton as a through-cut from Warminster and Westbury to Devizes and Calne, entering Bratton to turn left/north down the narrow steep lane of Court Lane and then passing through the villages of Steeple Ashton and the narrow lanes of Great Hinton) likewise for traffic to Melksham but through Steeple Ashton only, and back to the A350, avoiding the slow queuing traffic on the A350 and any road work sites, especially avoiding the delays at the small Yarnbrook roundabout. High HGV lorries from the south coming north on the A360 are diverted off the A360 at Littleton Pannel/West Lavington because of a low bridge and many continue along the B3098 to Westbury rather than return to the A360 to pass through Devizes.

The result is that the road by Site 738 and Site 321 is not quiet and peaceful, and the blind steep junction from the B3098 to Court Lane is a problematic turning and a dangerous crossing place.

The western edge of the village does have a remote feel, but that is due to the large open exposed nature of the location with the vast landscape of Salisbury Plain above, the high steep escarpments and combes, with the village of Bratton perched on the escarpment. The south western corner of Salisbury Plain at this point is dramatic. The remoteness also comes from the historical perspective given weight by the Iron age fortifications and the White Horse and the feeling that time has stood still here for centuries. The scale of the area is large. The incline and road up to the Iron Age fortification above is approximately one kilometre.

As such housing on a scale of 20 -22 houses and/or 35-40 houses with a suburban scale and feel, garages, roads, and lighting is more inappropriate than just an extension outside the village settlement.

**Views. (page 22)** The visual prominence judgement for Ste 738 has been given as "Moderate-Low sensitivity". This is not correct, although from the west the view will be hidden to some extent by the large trees of the solitary house to the west. The ground of Site 738 is higher up and can be seen from further away than Site 321. Site 321 is judged as "Moderate - High" and surely Site 738 is harmed to a greater extent or at least the same extent as Site 321.

Again Site 738 is assessed for Public Accessibility as "Moderate-Low sensitivity" and again that the site is said to be of "moderate- low visual prominence" but this is not correct especially when considering its high position, that it is overlooked by the houses in Castle Road and that walkers up Castle Road will look down on the site. Site 321 is stated to be for Public Accessibility "High Sensitivity" and the visual prominence is given as "moderate-high". The locations are very close to each other on opposite sides of the road with Site 738 being on higher ground - surely the assessments for Site 738 should be the same as for Site 321 in not indeed a higher adverse score and judgement.

**Mitigation:**

The capacity to accommodate change is not "moderate - high" as assessed. This is because -

the views which are affected are important ones, in particular from above being the area of Salisbury plain and the long descent in to Bratton down Castle Road, from the area of the Special Landscape Area.

The proposed development is higher up the escarpment and so can be viewed from further away. This will be compounded at night with the additional street lighting on the side of Salisbury Plain. The White Horse and/or this point in Bratton can be viewed from as far as Brass Knocker Hill outside Bath to the North West, from Avon Road in Devizes, from Seend village and to further west than Frome.

The part of the escarpment of Salisbury Plain is very open and remote. It is the absence of hedgerows and trees here that makes it remarkable. The planting of additional trees and hedgerow planting to block the views is not the appropriate step to take to reduce the negative impact of the development.

**Impact:**

The magnitude of effect on landscape character is given as "Low adverse", one up from "negligible". This must be too low an assessment The magnitude of effect on views for site 321 is given as "medium adverse" whereas for Site 738 it is only "Low adverse".

**Mitigation Measures and capacity to accommodate change:**

	<p>For Site 738 this is given as "High" but this can not be correct. Landscape and visual effects should not be mitigated by planting of additional trees in an open area and such planting will be out of character. It may be essential for an estate of 20-22 houses but it must mean that the capacity measurement should be "Moderate-Low", if not "Moderate-High". The capacity for Site 321 to accommodate change is given as "Moderate - high" and this is for a site planted firmly in the main view of the whole landscape looking from the West and the White Horse itself - meaning that Site 738 should not be a better scale of measurement than this.</p> <p>The assessments need to take in to account the large numbers contemplated on both sites. Even 20-22 houses is a large development, especially once adding in pavements, parking and turning spaces, garages, roads, lighting and of course the two story houses. It will result in tightly knit development, forming a block, in a part of the village which is presently an empty field in a rural area.</p> <p>Although Site 738 has been rejected as an allocation site at a later stage this assessment stage remains vital in the process, especially if the Site 738 is later re-introduced a further time.</p>		
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	389	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187830	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC93				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. It is a crazy number of houses that are planned for Bratton. Yes there is a need for more housing but certainly not what is proposed here for a number of reasons. What is happening in Westbury must be taken into account since Bratton is part of the infrastructure supporting and supported by Westbury. A huge number of houses are being built in Westbury and as a consequence, roads, schools and medical services are under enormous pressure. The area simply cannot cope with even more residents. As one small example Westbury Rail Station is already having to expand its car park. Where will further cars park? The road through Bratton, is dangerous because of the volume of traffic on it, not to mention cyclists and horses. At the Westbury end the road is far too narrow, particularly from the cemetery until the mini roundabout by the Turkish barber in Westbury and, from Bratton towards Edington there is not even room for a pavement making walking through particularly dangerous. It gets increasingly dangerous through Edington and further, towards Market Lavington. The volume of traffic and the winding, undulating nature of the road make it particularly dangerous (and, of course, the many potholes!). How will it cope with the inevitable extra traffic? Court Lane is very dangerous with a particularly dangerous junction onto Westbury road and there is an increasing number of delivery trucks and lorries using it. How will people get to Trowbridge when all routes to Wiltshires major town are log jammed? The queues along the A350 are horrendous at rush hour even now and have not been helped by the vast housing estates that are continuing to expand on the outskirts of Westbury Bratton Post Office and shop is a valuable village resource particularly when the next nearest Post Office in Westbury is beyond the Westbury Station. It is already so cramped that it can be very uncomfortable in there. Additionally, there is nowhere to park except on the side of the road (thus exacerbating the dangers on the B3098 already mentioned). Bratton is lucky enough to have a doctors surgery and pharmacy in the village. It is one of the things that makes the village attractive and it is a wonderful service but very difficult even now to get a doctors appointment I was recently told six weeks. There is no way that it will be able to cope with the influx of residents 57 new houses would bring - I believe there is an additional proposed housing project in The Butts as well. I also believe that the Westbury White Horse Surgery is struggling to cope with the number of patients it has and if the little Bratton surgery becomes inundated, what will happen to those in dire need of medical attention? - our nearest hospital is the community hospital in Trowbridge The Bratton primary school is another issue as there will inevitably be an increase in the numbers of students, even on a conservative estimate with the possible addition two classes of students. a) Where will they be accommodated, b) Who will teach them and c) How will the school provide sporting facilities in a limited space? The disruption that will be caused as a result of the building works will be horrendous. The road will have to be dug up to lay sewage, water pipes, gas and electricity and phone lines. Given how much disruption we have already had to our phone services as BT tries to improve our service, what will happen when the service boxes have to take an even greater load? As to the actual housing that will be built far too many of the new houses label themselves executive. They are clearly not aimed at those in need of housing but at building apparently prestigious houses for those with the where-withal to pay for them. Couples who grew up in the area should be able to live in the area and not be forced out by the greed of builders. A couple of token cheaper houses for first time buyers is not enough and while I am not advocating the building of tiny modern boxes with no garden, as seems to be the case where affordable housing is often built, jamming as many houses as possible into the smallest footprint, it should be a consideration. We are pleased that we live

	<p>close to a main line to London and use it frequently it is, it seems, also our downfall because so many people want to live in this area for that reason. However, that does not justify endless estates to allow the commuters easy access. It seems to me that Wiltshire County Council would do well to look at using some of the brown sites around other areas that are more able to cope with the additional housing in terms of infrastructure and planners need to plan intelligently and with compassion, bearing in mind the impact on the quality of life of both current and future residents.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	390	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187835	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified	
<b>Identify Proposed Change Reference Number</b>	SBR PC42				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Having examined the proposed change SBR PC42 set out in the Schedule of Proposed Changes to the Wiltshire Housing Site Allocations Plan I have concluded that it is unsound because: It is not justified by (and is inconsistent with) Wiltshire Council's Settlement Boundary Review Methodology published in May 2018 It is based solely on the submissions of a single respondent (West Tisbury Parish Council) which were made without the benefit of consultation with local residents/landowners and which West Tisbury Parish Council now wishes to revise. It is not supported by the emerging Tisbury Neighbourhood Plan or any other evidence. Description of the land affected by SBR PC42 The land in question largely comprises: a field, a break of large conifers forming a boundary of a field on which sheep graze, and private allotments which face the break of conifers. I enclose a picture of the field taken while standing next to the break of conifers: [SEE ATTACHED PICTURE].</p> <p>Wiltshire Council's original assessment up to June 2017 When Wiltshire Council consulted in June 2017 on the Housing Site Allocations Plan it did not propose the settlement boundary change which it has now put forward. The Council properly applied its own policy "to exclude the curtilage of a property that relates more closely to the open countryside e.g. a field or a paddock or has the capacity to substantially extend the built form of the settlement in terms of scale and location." Consultation supporting the original assessment Neither West Tisbury nor Tisbury parish councils used their prerogative to review their settlement boundaries during the informal and Regulation 18 consultations which took place on the draft neighbourhood plan, as set out in the Regulation 18 Consultation Report and Statement of Early Community Engagement. The change at SBR PC42 Nevertheless, in early 2018 Wiltshire Council subsequently revised the settlement boundary at SBR PC42 in response to two representations received from West Tisbury Parish Council (Figures refs. A77, Comment IDs 143 and 375). Comment ID 143 refers to "rationalisation". Comment ID 375 follows a site visit by parish councillors and differs substantially in tone. Comment ID 143 accurately reflects the West Tisbury Parish Council minute authorising the representation. However, West Tisbury Parish Council has been unable, within 14 days of the request being made, to provide a copy of the minutes of the site visit authorising Comment ID 375. Lack of sufficient or appropriate consultation Although West Tisbury Parish Council felt it necessary to repeat and "strongly emphasise" its first representation by submitting Comment ID 375, it did not think its impact sufficiently important to consult residents and parishioners either through the opportunity presented by the formal draft neighbourhood plan consultation, nor direct with residents potentially affected. Local residents have been surprised that West Tisbury Parish Council should have, out of the blue, made these specific representations without consulting those affected. Lack of justification for SBR PC42 The only justification given by West Tisbury Parish Council was that of "rationalisation" so that "all the gardens should be included". That alone is insufficient justification for a settlement boundary change. It is inconsistent with Wiltshire Council's Settlement Boundary</p>			

	<p>Review Methodology (the Review Methodology). The "best practice" stated on tables 3.1 and 3.2 of the Review Methodology clearly exclude: Open space or allotments at the edge of settlements Large gardens, paddocks or orchards Based on this best practice, Wiltshire Council's policy set out in Table 5.1 of the Review Methodology clearly excludes: Curtilages of properties which have the capacity to extend the built form of the settlement. This includes large residential gardens. Recreational or amenity space at the edge of settlements which primarily relate to the countryside (in form or nature) Almost all the additional land included in SBR PC42 is comprised of a field, allotments or tree plantings which primarily relate to the surrounding countryside. My contention is that West Tisbury Parish Council decided to "tidy up" the settlement boundary with a nice, clean line. Wiltshire Council then accepted the representations made by West Tisbury Parish Council without properly questioning why it should depart from its own policy. Wiltshire Council then transformed West Tisbury Parish Council's "tidying up" into a more acceptable, "post rationalised" form of words at SBR PC42. This is not a sound way of conducting settlement boundary changes and does not pass the test of the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence. A sound settlement boundary change would include in the settlement the gardens of 86-89 Monmouth Road, but exclude the field adjoining 86 Monmouth Road, the allotments next to Stanley Cottage (Monmouth Road), the break of large conifers forming the field boundary and the land between it and the access track. Regulation 22 consultation Thanks to the examination commenced in August 2018 West Tisbury Parish Council re-examined this matter more fully at its meeting on 1 November 2018 with the benefit of more detailed information. I understand that as a result, West Tisbury Parish Council has decided to amend its representation to the effect that the settlement boundary should be retained at its existing location with the exception of the small gardens and their garages which directly adjoin Numbers 86 and 89 Monmouth Road. West Tisbury Parish Council resolved to respond to the current consultation accordingly. The orange line on the plan below shows the resulting boundary [SEE PLAN ATTACHED]. This has my support because it correctly excludes the private allotments, conifer field boundary and field which adjoin open countryside, as originally determined by Wiltshire Council in accordance with its policies.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	5146811		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the</b></p>	I did not submit any comments on the previous stage		



<p><b>Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	391	<b>Consultee</b> Asda Stores Ltd	<b>Agent</b>  <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 903164		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC37				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Introduction and Background This planning policy representation is submitted in relation to our site at London Road in Salisbury, edged red on the enclosed Site Location Plan at Appendix 1 . The representation is submitted on a straightforward matter in order to support the Local Planning Authority's decision to include the site within the Settlement Boundary for Salisbury as part of the Wiltshire Housing Site Allocations Plan. As the Local Planning Authority (LPA) correctly understands, the site benefits from two extant permissions for retail development that have been supported by the Local Planning Authority as follows: 1. Outline Permission Reference S/1994/0632 and Reserved Matters Approval Reference S/1998/0373 ('1990s permission'). These decisions authorised the construction of a bulky goods retail development measuring 8,361 sq. m, which was implemented through preliminary groundworks for an access and therefore remains extant. 2. Permission Reference 14/04756/FUL which includes full permission for a 6,030 sq. m Class A1 foodstore with petrol filling station. The permission was granted on 15 August 2017 ('2017 permission') and remains extant until 15 August 2020. There are also further permissions for the site that have now expired that demonstrate the support for the site to be developed. Against the background of the extant permissions, and the site description and characteristics set out below, the minor amendment to the boundary of the settlement to include the site is justified to reflect the how the site sits within the settlement of Salisbury. Site Description and Characteristics The site is a triangular-shaped parcel of land to the north east corner of Salisbury. The site is bound to the south / south east by London Road (A30) and to the north / north east by Pearce Way. The most eastern part of the site contains the implemented access for the 1990s permission set out above, which provides an access into the site from a roundabout with three further arms. Located to the north of the site is a large modern residential development, to the north east a Premier Inn and associated restaurant, south east of the site is a car showroom, with a health and fitness club and office development located to the south and located along London Road. West of the site are large residential areas of Bishopdown. An Aldi is located along London Road is located approximately 600m to the south west of the site. It is important to note the view of the LPA officers in granting the 2017 permission that they consider the site to be a brownfield site, owing to the implemented 1990s permission. Additionally, permission has been granted within the last 15 months for a large format supermarket. A copy of the Committee Report for the 2017 permission is included at Appendix 2 . The text confirming the Local Planning Authority's view that the site is considered to be a brownfield site is included at the second paragraph on Page 10 of the Report included at Appendix 2 . Support for the Settlement Boundary Amendment In the light of the above, it can be clearly seen that the site is surrounded by development on all sides the site is in effect an island surrounded by development. Accordingly, the area is located within what is characterised on the ground as the settlement for Salisbury. The current Settlement Boundary is therefore dated and in need of updating to reflect the current</p>			

	settlement area for Salisbury. We intend to deliver development on the above site and benefit from extant permissions for commercial floorspace that supports sustainable economic growth in Salisbury. The decision by the Local Planning Authority to amend the settlement boundary for Salisbury is therefore justified and reflects the developed areas of the City. We trust our comments will be taken into account and the Local Planning Authority's decision to amend the Settlement Boundary will be supported by the Secretary of State.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	392	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 457823	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [MERE]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[REFER TO ATTACHMENT FOR EMAIL CORRESPONDENCE SETTING OUT SUPPORT FOR THE WHSAP INsofar AS IT DOESN'T ALLOCATE SITES IN MERE]				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5136816				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	393	<b>Consultee</b> Woodlands (Mere) Ltd	<b>Agent</b> Senior Planner Savills	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 448866	<b>Person ID:</b> 1187789	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC36				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Woodlands (Mere) Ltd wish to fully support the amendments to the Mere settlement boundary. Please refer to the Savills covering letter for more information. REPRESENTATIONS TO THE SCHEDULE OF PROPOSED CHANGES - WILTSHIRE HOUSING SITE ALLOCATIONS PLAN BEAUMONT BUSINESS PARK, MERE I am writing on behalf of my client Woodlands (Mere) Ltd to make representations to the current consultation on the Schedule of Proposed Changes to the Wiltshire Housing Site Allocations Plan, which were published in September 2017. We support the inclusion of the Beaumont Business Park within the revised settlement boundary for Mere. The site was established between the 1960s and 1980s, and previously formed a small industrial park to the south of the settlement in conjunction with the former Hillbrush Factory, directly to the north of the site. The longstanding history of built development in this area therefore supports its inclusion within the formal settlement boundary for Mere. The former Hillbrush Factory received outline planning consent in March 2015 for the demolition of the existing factory buildings and the erection of 134 dwellings with associated infrastructure (Ref: 14/06780/OUT). This development has now commenced following Reserved Matters approval. Woodlands (Mere) Ltd are currently progressing a pre-application for residential development at the site. The buildings are no longer suitable for modern business or industrial uses, and the site layout, which was developed due to the previous use of chimney manufacturing, does not make efficient use of the land. In addition, the new residential development immediately adjacent to the site means a residential use at the site would be more appropriate. It is noted that Wiltshire Council currently have a Brownfield Land Register Part 1 which was published in 2017. In the Planning Update Newsletter, published by the Ministry of Housing Communities and Local Government (MHCLG) on 6 November 2018, the Government has reminded Local Planning Authorities of the requirement to update the register at least once per year. This would therefore be a suitable opportunity to include the site at Beaumont Business Park onto the register. In accordance with Wiltshire Councils requirement, the site is suitable, available and achievable for residential, as confirmed by the Strategic Housing and Employment Land Availability Assessment (SHELAA) from July 2017. In conclusion, given the previously developed nature of the site, the proposed changes to the Mere settlement boundary are fully supported. If you require any further information regarding the site or these representations please do not hesitate to contact me.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018)</b>		

<b>Regulation Assessment document this representation relates to:</b>		<b>or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	I did not submit any comments on the previous stage		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	394	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 906566	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Effective	
<b>Identify Proposed Change Reference Number</b>	SBR PC8				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I do not believe that the consultation material to be sound. The proposed change as stated in 12 EXAM. 01.09 Schedule of Proposed Changes (Sept 2018)_9of46_Ramsbury is to amend the pre-submission settlement boundary to include the properties to the south of Newton Road. This is based on the proposed action in Table 24.8 in WHSAP.11 WHSA Consultation Statement Regulation (1) (c) Appendices M P The proposed action is to: Include the properties to the south of Newton Road, on the east of the road adjacent to The Old Mill, Scholarads Lane, and their curtilages. The curtilage of the property to the east of Anvil cottage has been divided by the proposed change to the settlement boundary as shown in the pictures below. The proposed change to the settlement boundary should be changed to bring the whole curtilage within the settlement boundary as indicated by the dotted line. This point was noted in Comment ID: 351 in the Settlement Boundary Review Informal Consultation with Parish and Town Councils 28/7/14 to 22/9/14.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5137113				



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	395	<b>Consultee</b> Wadworth & Co Ltd	<b>Agent</b> <b>Person ID:</b> 1187838	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 448943		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>		SBR PC21			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>We make this representation on behalf of Wadworth and Co; the owners of a parcel of land that is now being shown as excluded from the proposed settlement boundary of Seend on the Settlement Boundary Review Proposed Changes plan labelled SBR PC21. The land is found on the western boundary of the village within map grid reference F8/G8. The land has been included within the proposed settlement boundary in the pre-submission documents and now according to Table 19.1, it is proposed that the land be excluded from within the proposed settlement boundary for Seend following Wiltshire Councillors and Town Parish / Town Councillor consultation. The explanation provided by Seend Parish according to the Report on consultation with Wiltshire Councillors and town and parish councils on the proposed changes to the Wiltshire Housing Site Allocations Plan 15 th May -11 th June 2018 is that the site on the western boundary at F8/G8 should be excluded from the settlement boundary as the site is more related to the open countryside, especially in relation to the expansive views it provides. The site in question is a former car park associated with the Bell Inn. The Bell has the benefit of planning permission for a change of use to a single C3 residential dwelling (Planning permission ref: 18/05648/FUL) and as a result, the land is now vacant and available. Whilst the land to the rear of the site is considered to be open countryside, the site itself; being a car park, comprises a large amount of hard standing and has an existing access which provides a direct link to Trowbridge Road (A361). Being associated with the former public house and due to the nature of the site, we consider the site to constitute previously developed land. As a brownfield site and potential windfall, the inclusion of the site within the proposed development boundary would help contribute towards the local housing requirements over the plan period. Paragraph 118(c) of the National Planning Policy Framework ( July 2018 NPPF) gives substantial weight to the use of suitable brownfield land within settlements for homes and other identified needs. Significantly and specifically, Paragraph 118(d) of the NPPF encourages the re-development of car parks (among other sites) if this would represent an effective use of under-utilized land. The inclusion of the site enables an element of flexibility in the housing delivery for Seend, a settlement identified as a large village in Policy CP15 of the Core Strategy (2015) and any future planning application could help to support and sustain its services and facilities. Respondents in the Seend Parish Housing Needs Survey (June 2016) were asked if there was a lack of suitable existing housing in the Parish to meet their needs, to which eighteen out of nineteen households answered yes. We see such brownfield sites as being critical to delivering homes, particularly in constrained settlements such as Seend. Therefore, we do not consider that the plan has been positively prepared should the proposed change be accepted. Subject to other material planning considerations (including those which the Parish Refer), the site could accommodate a small number of 2 3 bedroom homes; the housing size of which is sought by respondents according to the Parish Survey. By excluding the site from the settlement boundary, we consider</p>				

	that the proposed change would not accord with the NPPF and a specific connection can be drawn in this particular case. The site is physically and functionally related to a large rural settlement and consequently, the effectiveness of the plan is compromised as it would not set out to do what it is supposed to in its Strategic Objectives as it would not built resilient communities nor support appropriate development in rural areas to help maintain the vitality and viability of settlements and the countryside. The proposed change would conflict with the NPPFs promotion of sustainable development in rural areas where housing should be located to enhance or maintain the vitality of rural communities. On these grounds we argue that in order to make the plan sound, the land located on the western boundary of Seend (grid reference F8/G8) should continue to be included within the Seend settlement boundary as previously proposed and not excluded as shown in SBR PC21.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	I did not submit any comments on the previous stage		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	396	<b>Consultee</b> Chair Bishopstrow Village Meeting	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 709291		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC76				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Bishopstrow Village Meeting (Parish Council) met on 28 September 2018 and considered aspects of the Wiltshire Housing Site Allocation DPD, particularly those concerning proposed development at East of the Dene, Warminster (Housing Allocation H2.7). It noted that comments from Wiltshire Council (Conservation Officer) and Heritage England showed concern for the local area in terms of: Environment Landscape Heritage assets Impact on Bishopstrow Conservation Area The meeting further noted that the major impact on the development of the whole site was at its southern and eastern sections where the heritage assets of Bishopstrow House, The Cotes, Home Farm, listed walls and Bishopstrow Conservation Area are located. It was the meetings belief that a way of preserving the integrity of this part of the site would be to extend the boundary of the Bishopstrow Conservation Area as shown on the map below, where the extension is shown in red.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>	5137128				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	397	<b>Consultee</b> Landscape and Planning Advisor Cranborne Chase and West Wiltshire Downs AONB	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 556113		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC39				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Consultation on the draft Wiltshire Housing Site Allocations Plan Thank you for consulting the AONB on this draft Wiltshire Housing Site Allocations Plan. Having looked at the documents that relate to potential sites and boundaries associated with this AONB it seems the main matter for the AONB Partnership is to confirm its support for the settlement boundary at Coombe Bissett (SBR PC39). [SEE ATTACHED REPRESENTATION].				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5146815				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	398	<b>Consultee</b> Waddeton Park Ltd	<b>Agent</b> Director Savills	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1137560	<b>Person ID:</b> 1138525	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC72				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION AND APPENDIX] 1. Introduction 1.1 These representations have been prepared and submitted by Savills on behalf of Waddeton Park Ltd (Waddeton Park) in response to the Focussed Changes consultation, and further evidence base, on the draft Wiltshire Housing Site Allocation Plan (WHSAP). 1.2 Waddeton Park have previously submitted representations, dated September 2017, in support of the WHSAP, and in particular the allocation of Site H2.6 Southwick Court, Trowbridge to the Submission Plan consultation. Since this submission, further work undertaken by Waddeton Parks technical team, and discussions with Wiltshire Council and other consultees, in particular Historic England, have enabled further clarification to be provided in regard to the nature of the proposals for the allocation site, and the compilation of a detailed evidence base supporting them. This includes a full suite of ecology surveys, geotechnical assessment, flood risk and drainage assessment, geophysics, heritage impact assessment, landscape and visual assessment and transport assessment. This more detailed evidence base has informed the discussions since the September 2017 Consultation, and is referenced as appropriate below. 1.3 The September 2017 Consultation highlighted the substantive need for further housing allocations within Wiltshire, and in particular in Trowbridge, to respond to the adopted housing requirement as set out in the Wiltshire Core Strategy. It set out that there has been a demonstrable shortfall in housing delivery within Trowbridge over the plan period to date (from 2006) with this a particular concern given the towns role as the Principal Settlement in the North West Housing Market Area (HMA), and a key location for growth over the plan period. This has been reaffirmed in the updated evidence base, as set out in Section 2 below. 1.4 The submission of the WHSAP in July 2018 results in its Examination taking place within the transitory period of the National Planning Policy Framework (NPPF); which as per paragraph 214 (NPPF, 2018) means that the test of soundness for the purposes of this Examination remains those set out in paragraph 182 of the NPPF (2012): Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements; Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; Effective the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. 1.5 It is recognised as part two of Wiltshires development plan that elements of soundness were examined as part of the Core Strategy; for example the identification of the housing requirement, the spatial strategy, settlement hierarchy and disaggregation of the housing requirement to community areas and settlements. These are therefore also considered as appropriate within this representation. 2. Housing Need and Delivery: Approach of the WHSAP 2.1 The adopted Core Strategy requires the delivery of 24,740 dwellings within the North West</p>			



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2.2 The Topic Papers published as part of the evidence base supporting the September 2017 Consultation confirmed that there had been a persistent housing delivery issue within the North West HMA since the adoption of the Core Strategy, and also that there is a particular failure in regard to the delivery of housing within the town of Trowbridge itself: a major concern given the importance of the town in the adopted Spatial Strategy. The Addendum Topic Papers (dated July and September 2018) reconfirm this position, and raise further concerns in regard to the delivery of housing within Trowbridge to meet its adopted target.

2.3 The North West HMA has consistently been unable to demonstrate a five year housing land supply (5HLS) since adoption of the Core Strategy; with the supply fluctuating regularly. This has been emphasised by the reliance upon large strategic sites to meet the housing requirement, and the delay in a number of these coming forward in a timely manner. The shortfall for the North West HMA in delivery over the plan period to date is demonstrated by the simple analysis of the housing requirement versus completions (updated figures from Topic Paper 3 Addendum July 2018): [TABLE INSERT]

2.4 Over the first eleven years of the plan period, the North West HMA has a 582 unit shortfall. This is significant, both in respect to absolute housing delivery, but also as a result of the associated undersupply of affordable housing.

2.5 In terms of housing land supply moving forward, Addendum Topic Paper 4 (July 2018) confirms that, against the Councils current housing land supply assessment, the North West HMA will fail to demonstrate an adequate housing land supply (referenced by 5HLS) from 2024/25 (see Table 2.3). The updated 5HLS assessment published with this consultation, within the Addendum Topic Paper 4, has resulted in a decrease in the projected 5HLS over the remaining plan period from that published as part of the Submission Consultation in 2017: with a reduction of 0.72years supply for the current period (2017/18), and a decrease in projected 5HLS over the next six years.

2.6 In regard to the town of Trowbridge, it is identified as the Principal Settlement within the North West HMA, and as the key location for growth over the plan period. The adopted Core Strategy is based upon a vision predicated upon sustainable patterns of development focussing on the settlement hierarchy (IR, #16). Trowbridge is identified as a location to support the delivery of 6,810 dwellings over the plan period; which as identified by Core Policy 29 seeks to strengthen its role as the principal service centre, whilst delivering a balance of housing and employment opportunities in association with improved infrastructure.

2.7 The September 2017 Consultation recognised that there have been, and continue to be, issues with the delivery of the only Core Strategy strategic allocation within Trowbridge: Ashton Park, and it identified that the quantum of development initially anticipated to be delivered within the Core Strategy plan period of 2,600 dwellings by 2026; had fallen to 1,600 (#5.24, TP4 July 2017). However, the Schedule of Proposed Changes subject to this consultation confirms that this trajectory has fallen further, with only 1,350 dwellings now expected to be delivered on the strategic site before 2026 (PC26): a reduction of 250 units since the 2017 trajectory, and 1,250 units from the Core Strategies anticipated delivery.

2.8 Trowbridges housing land supply is identified below: [TABLE INSERT]

2.9 The WHSAP identifies allocations within Trowbridge, including Southwick Court, for 1,050 dwellings, and as such, there remains a shortfall in identified housing land supply for Trowbridge over the remaining nine years of the plan period. This is confirmed in Addendum Topic Paper 4 which sets out a shortfall of 19% against the Core Strategy target (Table 5.8): equating to 1,297 units. Against adopted Core Strategy Policy 43, this would equate to a shortfall of 390 affordable units in the town.

2.10 This shortfall is significant and, when considered against Trowbridges role as the Principal Settlement, emphasises the considerable importance of the draft allocations in delivering the needs of the town and the wider HMA .

2.11 It also provides context in regard to comments raised by interested parties about the availability of alternative sites within Trowbridge. As set out by the Council in their response (paragraph 21.72, Consultation Statement, July 2018) all known alternative sites have been assessed , and as such, whilst brownfield windfall opportunities may come forward over the remaining plan period, they will not meet the identified scale of the shortfall within Trowbridge, at 1,297 units, and will certainly not provide for the shortfall in addition to being alternative sites to the draft allocations.

3. Site Assessment: Southwick Court

3.1 The 2017 Representation made a number of detailed points in regard to the site assessment as contained in the Trowbridge Community Area Topic Paper June 2017 (Table G.9) and the Sustainability Appraisal (June 2017).

3.2 The September 2018 Updated Trowbridge Topic Paper makes a number of changes in regard to the site assessment notably in regard to heritage. Our response to

the heritage update is discussed in Section 4 below. 3.3 In addition, the updated Topic Paper confirms that the allocation site is no longer required to identify land for the provision of a primary school with an alternative site identified with Trowbridge (see p114 and 118). This is confirmed within the Schedule of Proposed Changes - PC53 and PC55. This clarification had been provided by the Council within recent discussions with Waddeton Park, and as such, an updated Concept Plan has been produced which now excludes the land previously identified for a primary school. The removal of the land for the primary school has also resulted in amendments to the open space provision, opportunities for ecological enhancements, and a change in the assessment of potential heritage impacts which are discussed further below and in Section 4. 3.4 The updated Concept Plan is attached at Appendix 1: which confirms the ability to deliver 180 dwellings on the western part of the allocation site; alongside substantive open space on the western and southern parts of the site. The Concept Plan also confirms the opportunities for connections (pedestrian/cycle) to the north, a new pedestrian crossing to Southwick Country Park, woodland planting, ecological corridors and the drainage proposals for the site. These are discussed further below. 3.5 It is noted that the comments received from interested parties have been published, as set out in the Consultation Statement (July 2018). In addition, Waddeton Park undertook a public engagement exercise in late 2017 where a number of queries were raised by interested parties these are essentially duplicated from those sent to the earlier Submission Plan consultation. Where appropriate, we respond to these additional matters raised below. 3.6 As above, in response to the suggested changes to draft Policy H2.6 in regard to heritage and drainage (PC72 and 73); these are considered separately in Sections 4 and 5 of this Representation. Accessibility 3.7 We support the conclusions of the Councils site assessment, which confirm that the site is sustainably located on the edge of the town, with the ability to connect with local services and facilities to the north. There are a range of facilities in the immediate locality, including a post office and convenience store (circa 600m), public houses (circa 240m and 620m) and Spitfire Retail Park which has a range of retail units (circa 800m). Grove Primary School is the nearest existing primary school to the site and is located approximately 500m to the north of the site on Hazel Grove. Southwick Church of England Primary School is located approximately 1.2km to the south of the site on Hollis Way. Steps Ahead Day Nursery is located in Trowbridge Retail Park, approximately 800m northeast of the site. 3.8 The Clarendon Academy is located 1km north of the site and is a mixed secondary school and sixth form. Wiltshire College, Trowbridge is located approximately 550m north of the site on College Road and provides a wide range of courses. 3.9 The White Horse Business Park and Meridian Business Park are located approximately 1.5km east of the site along A363 Bradley Road. In addition, Trowbridge Town Centre and Wiltshire College to the north of the site provide employment opportunities. Spitfire Retail Park and Trowbridge Retail Park to the east of the site also provide local employment opportunities. There are further employment opportunities throughout Trowbridge. 3.10 These are accessed to the north of the allocation site, and there are a number of opportunities for new and improved pedestrian and cycle links into the existing development to the north; as illustrated on the Concept Plan. 3.11 The vehicular access from the A361 is shown on the Concept Plan. The detailed access junction has been subject to pre-application advice from Wiltshire Highways, and a detailed design has been finalised for the future submission of a planning application on the allocation site. The access link will also deliver a 3m wide shared pedestrian/cycle link. 3.12 In addition, the emerging proposals include a new pedestrian link across the A361 connecting to Southwick Country Park, providing a key element of any future strategic green link, and responding to the draft Habitat Regulations Assessment (dHRA) which emphasises the role of this recreation facility. 3.13 There are a number of bus stops in the immediate vicinity, including Marston Road (circa 270m), the A371 (circa 540m) and A363 (circa 800m), which provide services for routes 60, X34, 94, 185, 67, 81, 87/87A, and 265. These provide a circular route serving Trowbridge (hourly), alongside half hourly services to Chippenham, Frome, Bath, Salisbury and Warminster, and locations along the route. A route within the site is also provided to access the existing bus stop on the A361, and the access proposals for the site will include appropriate footways to access these bus stops. The Transport Assessment has identified mitigation/enhancement opportunities; including the relocation and improvements (raised kerb and shelter) for the existing northbound bus stop, and a new southbound bus stop. 3.14 It is noted that a number of local residents have expressed concern with the potential for a vehicular access directly north into the existing urban area of Trowbridge. As per above, the site access is taken directly from the A361. An emergency vehicular access would be provided, through enabling a vehicular movement along one of the proposed

pedestrian/cycle links, but access will be appropriately controlled, and secured through the detailed planning application. 3.15 It is noted that as part of the current consultation that the Trowbridge Transport Strategy Refresh (May 2018) has been published. We welcome this update of the earlier 2012 study. The Refresh confirms that the study has a strategic role; considering existing transport-related issues within the town and wider strategic transport objectives alongside considering the potential impacts of the draft allocation sites on the local transport network. The Refresh doesn't indicate any significant transport concerns in regard to the town following the delivery of the draft allocations; notably with the without mitigation scenario not resulting in any junctions becoming over capacity, and with the combined allocations only anticipated to have a marginal impact on the network performance. 3.16 The Refresh identifies those schemes which contain either a direct or cumulative relationship with Cluster 3 (which contains the allocation site, plus the other two draft allocations (either side of the A361)); albeit it doesn't indicate that these are necessary to make the allocations acceptable with the objective of the Refresh to result in no negative impacts on residents (#3.2) as opposed to the NPPFs threshold of severe. Nevertheless, strategic transport improvements are supported, and contributions from developers can be secured through the Community Infrastructure Levy (CIL); which currently has a number of schemes listed from the earlier 2012 Trowbridge Transport Study listed on the Regulation 123. 3.17 The Refresh notes that future planning applications will be required to consider whether a direct contribution to any of the schemes would be appropriate. This can come forward through the future detailed planning application, supported by the Transport Assessment. However, we would note that the emerging proposals for the allocation site already include a number of the elements identified within the schemes identified within the Refresh: for example, the detailed planning application will be supported by a Travel Plan (ST01) and new and improved bus stops on the A361 (PT04). Biodiversity 3.18 A full suite of ecology surveys have been undertaken on the allocation site, including: Phase 1 Habitat Survey, bat activity and static detector surveys alongside systematic surveys for badgers, otters, great crested newts and water voles. In addition, a baseline lighting assessment has been undertaken. These surveys have confirmed that there are no ecological features or protected habitats which would preclude development of the allocation site. 3.19 The emerging ecological assessment for the proposals on the allocation site have confirmed that a combination of retention of key features, establishing green corridors, delivering a sensitive lighting regime, securing a Construction Environmental Management Plan and new habitat creation (including woodland creation, species rich grasslands and ponds) will ensure that the detailed application proposals can be delivered in accordance with local and national planning policy. These are shown on the Concept Plan (Appendix 1) where relevant, with the detail capable of being secured through a future planning consent. 3.20 The draft Habitats Regulations Assessment (dHRA June 2017) and Addendum (September 2018) consider the potential for effects, either individually or in-combination, on the Bath and Bradford-on-Avon SAC. The Addendum HRA continues to support the conclusions of the dHRA that the allocation site would not have likely significant effects on its own, or in-combination, subject to the inclusion of appropriate measures within detailed planning applications to address habitat loss/deterioration and recreational impacts. 3.21 The allocation site is outside of any recognised Core Areas (which are defined in the Wiltshire Councils guidance note on planning applications and the SAC), but recent evidence shows there is a possibility of it being used by Bechsteins bats. A tree roost has recently been discovered on the northern edge of Southwick Country Park, and the bats are likely to forage and commute through the landscape around their roosts. Waddeton Park have undertaken a full season of bat surveys, carried out between April and October, which provide a more detailed evidence base than that supporting the dHRA and associated Addendum. 3.22 The surveys did not detect Myotis bats in large quantities (relative to the other bat species that were recorded), but it is possible that some of these recordings were of Bechsteins bats given the difficulties in distinguishing the species within surveys. As might be expected, the vast majority of activity was recorded along field boundaries, with relatively little activity recorded over the open fields. Where there was activity over open fields it was mostly of the larger bat species (noctules and serotines). There are several mature trees with potential roosting features, but no tree roosts were recorded. The habitats within and around the allocation site that are potentially important for SAC bats include streams and hedges around field boundaries, mature trees with roosting potential, the moat and buildings within the Southwick Court complex, and Axe and Cleaver Lane on the eastern boundary. 3.23 The field boundaries are largely tall hedgerows with mature trees, which provide high quality foraging and commuting habitat for bats. A lighting survey of the allocation site showed

that there is little light pollution, except in locations along the sites northern boundary where it adjoins the existing adjacent development and a streetlit road. The open fields are species-poor and agriculturally improved, but the fact that they are grazed by cattle enhances their quality for foraging bats. 3.24 In accordance with the design principles set out in the dHRA, the Concept Plan includes the provision of dark, landscaped buffers along the retained hedgerows, stream and field boundaries. These are 10-16 m wide and cover all of the important features identified through field surveys. Where the main access road passes through hedgerows, it has been sited to minimise habitat loss and a detailed lighting strategy brought forward through a future planning application would avoid illumination at relevant sensitive points by street lights. 3.25 In addition to the landscaped buffers, the emerging development design offers large areas of habitat creation in the west (the area of which has increased as a result of the removal of the school) and south of the site to benefit bats and other wildlife. This area includes provision for woodland planting, open grassland and ponds. This accords with the principles of the emerging Addendum HRA, which sets out that habitat offsetting, in accordance with the emerging Trowbridge Bat Mitigation Strategy, should be delivered within the allocation sites themselves (paragraph 3.3.6). The availability of 12ha of open space within the allocation site provides significant opportunities to deliver a range of enhanced and new habitats to offset any impacts on habitat loss/deterioration; and the detailed planning application will set out the precise nature of these habitats, in addition to their long-term maintenance, in accordance with the emerging Trowbridge Bat Mitigation Strategy. 3.26 The emerging proposals include significant areas of green recreational space, above the adopted policy standards. This ensures that the allocation site provides additional opportunities to support recreational activities. The Concept Plan confirms the opportunities to link with existing PROWs and informal recreation routes within the locality, and confirms the provision of a new pedestrian link across the A361, providing a direct link into Southwick Country Park. As confirmed in the dHRA, these measures represents a key objective in directing recreational pressure to Southwick Country Park, with the proposals on the allocation site providing an opportunity to deliver a number of the elements identified as opportunities for improvement within Figure 6 of the dHRA. 3.27 The draft allocation policy by virtue of the site area and development quantum, provides appropriate opportunities to deliver green links, new and enhanced habitats for bat foraging, and significant recreational open space in accordance with the requirements set out for the dHRA and its Addendum. There is no indication that future development on the allocation site would be unacceptable on ecological grounds. Landscape 3.28 The 2017 Representation submitted a detailed landscape commentary in response to the Councils evidence base, and this representation does not repeat those comments. The emerging proposals for the allocation site are supported by a full Landscape and Visual Impact Assessment (LVIA). The LVIA provides a robust and detailed assessment of the allocation site to a level of detail which will enable a decision to be taken on the planning application. As such, it provides a greater degree of clarity on the assessment of potential harm and the opportunities for mitigation than the allocation policy alone. 3.29 Our previous representation identified a number of concerns in response to the Councils Site Landscape Assessment for example, it fails to reference the more recent landscape analysis, West Wiltshire Landscape Character Assessment (March 2007); referencing the County-wide 2005 assessment only. The 2007 Assessment provides a more site specific appraisal of the existing baseline contribution that the site makes to the local character, and in association with this, the influence that the existing built form of Trowbridges urban area has on the character of the site, and thus the impact of development. It is also noted that the viewpoint locations shown on the map included within the Site Landscape Assessment are incorrect. 3.30 The full LVIA has identified a significant number of opportunities for landscape mitigation; including enhancement of existing landscape features, such as the northern landscape corridor, a substantial new landscape corridor along the southern and eastern edges of the proposed housing area, retention of the open nature of the western side of the allocation site, and creation of a network of pedestrian links throughout the site contained within the green infrastructure. These are illustrated on the Concept Plan. 3.31 The Councils assessment has not taken into account the potential for mitigation measures to be incorporated into future proposals on the allocation site, and therefore overstates the potential landscape impacts of developing on the allocation site. In contrast to the Councils assessment, the emerging LVIA concludes that the emerging proposals would not give rise to any unacceptable landscape or visual impacts and that, subject to the incorporation of the proposed mitigation measures, there is no landscape or visual justification as to why the proposed allocation of the site is unsound. 4. Heritage: Change Reference:

PC72 4.1 We support the changes made to Policy H2.6 in regard to heritage. Since the September 2017 Consultation, discussions between Waddeton Park, Historic England and Wiltshire Council have progressed in regard to the nature of the proposals on the site comprising discussions as to what elements the allocation policy is required to address, and what elements would be determined through the future planning application. 4.2 These discussions have been informed by a full Heritage Impact Assessment (HIA) undertaken by Cotswold Archaeology. This has been drafted to a planning application level of detail, and is informed by a field survey, LIDAR, geophysics and a detailed desk-based heritage assessment in accordance with the Chartered Institute of Archaeologists Guidelines. The discussions have also been informed by a joint site visit undertaken by Waddeton Parks heritage consultant and representatives from Historic England. 4.3 The work undertaken by Cotswold Archaeology, and shared with the Council and Historic England, supersedes the LUC Wiltshire Housing Site Allocations Plan: Heritage Impact Assessment (dated March 2018). It is based upon a more detailed assessment, including detailed research, analysis and field survey, and accords with the Institute Guidelines. The LUC Assessment does not; and as it sets out itself, is based upon a strategic high-level review of sites based upon secondary material (section 1.11) and the maximum case development scenario (section 1.13). The Cotswold Archaeology assessment meets the requirements of the proposed amendment to Policy H2.6; and as such, provides the certainty now at the allocation stage, that the impacts of the emerging proposals on designated and undesignated heritage assets are acceptable; and as agreed with Historic England, less than substantial. Remnant Water Meadows 4.4 In terms of the non-designated heritage asset, the former water meadows, the Cotswold Archaeology HIA has confirmed that the LUCs assessment of the extent of this feature, and its importance are incorrect. The LUC study was based upon a high level assessment of contemporary aerial photography and LiDAR. The Cotswold Archaeology HIA is based upon a geophysical survey and a site visit. This confirms that there are no former water meadows in the eastern part of the allocation site (noting that a site visit would have confirmed this given the topography of the eastern side). This is a factual error in the LUC study. 4.5 The assessment of potential impacts on the remnant water meadows is incorrect. It is erroneously based upon the extent of the remnant earthworks being the entire allocation site which as set out above is not correct. The remnant features have little value beyond their physicality, which has been substantially eroded. If the definition of setting the surroundings in which a heritage asset is experienced is applied, then given the limited remnants and the fact that the earthworks are basically not experienced as they are so eroded, their setting must be commensurately limited. 4.6 It also assumes development across the entire allocation site which as per the wording of draft Policy H2.6, and the emerging Concept Plan, is not correct. The draft allocation policy precludes development on the western side, therefore preserving the assets, and there will be limited disturbance of the system (for access), which will be sensitively designed. This is more than appropriate design for a feature of low heritage importance. Southwick Court 4.7 The LUC Study is a high-level assessment based upon limited information and analysis; it fails to accord with Historic England's The Setting of Heritage Assets (GPA3). A full consideration of the setting is not given: a single aspect is taken, and greatly over emphasised. The assessment fails to consider the visibility of the listed asset, its insular nature, the lack of a designed setting and the impact of the post-war housing in the assessment. The risk of harm is again based upon development of the whole of the allocation site, and the loss of the erroneously identified eastern water meadows. 4.8 The subsequent discussions with the Council and Historic England, and the emerging proposals for the site, have been informed by the full HIA undertaken by Cotswold Archaeology. 4.9 This confirmed that the key setting of the listed buildings comprises their location within the historic moated enclosure, which is very insular in its setting with very limited views of the historic buildings from beyond. The main frontage of the house faces to the south-east, across its garden and away from the allocation site. The key setting of the listed buildings will not be harmed by development as set out in the Concept Plan. 4.10 In respect to the wider setting, the farmhouse was not designed within a parkland setting (its location is due to the former medieval moated manor), and its current agricultural setting is heavily influenced by the post-war development at Trowbridge and Southwick. Retaining the western part of the site open and free from development enables an open parkland setting to be maintained across the entire western part of the allocation site, and the delivery of a sensitively design access road through the detailed planning application (in terms of scale, material, landscaping and lighting) will ensure that effects of the western part of the allocation site on the designated assets are minimised. As shown on the Concept Plan, a new landscaped edge will be created on the

	<p>eastern part of the allocation site. 4.11 There is sufficient clarity to conclude that the allocation site can be delivered without unacceptable impacts on the identified heritage assets (in respect to the non-development of the western side, the sensitively designed access road and requirement for a full Heritage Impact Assessment), and that, through detailed design at the planning application stage, appropriate mitigation measures (both inherent and additional) can be secured which minimise the impact of the emerging proposals on the assets. It is agreed (with the benefit of the detailed HIA and emerging Concept Plan) that this harm would fall within the less than substantial harm as defined by paragraph 196 of the National Planning Policy Framework (NPPF), and as confirmed in Section 2 above, there is a clear and pressing need for additional housing within Trowbridge. Heritage Conclusions 4.12 The outcome of these discussions has informed the Concept Plan which is appended in Appendix 1, and also the proposed modifications set out in PC72. 4.13 As part of these discussions, it has been confirmed that a sensitively design rural access road will be required on the western side of the allocation site; with associated low level lighting, landscaping and minimal street signage. The exact details of this can be agreed through the future planning application, however, as per discussions with Historic England, we would support the inclu</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	399	<b>Consultee</b> Waddeton Park Ltd	<b>Agent</b> Director Savills	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1137560	<b>Person ID:</b> 1138525	<b>Do you consider the Proposed Change to be sound?</b>	
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2.3 The North West HMA has consistently been unable to demonstrate a five year housing land supply (5HLS) since adoption of the Core Strategy; with the supply fluctuating regularly. This has been emphasised by the reliance upon large strategic sites to meet the housing requirement, and the delay in a number of these coming forward in a timely manner. The shortfall for the North West HMA in delivery over the plan period to date is demonstrated by the simple analysis of the housing requirement versus completions (updated figures from Topic Paper 3 Addendum July 2018): [TABLE INSERT]

2.4 Over the first eleven years of the plan period, the North West HMA has a 582 unit shortfall. This is significant, both in respect to absolute housing delivery, but also as a result of the associated undersupply of affordable housing.

2.5 In terms of housing land supply moving forward, Addendum Topic Paper 4 (July 2018) confirms that, against the Councils current housing land supply assessment, the North West HMA will fail to demonstrate an adequate housing land supply (referenced by 5HLS) from 2024/25 (see Table 2.3). The updated 5HLS assessment published with this consultation, within the Addendum Topic Paper 4, has resulted in a decrease in the projected 5HLS over the remaining plan period from that published as part of the Submission Consultation in 2017: with a reduction of 0.72years supply for the current period (2017/18), and a decrease in projected 5HLS over the next six years.

2.6 In regard to the town of Trowbridge, it is identified as the Principal Settlement within the North West HMA, and as the key location for growth over the plan period. The adopted Core Strategy is based upon a vision predicated upon sustainable patterns of development focussing on the settlement hierarchy (IR, #16). Trowbridge is identified as a location to support the delivery of 6,810 dwellings over the plan period; which as identified by Core Policy 29 seeks to strengthen its role as the principal service centre, whilst delivering a balance of housing and employment opportunities in association with improved infrastructure.

2.7 The September 2017 Consultation recognised that there have been, and continue to be, issues with the delivery of the only Core Strategy strategic allocation within Trowbridge: Ashton Park, and it identified that the quantum of development initially anticipated to be delivered within the Core Strategy plan period of 2,600 dwellings by 2026; had fallen to 1,600 (#5.24, TP4 July 2017). However, the Schedule of Proposed Changes subject to this consultation confirms that this trajectory has fallen further, with only 1,350 dwellings now expected to be delivered on the strategic site before 2026 (PC26): a reduction of 250 units since the 2017 trajectory, and 1,250 units from the Core Strategies anticipated delivery.

2.8 Trowbridges housing land supply is identified below: [TABLE INSERT]

2.9 The WHSAP identifies allocations within Trowbridge, including Southwick Court, for 1,050 dwellings, and as such, there remains a shortfall in identified housing land supply for Trowbridge over the remaining nine years of the plan period. This is confirmed in Addendum Topic Paper 4 which sets out a shortfall of 19% against the Core Strategy target (Table 5.8): equating to 1,297 units. Against adopted Core Strategy Policy 43, this would equate to a shortfall of 390 affordable units in the town.

2.10 This shortfall is significant and, when considered against Trowbridges role as the Principal Settlement, emphasises the considerable importance of the draft allocations in delivering the needs of the town and the wider HMA .

2.11 It also provides context in regard to comments raised by interested parties about the availability of alternative sites within Trowbridge. As set out by the Council in their response (paragraph 21.72, Consultation Statement, July 2018) all known alternative sites have been assessed , and as such, whilst brownfield windfall opportunities may come forward over the remaining plan period, they will not meet the identified scale of the shortfall within Trowbridge, at 1,297 units, and will certainly not provide for the shortfall in addition to being alternative sites to the draft allocations.

3. Site Assessment: Southwick Court

3.1 The 2017 Representation made a number of detailed points in regard to the site assessment as contained in the Trowbridge Community Area Topic Paper June 2017 (Table G.9) and the Sustainability Appraisal (June 2017).

3.2 The September 2018 Updated Trowbridge Topic Paper makes a number of changes in regard to the site assessment notably in regard to heritage. Our response to

the heritage update is discussed in Section 4 below. 3.3 In addition, the updated Topic Paper confirms that the allocation site is no longer required to identify land for the provision of a primary school with an alternative site identified with Trowbridge (see p114 and 118). This is confirmed within the Schedule of Proposed Changes - PC53 and PC55. This clarification had been provided by the Council within recent discussions with Waddeton Park, and as such, an updated Concept Plan has been produced which now excludes the land previously identified for a primary school. The removal of the land for the primary school has also resulted in amendments to the open space provision, opportunities for ecological enhancements, and a change in the assessment of potential heritage impacts which are discussed further below and in Section 4. 3.4 The updated Concept Plan is attached at Appendix 1: which confirms the ability to deliver 180 dwellings on the western part of the allocation site; alongside substantive open space on the western and southern parts of the site. The Concept Plan also confirms the opportunities for connections (pedestrian/cycle) to the north, a new pedestrian crossing to Southwick Country Park, woodland planting, ecological corridors and the drainage proposals for the site. These are discussed further below. 3.5 It is noted that the comments received from interested parties have been published, as set out in the Consultation Statement (July 2018). In addition, Waddeton Park undertook a public engagement exercise in late 2017 where a number of queries were raised by interested parties these are essentially duplicated from those sent to the earlier Submission Plan consultation. Where appropriate, we respond to these additional matters raised below. 3.6 As above, in response to the suggested changes to draft Policy H2.6 in regard to heritage and drainage (PC72 and 73); these are considered separately in Sections 4 and 5 of this Representation. Accessibility 3.7 We support the conclusions of the Councils site assessment, which confirm that the site is sustainably located on the edge of the town, with the ability to connect with local services and facilities to the north. There are a range of facilities in the immediate locality, including a post office and convenience store (circa 600m), public houses (circa 240m and 620m) and Spitfire Retail Park which has a range of retail units (circa 800m). Grove Primary School is the nearest existing primary school to the site and is located approximately 500m to the north of the site on Hazel Grove. Southwick Church of England Primary School is located approximately 1.2km to the south of the site on Hollis Way. Steps Ahead Day Nursery is located in Trowbridge Retail Park, approximately 800m northeast of the site. 3.8 The Clarendon Academy is located 1km north of the site and is a mixed secondary school and sixth form. Wiltshire College, Trowbridge is located approximately 550m north of the site on College Road and provides a wide range of courses. 3.9 The White Horse Business Park and Meridian Business Park are located approximately 1.5km east of the site along A363 Bradley Road. In addition, Trowbridge Town Centre and Wiltshire College to the north of the site provide employment opportunities. Spitfire Retail Park and Trowbridge Retail Park to the east of the site also provide local employment opportunities. There are further employment opportunities throughout Trowbridge. 3.10 These are accessed to the north of the allocation site, and there are a number of opportunities for new and improved pedestrian and cycle links into the existing development to the north; as illustrated on the Concept Plan. 3.11 The vehicular access from the A361 is shown on the Concept Plan. The detailed access junction has been subject to pre-application advice from Wiltshire Highways, and a detailed design has been finalised for the future submission of a planning application on the allocation site. The access link will also deliver a 3m wide shared pedestrian/cycle link. 3.12 In addition, the emerging proposals include a new pedestrian link across the A361 connecting to Southwick Country Park, providing a key element of any future strategic green link, and responding to the draft Habitat Regulations Assessment (dHRA) which emphasises the role of this recreation facility. 3.13 There are a number of bus stops in the immediate vicinity, including Marston Road (circa 270m), the A371 (circa 540m) and A363 (circa 800m), which provide services for routes 60, X34, 94, 185, 67, 81, 87/87A, and 265. These provide a circular route serving Trowbridge (hourly), alongside half hourly services to Chippenham, Frome, Bath, Salisbury and Warminster, and locations along the route. A route within the site is also provided to access the existing bus stop on the A361, and the access proposals for the site will include appropriate footways to access these bus stops. The Transport Assessment has identified mitigation/enhancement opportunities; including the relocation and improvements (raised kerb and shelter) for the existing northbound bus stop, and a new southbound bus stop. 3.14 It is noted that a number of local residents have expressed concern with the potential for a vehicular access directly north into the existing urban area of Trowbridge. As per above, the site access is taken directly from the A361. An emergency vehicular access would be provided, through enabling a vehicular movement along one of the proposed

pedestrian/cycle links, but access will be appropriately controlled, and secured through the detailed planning application. 3.15 It is noted that as part of the current consultation that the Trowbridge Transport Strategy Refresh (May 2018) has been published. We welcome this update of the earlier 2012 study. The Refresh confirms that the study has a strategic role; considering existing transport-related issues within the town and wider strategic transport objectives alongside considering the potential impacts of the draft allocation sites on the local transport network. The Refresh doesn't indicate any significant transport concerns in regard to the town following the delivery of the draft allocations; notably with the without mitigation scenario not resulting in any junctions becoming over capacity, and with the combined allocations only anticipated to have a marginal impact on the network performance. 3.16 The Refresh identifies those schemes which contain either a direct or cumulative relationship with Cluster 3 (which contains the allocation site, plus the other two draft allocations (either side of the A361)); albeit it doesn't indicate that these are necessary to make the allocations acceptable with the objective of the Refresh to result in no negative impacts on residents (#3.2) as opposed to the NPPFs threshold of severe. Nevertheless, strategic transport improvements are supported, and contributions from developers can be secured through the Community Infrastructure Levy (CIL); which currently has a number of schemes listed from the earlier 2012 Trowbridge Transport Study listed on the Regulation 123. 3.17 The Refresh notes that future planning applications will be required to consider whether a direct contribution to any of the schemes would be appropriate. This can come forward through the future detailed planning application, supported by the Transport Assessment. However, we would note that the emerging proposals for the allocation site already include a number of the elements identified within the schemes identified within the Refresh: for example, the detailed planning application will be supported by a Travel Plan (ST01) and new and improved bus stops on the A361 (PT04). Biodiversity 3.18 A full suite of ecology surveys have been undertaken on the allocation site, including: Phase 1 Habitat Survey, bat activity and static detector surveys alongside systematic surveys for badgers, otters, great crested newts and water voles. In addition, a baseline lighting assessment has been undertaken. These surveys have confirmed that there are no ecological features or protected habitats which would preclude development of the allocation site. 3.19 The emerging ecological assessment for the proposals on the allocation site have confirmed that a combination of retention of key features, establishing green corridors, delivering a sensitive lighting regime, securing a Construction Environmental Management Plan and new habitat creation (including woodland creation, species rich grasslands and ponds) will ensure that the detailed application proposals can be delivered in accordance with local and national planning policy. These are shown on the Concept Plan (Appendix 1) where relevant, with the detail capable of being secured through a future planning consent. 3.20 The draft Habitats Regulations Assessment (dHRA June 2017) and Addendum (September 2018) consider the potential for effects, either individually or in-combination, on the Bath and Bradford-on-Avon SAC. The Addendum HRA continues to support the conclusions of the dHRA that the allocation site would not have likely significant effects on its own, or in-combination, subject to the inclusion of appropriate measures within detailed planning applications to address habitat loss/deterioration and recreational impacts. 3.21 The allocation site is outside of any recognised Core Areas (which are defined in the Wiltshire Councils guidance note on planning applications and the SAC), but recent evidence shows there is a possibility of it being used by Bechsteins bats. A tree roost has recently been discovered on the northern edge of Southwick Country Park, and the bats are likely to forage and commute through the landscape around their roosts. Waddeton Park have undertaken a full season of bat surveys, carried out between April and October, which provide a more detailed evidence base than that supporting the dHRA and associated Addendum. 3.22 The surveys did not detect Myotis bats in large quantities (relative to the other bat species that were recorded), but it is possible that some of these recordings were of Bechsteins bats given the difficulties in distinguishing the species within surveys. As might be expected, the vast majority of activity was recorded along field boundaries, with relatively little activity recorded over the open fields. Where there was activity over open fields it was mostly of the larger bat species (noctules and serotines). There are several mature trees with potential roosting features, but no tree roosts were recorded. The habitats within and around the allocation site that are potentially important for SAC bats include streams and hedges around field boundaries, mature trees with roosting potential, the moat and buildings within the Southwick Court complex, and Axe and Cleaver Lane on the eastern boundary. 3.23 The field boundaries are largely tall hedgerows with mature trees, which provide high quality foraging and commuting habitat for bats. A lighting survey of the allocation site showed

that there is little light pollution, except in locations along the sites northern boundary where it adjoins the existing adjacent development and a streetlit road. The open fields are species-poor and agriculturally improved, but the fact that they are grazed by cattle enhances their quality for foraging bats. 3.24 In accordance with the design principles set out in the dHRA, the Concept Plan includes the provision of dark, landscaped buffers along the retained hedgerows, stream and field boundaries. These are 10-16 m wide and cover all of the important features identified through field surveys. Where the main access road passes through hedgerows, it has been sited to minimise habitat loss and a detailed lighting strategy brought forward through a future planning application would avoid illumination at relevant sensitive points by street lights. 3.25 In addition to the landscaped buffers, the emerging development design offers large areas of habitat creation in the west (the area of which has increased as a result of the removal of the school) and south of the site to benefit bats and other wildlife. This area includes provision for woodland planting, open grassland and ponds. This accords with the principles of the emerging Addendum HRA, which sets out that habitat offsetting, in accordance with the emerging Trowbridge Bat Mitigation Strategy, should be delivered within the allocation sites themselves (paragraph 3.3.6). The availability of 12ha of open space within the allocation site provides significant opportunities to deliver a range of enhanced and new habitats to offset any impacts on habitat loss/deterioration; and the detailed planning application will set out the precise nature of these habitats, in addition to their long-term maintenance, in accordance with the emerging Trowbridge Bat Mitigation Strategy. 3.26 The emerging proposals include significant areas of green recreational space, above the adopted policy standards. This ensures that the allocation site provides additional opportunities to support recreational activities. The Concept Plan confirms the opportunities to link with existing PROWs and informal recreation routes within the locality, and confirms the provision of a new pedestrian link across the A361, providing a direct link into Southwick Country Park. As confirmed in the dHRA, these measures represents a key objective in directing recreational pressure to Southwick Country Park, with the proposals on the allocation site providing an opportunity to deliver a number of the elements identified as opportunities for improvement within Figure 6 of the dHRA. 3.27 The draft allocation policy by virtue of the site area and development quantum, provides appropriate opportunities to deliver green links, new and enhanced habitats for bat foraging, and significant recreational open space in accordance with the requirements set out for the dHRA and its Addendum. There is no indication that future development on the allocation site would be unacceptable on ecological grounds. Landscape 3.28 The 2017 Representation submitted a detailed landscape commentary in response to the Councils evidence base, and this representation does not repeat those comments. The emerging proposals for the allocation site are supported by a full Landscape and Visual Impact Assessment (LVIA). The LVIA provides a robust and detailed assessment of the allocation site to a level of detail which will enable a decision to be taken on the planning application. As such, it provides a greater degree of clarity on the assessment of potential harm and the opportunities for mitigation than the allocation policy alone. 3.29 Our previous representation identified a number of concerns in response to the Councils Site Landscape Assessment for example, it fails to reference the more recent landscape analysis, West Wiltshire Landscape Character Assessment (March 2007); referencing the County-wide 2005 assessment only. The 2007 Assessment provides a more site specific appraisal of the existing baseline contribution that the site makes to the local character, and in association with this, the influence that the existing built form of Trowbridges urban area has on the character of the site, and thus the impact of development. It is also noted that the viewpoint locations shown on the map included within the Site Landscape Assessment are incorrect. 3.30 The full LVIA has identified a significant number of opportunities for landscape mitigation; including enhancement of existing landscape features, such as the northern landscape corridor, a substantial new landscape corridor along the southern and eastern edges of the proposed housing area, retention of the open nature of the western side of the allocation site, and creation of a network of pedestrian links throughout the site contained within the green infrastructure. These are illustrated on the Concept Plan. 3.31 The Councils assessment has not taken into account the potential for mitigation measures to be incorporated into future proposals on the allocation site, and therefore overstates the potential landscape impacts of developing on the allocation site. In contrast to the Councils assessment, the emerging LVIA concludes that the emerging proposals would not give rise to any unacceptable landscape or visual impacts and that, subject to the incorporation of the proposed mitigation measures, there is no landscape or visual justification as to why the proposed allocation of the site is unsound. 4. Heritage: Change Reference:

PC72 4.1 We support the changes made to Policy H2.6 in regard to heritage. Since the September 2017 Consultation, discussions between Waddeton Park, Historic England and Wiltshire Council have progressed in regard to the nature of the proposals on the site comprising discussions as to what elements the allocation policy is required to address, and what elements would be determined through the future planning application. 4.2 These discussions have been informed by a full Heritage Impact Assessment (HIA) undertaken by Cotswold Archaeology. This has been drafted to a planning application level of detail, and is informed by a field survey, LIDAR, geophysics and a detailed desk-based heritage assessment in accordance with the Chartered Institute of Archaeologists Guidelines. The discussions have also been informed by a joint site visit undertaken by Waddeton Parks heritage consultant and representatives from Historic England. 4.3 The work undertaken by Cotswold Archaeology, and shared with the Council and Historic England, supersedes the LUC Wiltshire Housing Site Allocations Plan: Heritage Impact Assessment (dated March 2018). It is based upon a more detailed assessment, including detailed research, analysis and field survey, and accords with the Institute Guidelines. The LUC Assessment does not; and as it sets out itself, is based upon a strategic high-level review of sites based upon secondary material (section 1.11) and the maximum case development scenario (section 1.13). The Cotswold Archaeology assessment meets the requirements of the proposed amendment to Policy H2.6; and as such, provides the certainty now at the allocation stage, that the impacts of the emerging proposals on designated and undesignated heritage assets are acceptable; and as agreed with Historic England, less than substantial. Remnant Water Meadows 4.4 In terms of the non-designated heritage asset, the former water meadows, the Cotswold Archaeology HIA has confirmed that the LUCs assessment of the extent of this feature, and its importance are incorrect. The LUC study was based upon a high level assessment of contemporary aerial photography and LiDAR. The Cotswold Archaeology HIA is based upon a geophysical survey and a site visit. This confirms that there are no former water meadows in the eastern part of the allocation site (noting that a site visit would have confirmed this given the topography of the eastern side). This is a factual error in the LUC study. 4.5 The assessment of potential impacts on the remnant water meadows is incorrect. It is erroneously based upon the extent of the remnant earthworks being the entire allocation site which as set out above is not correct. The remnant features have little value beyond their physicality, which has been substantially eroded. If the definition of setting the surroundings in which a heritage asset is experienced is applied, then given the limited remnants and the fact that the earthworks are basically not experienced as they are so eroded, their setting must be commensurately limited. 4.6 It also assumes development across the entire allocation site which as per the wording of draft Policy H2.6, and the emerging Concept Plan, is not correct. The draft allocation policy precludes development on the western side, therefore preserving the assets, and there will be limited disturbance of the system (for access), which will be sensitively designed. This is more than appropriate design for a feature of low heritage importance. Southwick Court 4.7 The LUC Study is a high-level assessment based upon limited information and analysis; it fails to accord with Historic England's The Setting of Heritage Assets (GPA3). A full consideration of the setting is not given: a single aspect is taken, and greatly over emphasised. The assessment fails to consider the visibility of the listed asset, its insular nature, the lack of a designed setting and the impact of the post-war housing in the assessment. The risk of harm is again based upon development of the whole of the allocation site, and the loss of the erroneously identified eastern water meadows. 4.8 The subsequent discussions with the Council and Historic England, and the emerging proposals for the site, have been informed by the full HIA undertaken by Cotswold Archaeology. 4.9 This confirmed that the key setting of the listed buildings comprises their location within the historic moated enclosure, which is very insular in its setting with very limited views of the historic buildings from beyond. The main frontage of the house faces to the south-east, across its garden and away from the allocation site. The key setting of the listed buildings will not be harmed by development as set out in the Concept Plan. 4.10 In respect to the wider setting, the farmhouse was not designed within a parkland setting (its location is due to the former medieval moated manor), and its current agricultural setting is heavily influenced by the post-war development at Trowbridge and Southwick. Retaining the western part of the site open and free from development enables an open parkland setting to be maintained across the entire western part of the allocation site, and the delivery of a sensitively design access road through the detailed planning application (in terms of scale, material, landscaping and lighting) will ensure that effects of the western part of the allocation site on the designated assets are minimised. As shown on the Concept Plan, a new landscaped edge will be created on the

	<p>eastern part of the allocation site. 4.11 There is sufficient clarity to conclude that the allocation site can be delivered without unacceptable impacts on the identified heritage assets (in respect to the non-development of the western side, the sensitively designed access road and requirement for a full Heritage Impact Assessment), and that, through detailed design at the planning application stage, appropriate mitigation measures (both inherent and additional) can be secured which minimise the impact of the emerging proposals on the assets. It is agreed (with the benefit of the detailed HIA and emerging Concept Plan) that this harm would fall within the less than substantial harm as defined by paragraph 196 of the National Planning Policy Framework (NPPF), and as confirmed in Section 2 above, there is a clear and pressing need for additional housing within Trowbridge. Heritage Conclusions 4.12 The outcome of these discussions has informed the Concept Plan which is appended in Appendix 1, and also the proposed modifications set out in PC72. 4.13 As part of these discussions, it has been confirmed that a sensitively design rural access road will be required on the western side of the allocation site; with associated low level lighting, landscaping and minimal street signage. The exact details of this can be agreed through the future planning application, however, as per discussions with Historic England, we would support the inc</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

**Notification that the  
Inspectors Report into the  
Wiltshire Housing Site  
Allocations Plan has been  
published.**

**Future Notification that the Wiltshire  
Housing Site Allocations Plan has been  
formally adopted.**

<b>Comment ID:</b>	400	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1126678	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. The Council needs to correct the error in its assessment of Bratton as a Large Village which it is not. This should help prevent any further consideration of oversized developments. The proposed developments will be purely for the profit of local landowners and of no benefit to the village. They will only burden the services of doctors and school. The increase in traffic will be very dangerous - this was the grounds for past refusal so how can it be considered as a safe and sound proposal?</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	401	<b>Consultee</b> De Vernon Trustees  <b>Person ID:</b> 556491	<b>Agent</b> Woolf Bond Planning  <b>Person ID:</b> 901380	<b>Do you consider the Proposed Change to be legally compliant?</b>	
				<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>		SBR PC17			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	We refer to the proposed change so to include the new residential development on land south of Potley Lane as inside the settlement boundary. We agree this is built residential development that is fundamentally now part of the settlement and therefore support this change. In other respects we continue to object to the plan for the reasons set out in our September 2017 representations.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	402	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187843		<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. I agree with all the above comments and trust these applications will be refused.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	403	<b>Consultee</b> Chair Bishopstrow Village Meeting	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 709291		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC77				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Bishopstrow Village Meeting (Parish Council) met on 28 September 2018 and considered aspects of the Wiltshire Housing Site Allocation DPD, particularly those concerning proposed development at East of the Dene, Warminster (Housing Allocation H2.7). It noted that comments from Wiltshire Council (Conservation Officer) and Heritage England showed concern for the local area in terms of: Environment Landscape Heritage assets Impact on Bishopstrow Conservation Area The meeting further noted that the major impact on the development of the whole site was at its southern and eastern sections where the heritage assets of Bishopstrow House, The Cotes, Home Farm, listed walls and Bishopstrow Conservation Area are located. It was the meetings belief that a way of preserving the integrity of this part of the site would be to extend the boundary of the Bishopstrow Conservation Area as shown on the map below, where the extension is shown in red.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>	5137128				



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	404	<b>Consultee</b> Chair Bishopstrow Village Meeting	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 709291		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC78				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Bishopstrow Village Meeting (Parish Council) met on 28 September 2018 and considered aspects of the Wiltshire Housing Site Allocation DPD, particularly those concerning proposed development at East of the Dene, Warminster (Housing Allocation H2.7). It noted that comments from Wiltshire Council (Conservation Officer) and Heritage England showed concern for the local area in terms of: Environment Landscape Heritage assets Impact on Bishopstrow Conservation Area The meeting further noted that the major impact on the development of the whole site was at its southern and eastern sections where the heritage assets of Bishopstrow House, The Cotes, Home Farm, listed walls and Bishopstrow Conservation Area are located. It was the meetings belief that a way of preserving the integrity of this part of the site would be to extend the boundary of the Bishopstrow Conservation Area as shown on the map below, where the extension is shown in red.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>	5137128				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	405	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. Bratton is apparently a large village in a sought after rural location. A significant part of it is designated a CONSERVATION AREA, and while the proposed sites fall outside of this, the village needs to be taken as a whole if it is not to lose, irrevocably, the elements which make it worthy of conservation: its social history and special location at the foot of the Plain. It is NOT a suburb of Westbury and should never become one. Quite apart from the factual and statistical inaccuracies and nonsense of these proposals, planners have a statutory duty to safeguard the Conservation Area. It will be damaged beyond repair by the totally overblown and unnecessary proposals.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			

<b>proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	406	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	407	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 704026	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. These 2 sites are totally inappropriate for a village the size of Bratton, especially considering the fact that the village has been incorrectly categorised. The natural aspect of the village will be damaged forever by allowing the development of 2 modern housing sites at the western B3098 entrance to the village. The village is inappropriately served by public transportation to support such a huge expansion. The overall road system is also ill-founded for such development also.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	408	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 703974	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional comments: 1. I agree with the comments [above]. A large scale development would ruin the village, also the increase of traffic, especially in Court Lane, which is already dangerous at times. 2. A few houses would be appropriate.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	409	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187845	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. These are ill conceived proposals which breach the Council's own protocols regarding rural development and the information on which they are made is inaccurate. They would bring nothing of benefit to the village should they be allowed to be built but will ruin its character and charm.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	410	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187736	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Associated evidence documents		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Appendix 3 to Cabinet Report 3rd July 2018 Note on Elm Grove Field and Implications for Asset Transfer (July 2018) (WHSAP/04)				
<b>Please give details of why you support or do not support the updates to the</b>	Petition to fight against the proposals for the Queen Elizabeth II Field. [A total of 348 signatures have been collected].				

<b>associated evidence documents.</b>	<p>Reasons why we need to fight the proposals.</p> <ol style="list-style-type: none"> <li>1). The loss of our only green area, for children to play, people exercising and dog walkers to use.</li> <li>2). The field became part of a legacy, after the London Olympics. It has been a recreational area for the past 30 years.</li> <li>3). Increased traffic on Wiltshire Drive. At least 12 recorded accidents in recent years.</li> <li>4). Large lorries entering the field from Wiltshire Drive, during the adjacent housing development, prior to a school being built.</li> <li>5). Do we need a new school? Schools are included in plans for the Yarnbrook to Hillperton development.</li> </ol>		
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	411	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>		PC67			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Response to 2nd Consultation: regarding Site 1021 Church Lane, Trowbridge WHSAP - Focussed consultation on the Schedule of Proposed Changes and associated evidence documents Having looked at the documents containing the changes made following the original WHSAP consultation process I have concluded that the following material considerations regarding proposed Site 1021 made during the consultation have not been taken on board: 1. Ancient hedgerows - we can evidence that the hedgerows were all in existence before 1850 (through maps) and are therefore protected under the Hedgerow Act. 2. There is contradiction in the approach to discounting sites based on the settlement boundary. 3. The Council could not have taken into account the heritage, environmental and flood importance of the site at the stage when they discounted sites in 2015-2017 as we brought this to their attention in Sept 2017. When these factors are taken into account by the WHSAP the tiny Site 1021 with its unique historical rural setting and home to rare species of wildlife will become even more inappropriate to develop by comparison with the vast majority of other potential sites.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	412	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC68				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Response to 2nd Consultation: regarding Site 1021 Church Lane, Trowbridge WHSAP - Focussed consultation on the Schedule of Proposed Changes and associated evidence documents Having looked at the documents containing the changes made following the original WHSAP consultation process I have concluded that the following material considerations regarding proposed Site 1021 made during the consultation have not been taken on board: 1. Ancient hedgerows - we can evidence that the hedgerows were all in existence before 1850 (through maps) and are therefore protected under the Hedgerow Act. 2. There is contradiction in the approach to discounting sites based on the settlement boundary. 3. The Council could not have taken into account the heritage, environmental and flood importance of the site at the stage when they discounted sites in 2015-2017 as we brought this to their attention in Sept 2017. When these factors are taken into account by the WHSAP the tiny Site 1021 with its unique historical rural setting and home to rare species of wildlife will become even more inappropriate to develop by comparison with the vast majority of other potential sites.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	413	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187847	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposed change to remove the Ridgeway Farm site from the Wiltshire Housing Site Allocations Plan on the basis that: The proposed Ridgeway Farm development includes an additional 40 dwellings which, together with the 10 dwellings recently built on this site, represents a near 20% increase in dwellings in the village of Crudwell. This is a disproportionate increase and is concentrated on one site. There is no strategic need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" to meet local needs. Ridgeway Farm is not a small site. The Crudwell Neighbourhood Plan is progressing well and is planning to allocate land to meet identified needs. The Neighbourhood Plan is taking into account the concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full consideration of the options available and any applicable environmental and infrastructure constraints. It will allow the community to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	414	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126922	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC69				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Response to 2nd Consultation: regarding Site 1021 Church Lane, Trowbridge WHSAP - Focussed consultation on the Schedule of Proposed Changes and associated evidence documents Having looked at the documents containing the changes made following the original WHSAP consultation process I have concluded that the following material considerations regarding proposed Site 1021 made during the consultation have not been taken on board: 1. Ancient hedgerows - we can evidence that the hedgerows were all in existence before 1850 (through maps) and are therefore protected under the Hedgerow Act. 2. There is contradiction in the approach to discounting sites based on the settlement boundary. 3. The Council could not have taken into account the heritage, environmental and flood importance of the site at the stage when they discounted sites in 2015-2017 as we brought this to their attention in Sept 2017. When these factors are taken into account by the WHSAP the tiny Site 1021 with its unique historical rural setting and home to rare species of wildlife will become even more inappropriate to develop by comparison with the vast majority of other potential sites.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	415	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1132247	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I am writing to support the proposed change (PC92) to remove the Ridgeway Farm, Crudwell site (Housing Allocation H2.13) from the Wiltshire Housing Site Allocations Plan . The proposed development at Ridgeway Farm is inappropriately large and were it to go ahead, would have a detrimental impact on the community for all the reasons stated in previous consultations. The proposed change to have this development removed from the WHSAP is therefore welcomed and I support it on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. The Crudwell Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring) and will allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future. I trust that this and similar representations will result in PC92 going ahead and thank you for your consideration in this matter. Please acknowledge safe receipt of this letter. Thank you.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	416	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 466628	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC100				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>I have been trying without success to use the website to make additional comments on these issues. As the consultation closes today I hope that use of this email address (copied to [REDACTED] and [REDACTED] ) will suffice. I commented on the initial draft previously but this was without sight of the "amended" Local Transport Plan which has now been made available. As a resident of 15 years living directly on Netherhampton Road I am personally affected by traffic issues which affect my family's health and well being. Over the period of my residence the traffic has increased enormously, particularly in the form of heavy lorries, most of which are at the maximum weight limit allowed (and probably in some cases over the limit). Netherhampton Road was designed as a "B" road but has since had designation (without any upgrading) as an "A" road. Previous consultations by Wiltshire Council has stated the residents of Harnham cannot use the size of this road to prevent development, but no consideration has been given in any plans to the increase of these heavy vehicles. There is much emphasis through the draft plan on preventing car use and yet nothing addresses anywhere that I can see the issue of these goods vehicles. Far from being an overall transport strategy this plan appears to be directed solely at the residents of Salisbury and their private car use. The heavy lorries using the A3094 Netherhampton Road commence noisy almost continuous transit along this road from approximately 3.40 a.m. My sleep patterns are such that I am awakened by the first of these Monday to Friday between 3.30 and 3.50 am. For a period I kept a diary which was passed to my local councillors and research was carried out into the traffic levels. Results showed that in excess of 40% of this traffic did not have business in Wiltshire but was using the road as an unofficial by pass to the Salisbury. The arrival of satnavs as a norm in vehicles has assisted in increasing the volume of traffic in the past 10 years. This research also showed the average speed of all vehicles was at least one third over the speed limit of 30mph. All Wiltshire Council figures appear to look at the times between 08.00 to 10.00a.m, and 15.00 to 17.00. The actual reality of the "nuisance" traffic is far outside these boundaries. Much of the traffic at the Gyratory end between these times is school run traffic which is an issue the Council fails to address. Genuine commuting or business traffic commences far earlier. I am happy to invite a representative to my home at 3.30 a.m. if he wishes to witness this! In the past year alone I have had to ask Wessex Water to repair the water main outside my home twice and they have also had to dig up the road and fill holes caused by traffic weight (not potholes but subsidence of the road surface). In the time I have lived here there has rarely been a period when the road has not had some sort of collapse or serious damage to drains, gas pipes or water mains. Structurally the road is not suited to the heavyweight vehicles constantly using it. Added car movements and construction traffic from any housing sites will compound this. When these vehicles hit these holes, even at 30 miles an hour, my house shakes and I have even had pictures fall from walls. My bungalow has a frontage of 30 feet so I am set back from the road which other</p>			

residents do not have the good fortune to be. The Transport plan acknowledges that there is little that can be done at the Park Wall end and that only some minor adjustments can be made at the Harnham Gyratory end of the road. The proposed site of these new homes is more or less midway between these two junctions. Harnham has no facilities apart from one local One Stop shop about 120 yards from my house. This offers little parking and is on a blind corner on to Netherhampton Road. The site proposals do not include any local shop facilities so this shop will no doubt be the nearest option for residents adding to traffic and parking congestion, I would add that is not uncommon for the lorries to pull up on Netherhampton Road to use this shop with the consequences of blocking the road, this despite yellow lines, a traffic island and a pedestrian crossing in close vicinity. The estate encompassing Essex Square, Wiltshire Road etc has only two roads accessing it from Netherhampton Road. These are from Norfolk Road where the shop is and at the traffic lights from Saxon Road. The latter is often heavily congested with school traffic. On occasion it has been known for residents to have to wait as long as 10 minutes to turn safely from Norfolk Road into Netherhampton Road. Any further congestion from people living on the new housing sites will greatly increase the problem. Much is made of s.106 Agreements in the plans but these are not guarantees to residents currently living in Harnham who already have the effects of traffic to deal with. Much is made of a 15 minute bus service to these new sites. When I moved to Harnham there was such a service but these buses have now been cut over the years to 30 minutes and hourly on Sunday. There is no compulsion to private bus companies to run these services and therefore no guarantee. Buses within Salisbury are extremely expensive. To reach the district hospital from Harnham requires 2 buses, one taking you into town and the second taking you out. Return fares on this journey amount to around £8.00 per trip per person. Assumedly any residents on the proposed sites would therefore use a car for the journeys. The travel plan refers to 4 major employers been envisaged in the City centre. Salisbury once had a large number of roles in the financial services sector. In the past 2 years all but one of these companies have left the area with the result that the specialist roles the employees fulfilled are no longer available. Those employees kept on by the merged companies now commute out of Salisbury, mainly by car due to the inadequacies of links to places such as Swindon which is now Wiltshire's one remaining large employer in financial services. The reference in the transport plan to commuters into Salisbury from outside the area is now out of date. On top of this the Salisbury City Council has allowed change of use of all but one of these major office buildings to make Retirement homes and flats. There remains only one office for rental by business, and since the redevelopment commenced it appears not one business is moving in any time soon. To develop a transport plan based on workers based in the City centre appears incorrect when it is assuming there will be 2,500 employees in City centre sites. My enquiries of Wiltshire Council have confirmed that these major employers are hypothetical at this stage. Following the Novochock incidents in Salisbury and Amesbury Wiltshire Council introduced free parking in these areas in an effort to get people back into the City. Judging from the amount of vehicles in the three hour parking bays around town during the all day free parking the number of visitors increased considerably particularly on Saturdays. Contrary to the Council's statements Salisbury only has one Wiltshire Council long stay car park and even during the all day free parking these bays were never full. If visiting Salisbury when parking fees apply the cost is extortionate in comparison with facilities and shops within the City. The free parking experiment has encouraged people back into the City but numbers are already appearing to drop off now it's only free from 3.00p.m. Put bluntly the cost outweighs any benefit to visitors. Even hotel guests have to rush to their cars before parking charges start to tick over as tickets in the long stay car park run from 8.00 a.m. If the Council is serious about redevelopment and rebranding the City they must address these issues without constantly telling residents they must not use vehicles. Recent research following the Novochock incidents has led to estate agents stating that 60% of properties in the area are sold to people from outside. These proposed new properties will be beyond the finances of the average Salisbury worker. The average wage in Salisbury according to payscale.com is just under £24,000. Houses built on the site in Netherhampton Road will clearly not be of high value due to their location and yet as Salisbury is the 7th most expensive town wage to house price ratio in the United Kingdom they will be well outside the pockets of the local people of Harnham and it's surrounding areas. If these areas have to be allocated could they not be used for some of the new council housing the Government as announced rather than to invite more outsiders in to commute out? There is mention of a new primary school in the plans but no doctors surgery. Harnham, which is a



considerable size, has no doctors surgery within its local area meaning travel by residents to other sites within the City centre and the outskirts is necessary. Like most areas there is a problem getting factor's appointments and the building of some 700 homes without new facilities will put even more pressure on the medical facilities. s.106 Agreements will not cover these facilities from what I understand. These two sites offer very little apart from housing. Tinkering with roads, adding cycle paths etc will not remove the unsuitability of the areas chosen without major commitment to the road network, access problems and more importantly doctor surgeries, shops and leisure outlets. As described in these plans any homes on these sites are just fill ins of land with high density houses. There would be no sense of community or belonging as they are too remote from either the City Centre or Wilton. Harnham has a few public houses and a social club but these are around 2 miles from the sites and not accessible. Plannine in Salisbury has taken a scatter gun approach over the years causing many of the traffic problems as a result. An example of two faxed planning is the soon to be opened drive through McDonald's on the Southampton Road. So congested with traffic is this stretch of road that our local MP has stated today that he is "watching this road". Traffic queuing here can often stretch back to Exeter Road roundabout at all times of the day. Who in their right mind would therefore consider adding a drive through restaurant into this major blocked artery a good idea? It seems ridiculous for Wiltshire Council to rage about traffic in the centre of Salisbury when planning allows more and more development along this road which can realistically only be reached by car - the name drive-thru giving the game away. In October 2018 research by the group Transport for New Homes concluded that current planning rules by numbers of homes in an area rather than offering local facilities was creating estates where people were "trapped in car dependency". This report looked at 20 housing sites around the country and ironically highlighted as one of the worst an estate in Trowbridge, Wiltshire - the home of Wiltshire Council. This report states: The problem is that planners are measured by whether they hit their targets for new housing, she said. At the moment they just approach developers who are sitting on greenfield sites and end up peppering housing round towns without any regard to whether the land is accessible or not. Ironically they are describing the Netherhampton Road sites exactly! Salisbury is in a complete muddle at present following the Novochock incidents, departure of major employers in the area and the closure of many shops in the City centre. It is arguable whether these allocations are even in the right area of Wiltshire to be useful. No one is actually certain how things will develop in the nexr 10 years. The lack of local jobs currently available in the mid-salary range will affect new people moving into the area. Certainly Salisbury City Council has taken steps with its planning agreements for retirement complexes over business use to state inadvertently that they envisage a much older demographic development for the area. As I have already stated previously I object to this ill planned development on the grounds of traffic increase, air quality, lack of facilities etc. However I would say that I would not object to a smaller development of rentable council or housing association homes for those on the Council waiting list for Salisbury houses if proper facilities such as shops, doctors surgery, leisure facilities were on site thereby hopefully reducing car reliance and properly planned. Development on the proposed scale without these facilities and road improvements such as a by pass will only add to the existing problems. If these sites do go ahead for development of any kind could I suggest that building site traffic is only allowed to enter from the Park Wall end of tge A3094 to at least give residents of Netherhampton Road relief from the dirt and traffic problems during any presumably long construction period.

**Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:**

**Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).**

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	417	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187849	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>				

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional comments: 1. I moved to Bratton from London in January 18 as it was No 1) a village No 2) quiet No3) safe. If such a large number of houses are built as proposed Bratton will cease to be a village No 2) it won't be so quiet due to increased traffic and No 3) it certainly becomes increasingly less safe. Furthermore the proposal does not meet expectations of 'villages'! Statistics should not be fudged - could end up a criminal offence.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes
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<b>Comment ID:</b>	418	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187850	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	We have a sound neighbourhood plan which is progressing very well. Reg 14 is planned for November 2018, and Reg 16 is planned for early next year. This neighbourhood plan is aiming to allocate land to meet identified housing needs. The parish should be able to determine its own future, as set out in the Council's and the Government's localism agenda. The neighbourhood plan's agenda is consistent with the National Strategy: small scale housing developments (less than ten) are promoted in large villages. For these reasons, I support the proposed change to remove the Ridgeway Farm site from the Wiltshire Housing Site Allocations Plan.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	419	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 446468	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Associated evidence documents		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Council - Salisbury Transport Strategy Draft Strategy Refresh 2018 (July 2018) (WHSAP/08)				
<b>Please give details of why you support or do not support the updates to the</b>	I am responding to the consultation on Wiltshire's housing site allocation plan.				



<p><b>associated evidence documents.</b></p>	<p>Has anyone come to Harnham to see for themselves the TWO roads out. I somewhere read an incredible statement from, I believe , a councillor stating that there would be little extra traffic!!</p> <p>840 ish houses would generate 1600 extra cars on the two roads. The road I live in has an average of two cars per house so I assume the same would happen on the new estate. Talking to someone in the council, there are plans for a school and retail outlets eg Tesco.</p> <p>So that's a school with teachers, Teaching assistants, admin staff, canteen workers etc, few of them local so again added traffic not to mention the parents driving to the school. The new store will generate traffic from Wilton and the west side of Salisbury and we will have gridlock. The Tesco store would need many large articulated lorries to keep the shop stocked. The roads are not wide enough to allow this added traffic</p> <p>If you want to build a southern by-pass this might work but as I said there is only one road out to the west and one to the east, already congested now at certain times of the day.</p> <p>The road I live in turns into the main road via traffic lights and some parts of the day it is nearly impossible to drive out of the road due to stationary traffic across the junction!!!</p> <p>I know the government is pushing for all these houses but this would be a traffic nightmare and must be stopped. This is a disaster waiting to happen. I don't suppose any of the people pushing for this to happen live in our area?</p> <p>The council should continue to look for brown sites etc like UK land and stop building on our fields or we will have to source more and more food from abroad!!!</p>
<p><b>Supporting documents (Please see Objective)</b></p>	
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	420	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187854	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Building these houses in the area approaching the village will be an eyesore and detrimental to the village as a whole. The number is for too large for a village of this size, and goes against Wiltshire's own guidelines. The figures used to justify the build area are also inaccurate. The increase in traffic is not acceptable and housing should only be considered as part of the Neighbourhood Plans and not an imposition from the centre.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	421	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187855	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposed change, to remove the Ridgeway Site Allocation from the Wiltshire Site Allocation DPD, on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" to meet local needs. Our village's Neighbourhood Plan is progressing extremely well (Reg 14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	422	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187433	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposed change, to remove the Ridgeway Site Allocation from the Wiltshire Site Allocation DPD, on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to "small sites" to meet local needs. Our village's Neighbourhood Plan is progressing extremely well (Reg 14 Consultation planned for November 2018 and Reg16 planned for early Spring), and is planning to allocate land to meet identified needs. The Council's and Government's Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	423	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187859	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			

<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	424	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187860	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	425	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187862	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. We are a village. Let's stay that way not an extension of Westbury!</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	426	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187864	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>				

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. I understand houses are needed but surely there are enough houses been built in Westbury to accommodate the requirements for this area. As stated the road around Bratton are not adequate for the increased traffic.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	427	<b>Consultee</b> Gladman Developments	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1149598		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC16				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>RE: Wiltshire Housing Site Allocations Plan - Focussed consultation on the Schedule of Proposed Changes and associated evidence documents (including revised Sustainability Appraisal and an update to the Addendum to the Habitats Regulations Assessment) This letter provides the response of Gladman Developments Ltd. (hereafter referred to as Gladman ) to the Wiltshire Housing Site Allocations Plan - Focussed consultation on the Schedule of Proposed Changes and associated evidence documents (including revised Sustainability Appraisal and an update to the addendum to the Habitats Regulations Assessment) , which is being consulted upon until 9th November 2018. This consultation relates to a Schedule of Proposed Changes that was submitted to the Secretary of State alongside the Local Plan. Gladman note that the Councils Examination website includes correspondence between the Inspector (PC01, PC01a and PC02) in which it was agreed that a six-week period of public consultation would be undertaken on the proposed changes in advance of the Hearings Sessions stage of the Examination. Gladman welcome the opportunity to comment on the proposed changes and agree that they would represent main modifications to the plan that was previously published for consultation under Regulation 19 in Summer 2017. Having considered the consultation documents that have been published by the Council, Gladman would wish to reiterate the continued relevance of our representations that were submitted on Friday 22 September 2017 during the Regulation 19 consultation. We also maintain our request to be provided the opportunity to discuss the matters that we have raised further at any associated Hearings Sessions in due course. The comments provided below should be read alongside our representations that were made in September 2017, which can be found enclosed for information. Overview Wiltshire Local Plan 2006 2026 Since the Regulation 19 consultation in Summer 2017, the national planning policy position has evolved. In particular, the Revised National Planning Policy Framework, July 2018 has been published (NPPF2) confirming the introduction of a new standard methodology for the calculation of housing needs. It is noted that NPPF2 will not directly impact upon the Wiltshire Site Allocations Plan at this stage due to transitional arrangements being in place for those plans submitted for Examination before 24 January 2019. However, the requisite requirements within the standard methodology are expected to see the annual housing requirement for Wiltshire increase and are therefore relevant in the wider context of the Wiltshire Local Plan and the pressing need for it to be comprehensively reviewed. As set out in our previous representations, the Wiltshire Core Strategy that was adopted in January 2016 was predicated on the need to ensure that it is the subject of a partial review at an early date, reflecting both the need to look forward to an appropriately long term end date (and in this context the need for minimum 15 year plan periods have been confirmed through paragraph 22 of NPPF2); and, the need to reflect up to date evidence of housing need. Gladman continue to stress that the minimum housing requirement set out through the Core Strategy and the associated Inspectors Report is not a capped target</p>			

and should not therefore be treated that way through the production of the Site Allocations Plan. Housing Delivery Strategy and the Settlement Boundary Review It is noted that the schedule of proposed changes is supported by Topic Paper 1: Settlement Boundary Review Methodology. Gladman continue to raise concerns at this proposed approach to managing development at the edge of settlements, as it fails to provide flexibility to support sustainable forms of development from coming forward or recognise the indicative nature of the proposed distribution of housing in the Core Strategy (as set out in Section 4.2 of our previous representations). Topic Paper 1 highlights some examples of local authorities where settlement boundaries have been proposed or are included within local plans. However, this benchmarking is selective and fails to consider local planning authorities that take forward a criteria based approach to managing growth at the settlement edge (e.g. Harborough District Council) or authorities that provide flexibility within policy wording to ensure that development adjacent to settlement boundaries can come forward in circumstances where it is demonstrably sustainable or the need exists, including needs associated with the maintenance of a rolling five year supply of housing land (e.g. Derbyshire Dales District Council and South Derbyshire District Council). It is noted that the revised Settlement Boundary methodology proposes to exclude employment development at the edge of large villages. Gladman are of the view that the existing built form of a settlement should be included in its entirety where settlement boundaries are proposed within local plans. Furthermore, the Councils decision to exclude proposed site allocations and unimplemented planning permissions from settlement boundaries is also a critical issue that will need to be positively managed through the Councils monitoring and decision-making processes. Gladman are of a view that site allocations and consented sites should be included within settlement boundaries. Site Allocations Within Gladmans previous representations, concerns were raised that the emerging Site Allocations Local Plan was failing to bring forward a strategy that could meet the minimum housing requirement set out in the adopted Core Strategy or meet objectively assessed housing needs. Having reviewed the Schedule of Proposed Changes and associated Topic Papers, the opportunity has not been taken to improve this position. Indeed, it appears to have worsened. An updated version of Figure 1 Currently Proposed Contingency of Housing Land is provided below: [SEE TABLE IN ATTACHMENT] It is now considered highly unlikely that the minimum requirement will be met over the plan period and the proposed plan is therefore considered by Gladman to be inconsistent with national policy. In particular, paragraph 47 of the original National Planning Policy Framework (NPPF1), which requires local planning authorities to boost significantly the supply of housing. In plan-making, it is essential that the housing requirement is treated as a minimum rather than a maximum ceiling. In the case of Wiltshire, this is exacerbated by the fact that the Core Strategys housing requirement does not reflect the Full Objectively Assessed Housing Needs. Gladman are of the firm view that greater headroom is required within the Wiltshire Local Plans housing allocations as a result. As set out in our previous representations to the Local Plan, Gladman consider that there is a need to provide a contingency of sites at the upper end of the Home Builders Federations suggested range (20%). This continues to be an approach that Inspectors endorse in local plan examinations. In addition to the examples highlighted in our previous representations at paragraph 4.3.5, a 17% contingency has been applied to the Derbyshire Dales Local Plan (examined Spring 2017); a 17% contingency has been applied in the Rugby Local Plan (examined Summer 2018); and, a 16% contingency has been applied in the Stockton-on-Tees Local Plan (examined Summer 2018); Our previous representations included a table at Figure 3 that highlighted the required surplus that would need to be identified to secure a 20% contingency. For completeness, this has been updated below to reflect the Councils most recent position: [SEE TABLE IN ATTACHMENT] The Councils site selection process (set out in Topic Paper 2, July 2018) indicates that the requirement of the Site Allocations Plan is to allocate sites for housing development to ensure enough land is allocated to help meet the minimum requirements of each housing market area (paragraph 2.1). This is considered by Gladman to be a mis-interpretation of national policy on this matter, which seeks: to significantly boost the supply of housing; meet objectively assessed housing needs for the housing market area in full over the plan period; include flexibility to allow rapid responses to change; and, to positively seek opportunities to meet the development needs of the area. Implementation and Monitoring As stated in our previous representations, there is a pressing need for the Wiltshire Local Plan to be comprehensively reviewed. A clear monitoring and review mechanism is required within the Plan to ensure that the it is fully responsive to changes in circumstance relating to the development needs of the area and the maintenance of a five year housing land supply. Any such

	mechanism should be built into policy wording and set an unambiguous commitment to review the plan, or specific policies of the plan, within a firmly agreed period.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5139585		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	428	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187722	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [CRUDWELL PLANNING APPLICATION]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	My husband I wish to register our complaint about the proposed development at The Ridgeway Site, Tetbury Lane, Crudwell. It will completely swamp the village and take away its identity. Tetbury Lane is a narrow road, which is used extensively during the year by large (and growing even larger) tractors and farm vehicles which make walking up the lane to the much used village hall difficult without the addition of more housing. The lane has been running with water during the heavy bursts of rain which we have had since the new houses were built. They are built on a slight rise and the road washes the water away down the lane, the drains are not kept clear (they are plugged with leaves, mud and plants growing in them) so the water rushes down the road to the main highway. The school in the village is packed to capacity (I know this for a fact as I help there) and the doctors' surgery in Malmesbury is difficult to get an appointment because of the new housing around Malmesbury. With the increase in staff at Dyson (much needed jobs brought to the area), the A429 is particularly busy from 6am through to 6.30pm. It can take several minutes to get out from Tetbury Lane if you need to access it at 8.30am or from 5pm. This planning application needs to be thought through very carefully so as not to lose the identity of a very lively and hospitable village.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		



<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	429	<b>Consultee</b> Director Jack Jarrett Architects	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187771		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Consultation on the draft Wiltshire Housing Site Allocations Plan - Sites 321 and 738 To whom it may concern I write with the following comments on the proposed developments noted above, which I trust the above may be of use: Quantity of houses Bratton is deemed a large village under Core Policy 32 of the Wiltshire Core Strategy (WCS). Paragraph 4.15 states development in large villages 'will predominantly take the form of small housing (defined as sites involving fewer than 10 dwellings). Both sites propose significantly greater than 10 dwellings - Site 321 proposes 35, and Site 738 proposes a further 22. Both would therefore be considered as major applications. I am unaware of any justification for the increased demand for housing in Bratton, and welcome any further information on this. Table 5.19 of the WCS states 55 more houses are needed to be provided by 2026 across the remainder of the Westbury Community Area. The proposed sites in Bratton would exceed this, irrespective of any other proposed developments across the community area. It would be illogical for Bratton to absorb this need in its entirety, especially given that Dilton Marsh (for example) has better access to both employment and transport links. The proposed development would see a 10-15% increase in dwellings (there is a discrepancy between Wiltshire Councils and Bratton Parish Councils figures for the number of existing houses (819 vs 506)), which is a significant addition to the village, with no proposed employment or any other additional services. The significance either of these developments will have upon the village should also ensure a thorough and comprehensive public consultation and engagement is undertaken to ensure the appropriateness of any development. Location of development 'There is a general presumption against development outside the defined limits of development of Large Villages (WCS 4.16). I believe both sites currently lie outside the Bratton settlement boundary (I appreciate this has recently been the subject of a proposed revision), and would also have a significant impact on the setting of both the village and the surrounding countryside. Density of development I appreciate the need to maximise developable plots of land, but the proposed density of both developments should take into consideration the surrounding built context (NPPF paragraphs 122-123). Both sites densities exceed densities seen elsewhere in the village, and are approximately 1.5x greater than the adjacent Court Orchard estate, which itself has a higher density than elsewhere in the village. This would amount to an incongruous grain, especially considering that both sites lie on the the boundary of the village (not the centre, where density would typically increase). Given these sites would in effect form the western entrance to the village, care should be taken to ensure appropriate and sensitive development. Sustainability CP1 (WCS) states that development at Large [ ] Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. NPPF paragraphs 72 &amp; 78 promote developments which support and aid a sustainable community. Both sites would only provide housing (potentially in excess of what is needed), and do not provide any greater</p>			

	community benefit. Highways Bratton has few viable alternatives to transport beyond the use of private car. Further, with little local employment, and typically 2 cars per household, development would see a significant increase in vehicular use, with both sites only able to access the B3098. Again, this would show no great reason for the proposed increased in density, which is typically applied where there is less reliance on private cars. These developments would only further increase reliance on the car, contrary to CP34.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	430	<b>Consultee</b> Planning Liaison Officer Environment Agency	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 555472		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC13				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Thank you for consulting the Environment Agency on the proposed changes to the above strategic document. We wish to offer the following comments. In our response to the Wiltshire Housing Site Allocations Plan (WHSAP) Pre-Submission Draft Plan, June 2017 (letter from Katherine Burt, dated 22 September 2017) we considered the Plan to be unsound. We note that our comments have been incorporated in the proposed changes to the Plan, therefore we now consider the Plan to be sound, provided all other related Plans (e.g. The Hampshire Avon Nutrients Management Plan) are carried forward and implemented. Below we offer further comments relating to the proposed changes. Flood Risk Relating to proposed change ref number PC13 on page 5 and PC51 on page 20, we note that two sites in Trowbridge Upper Studley and Elizabeth Way have had their housing numbers increased. In our previous comments we specified that any housing on these sites must be kept within Flood Zone 1. Therefore we would request that you check whether the amount of Flood Zone 1 on the sites can adequately accommodate the increase in housing, i.e. will there be enough space on the site?				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	431	<b>Consultee</b> Planning Liaison Officer Environment Agency	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 555472		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC51				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Thank you for consulting the Environment Agency on the proposed changes to the above strategic document. We wish to offer the following comments. In our response to the Wiltshire Housing Site Allocations Plan (WHSAP) Pre-Submission Draft Plan, June 2017 (letter from Katherine Burt, dated 22 September 2017) we considered the Plan to be unsound. We note that our comments have been incorporated in the proposed changes to the Plan, therefore we now consider the Plan to be sound, provided all other related Plans (e.g. The Hampshire Avon Nutrients Management Plan) are carried forward and implemented. Below we offer further comments relating to the proposed changes. Flood Risk Relating to proposed change ref number PC13 on page 5 and PC51 on page 20, we note that two sites in Trowbridge Upper Studley and Elizabeth Way have had their housing numbers increased. In our previous comments we specified that any housing on these sites must be kept within Flood Zone 1. Therefore we would request that you check whether the amount of Flood Zone 1 on the sites can adequately accommodate the increase in housing, i.e. will there be enough space on the site?				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	432	<b>Consultee</b> Planning Liaison Officer Environment Agency	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 555472		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC111				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The Yard, Salisbury We have no objection to the addition of this site.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	433	<b>Consultee</b> Planning Liaison Officer Environment Agency	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 555472		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC80				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Bore Hill Farm, Warminster PC80, page 34 Since we made our previous comments, the allocation of this site has stimulated much local public interest. The Environment Agency have been involved as we are the regulator in charge of Permitting the adjacent waste management facility (Anaerobic Digestion [AD] plant). We previously made a comment about the potential for odour from the plant to be an issue for new residents. We wish to add to the strength of our comments by adding that we have many records of odour complaints relating to this AD plant. Despite the fact that we are working with the site operator to address this problem, odour persists as an issue for many existing local residents. Therefore, we can be confident in saying that odour is very likely to be an issue for new residents at Bore Hill Farm in the future. In light of this, we would encourage Wiltshire Council to carefully consider the allocation of this site for housing. Notwithstanding this, we would not wish to object to this allocation.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	434	<b>Consultee</b> Chairman East Boreham Residents Action Group (EBRAG)	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 706891		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC77				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>The local community believe that the H2.7 East of Dene (Home Farm) site should be removed from the proposed DPD. The reasons are attached by separate sheet to the document. [see below]. The views represented in this paper are that of the local East Boreham community submitted on their behalf by the East Boreham Residents' Action Group (EBRAG). The aim is to ensure that development in and around East Boreham is sustainable. EBRAG formed in 1980, but still retains an active, experienced and knowledgeable committee, a data base of some several hundred concerned residents and a website (currently being reconstructed) with over 7,000 hits. EBRAG has held several well attended public meetings, regularly updates local residents on the current situation through email and leaflet drop and has the backing of the local county MP, ward town councillors and clearly the local community. EBRAG has submitted many representations on the Wiltshire Council websites against a speculative development application 16/10502/OUT and the original proposed Wiltshire Council Spatial Planning WHSAP/20 for site H2.7, dated 22nd September 2017. These documents should be read in conjunction with this further submittal. The community feels that the proposed revised changes to PC76, PC77 and PC:78 within the WHSAP for Housing Allocation H2. 7 does not adequately reflect the many representations and specific concerns made on this proposed allocation during the initial and subsequent consultation. The Wiltshire Council changes only repeat the policies in the National Planning Policy Framework (NPPF) that a Planning Authority would be required to follow. The Regulation 22 (1) (c) Report Consultation Statement Appendices M -P (Paragraph 21.74) indicated that 64 representations were received and documents the Wiltshire Council response. The following paragraphs highlight the local communities continued concerns with the lack of proposed changes following that representation. Landscape/ conservation Issues Issues raised Disagreement over potential landscape/conservation impacts and the suitability of parts of H2.7 site to be developed. Wiltshire Council Response Assessment of H2.7 site and the raised concerns by Wiltshire Council officers has led to the conclusion that development should be located primarily within the northwest part of H2.7, where landscape and conservation impacts can be more effectively mitigated. Proposed change by Wiltshire Council following representation None. EBRAG comment The conclusion from the 2017 Landscape Assessment Part stated - "The site contributes to the setting of Bishopstrow Conservation Area, Battlesbury Hill and south eastern edge of Warminster. There are also views through the site from the local PRoW network north towards Battlesbury Hill and south towards the treed Bishopstrow Conservation Area. It would be difficult to mitigate the removal of these features should the site be developed. However, proposed development would be less constrained in the north west of the site due to the proximity of existing development and the lower sensitivity in terms of wider landscape setting and views. Boundaries to development could be planted with groups of trees, copses and individual specimen trees to help mitigate the effect on landscape character and views. The</p>				

northern, south western and eastern parts of the site would be more sensitive to development due to the proximity of the Conservation Area and views north towards Battlesbury Hill. The overall capacity to accommodate change would be moderate -/ow". The Landscape Assessment does not consider the views from Battlesbury however the Heritage Impact Assessment does indicate a potential for - "setting change to Battlesbury Camp hillfort (SM) in vistas to the south from the monument". The landscape associated with this site has not changed since the Planning Inspectors Report into the West Wiltshire District Plan in 2004 who, when considering the location of Warminster's Settlement Boundary, commented - "/ saw that the land mostly comprises arable fields, with similar fields to the north, together with a few cottages and other houses (some set in trees) and bounded by lanes or roads, to the east, west and south. Although there is urban development immediately to the west (across Grange Lane), the area has a pleasant and obviously rural appearance and is very much on the edge of Warminster. From my observations from local footpaths to the north, west and east of the area and from Battlesbury Hill, I consider that the land relates well in visual terms to the open countryside to the north and east, forming an integral part of the countryside east of the town. I accept that a high stone wall and cottages fronting Boreham Road impact on any meaningful visual relationship with the countryside to the south, other than when seen from the Hill top. However, in view of the open-ness of the land and its linkage with other open land to the east and north (and especially Battlesbury Hill), I consider that the town policy limit hereabouts should be drawn along the eastern edge of the denser development fronting The Dene, St George's Close and (the southern part of) Grange Lane". The current Heritage Impact Assessment (LUC) provides a much more comprehensive and detailed assessment including the effects of limiting development in the north. This document details much more significant effects than were considered by the Sustainability Analysis and therefore should be reviewed in entirety before any decisions are reached. River Avon SAC Issues raised The need to protect biodiversity (River Avon SAC and 5551, local wildlife). Wiltshire Council Response Additional wording is proposed to be added to the supporting text to ensure that the policy adequately addresses the need to protect the River Avon SAC. EBRAG Comment Although Wiltshire Council Response indicates that a wording change is proposed, EBRAG cannot identify any change in PC76, PC77 and PC78 that relates to change. The main problem affecting the River Avon SAC is phosphate concentration. To this end Wiltshire Council has a Nutrient Management Plan (NMP) to identify appropriate and proportionate mitigation measures. However, the Planning . Officer's report on application 17-01463-FUL to the Strategic Planning Committee 15th August 2018 stated - "The aim of the NMP is to bring phosphate concentrations in the River Avon SAC down to the conservation targets set by Natural England in order to bring the river system into a favourable condition. This is a requirement of the Habitats Regulations. The underlying premise of the Plan is that increases in sewage derived phosphate would be more than offset by reductions from DEFRA's catchment sensitive farming {CSF} initiatives. However, at the beginning of 2018, Natural England and the EA reported that CSF has been much less effective than that which was projected by the NMP modelling and is unlikely to satisfactorily offset the increased level of phosphates from new development". Surface water flooding has been reported many times on the East of Dene site (H2.7), to the west in Grange Lane, to the south along Boreham Road and principally around the Sutton Veny roundabout. This combined with the less effectiveness mitigation is likely to increase the phosphate concentration in the River Avon. Wiltshire Council have yet to successfully manage pollution of the River Avon with respect to the current planning approvals and should not be proposing further harmful development at this time until a SFRA level 2 is completed. Flooding Issue raised Flooding issues on the site and in the local area and the lack of SFRA Level 2 or Surface Water Management Plan. Wiltshire Council response The proposed allocation is located within Flood Zone 1. The Environment Agency has no objection in principle. Any proposals for development of this site should be informed by a site-specific flood risk assessment which should inform design, layout and any mitigation measures required. Proposed change Give greater emphasis to flood and drainage requirements through site specific assessments. EBRAG Comment The only way Wiltshire Council can achieve its legally required duty of managing all forms of flooding in combination across the county is to understand the causes of all floods, record the extent of flooding, where the problem areas are and then devise a strategy to manage these issues. Current national flood risk management policy requires councils to undertake high level flood risk assessments (SFRA 1) and use these to highlight areas needing further assessment; Warminster has been highlighted as needing more. Using the historic flood records and additional flood assessments undertaken in high risk areas such as a SFRA 2,

surface water management plan, flood risk asset maps and floodplain extent maps, Wiltshire Council can then devise an adequate flood management strategy. This has yet to occur. Without the required SFRA 2, or associated supporting plans, Wiltshire Council has (like in Watermead Parish) broken national requirements and proceeded without undertaking an adequately detailed sequential test. Does this make the current development site selection for Warminster illegal? The EA and Wiltshire Council came to a legal understanding when finalising the Core Strategy called a Main Modification which meant the EA would not stop the whole Core Strategy by objecting, only if Wiltshire Council agreed to do the required SFRA 2. This was intended to increase Wiltshire Councils understanding of flood causes in Warminster to ensure safe site selection, which is a legal requirement. The cause of flooding comes from Zones 1 and 2 overwhelming the known limited capacity of the flood infrastructure and the amount of space left in Zone 3, the floodplain, due to previous developments and the addition of flood assets like culverts, bridges and sluices. These increase flood risk across the area but the location and effects have not been mapped yet. Wiltshire Councils response to the issues raised are that the areas being put forward are in Zone 1, the developers will do sufficient flood risk assessments and that the EA will not object. This fails to recognise the EA have a standing objection that Wiltshire Council doesn't have sufficient flood info to make site selection decisions. Developers assessments therefore, when completing their flood risk assessments, will also be based on inaccurate data, so any flood management strategies are extremely suspect. Heritage Assets Issue raised Potential harmful impacts on heritage assets (including Bishopstrow Conservation Area and listed buildings surrounding the site). Wiltshire Council Proposed change. Heritage Impact Assessment to ensure appropriate consideration is given to the significance of heritage assets and their settings. EBRAG Comment The proposed changes do not adequately reflect the comment (ID 1646) from Historic England - "There is a risk to the significance of several affected heritage assets including a Conservation Area, listed buildings and the wider historic landscape setting. No doubt this site will be of considerable archaeological interest. Is the local authority able to confirm it is satisfied that it is appropriate to undertake an archaeological assessment at the application stage that would allow an appropriate response where necessary as a result of the findings? See relevant national policy. Greater certainty/clarity is required re the degree of harm; the strategic layout and form of future development in response to this context. This is sensitive site and difficult to access and as it is a pivotal issue in relationship to the principle it needs to be resolved at the Plan stage and not left to any future application. A field boundary/Jane divides the site north south and is a strong characteristic feature". The Wiltshire Council proposed changes only reflect the actions that would be carried out for any development site to designated and non-designated heritage consistent with national policy. It does not reflect the quantity of heritage assets affected, archaeological interest, historic setting and the degree of harm that development would produce. As stated by Historic England in their comment this is a sensitive site. 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	<p>employment, relies on the employment area being developed to support the needs of the WUE. Wiltshire Council and Warminster Town Council have both recognised that Warminster is unusual in that more people commute out of town for work than are employed within the town boundaries. The main towns for employment near Warminster are Bath, Westbury, Trowbridge, Freme and Salisbury. With the exception of Salisbury, all of these would involve households from H2. 7 commuting through Warminster Town Centre. It therefore will contribute to Warminster's existing current traffic problems at peak times. EBRAG Overall Conclusion. Given the above information on landscape, pollution, flooding, heritage assets, infrastructure, access and employment the local community feel that if the sustainability assessment was repeated for this site against the objectives, it would have produced a different result. The site would have been classified as having major adverse effects and so would not have been considered suitable for selection. The local community believe that the H2.7 East of Dene (Home Farm) site should be removed from the proposed plan.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



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<b>Comment ID:</b>	435	<b>Consultee</b> Chairman East Boreham Residents Action Group (EBRAG)	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 706891		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC78				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>The local community believe that the H2.7 East of Dene (Home Farm) site should be removed from the proposed DPD. The reasons are attached by separate sheet to the document. [see below]. The views represented in this paper are that of the local East Boreham community submitted on their behalf by the East Boreham Residents' Action Group (EBRAG). The aim is to ensure that development in and around East Boreham is sustainable. EBRAG formed in 1980, but still retains an active, experienced and knowledgeable committee, a data base of some several hundred concerned residents and a website (currently being reconstructed) with over 7,000 hits. EBRAG has held several well attended public meetings, regularly updates local residents on the current situation through email and leaflet drop and has the backing of the local county MP, ward town councillors and clearly the local community. EBRAG has submitted many representations on the Wiltshire Council websites against a speculative development application 16/10502/OUT and the original proposed Wiltshire Council Spatial Planning WHSAP/20 for site H2.7, dated 22nd September 2017. These documents should be read in conjunction with this further submittal. The community feels that the proposed revised changes to PC76, PC77 and PC:78 within the WHSAP for Housing Allocation H2. 7 does not adequately reflect the many representations and specific concerns made on this proposed allocation during the initial and subsequent consultation. The Wiltshire Council changes only repeat the policies in the National Planning Policy Framework (NPPF) that a Planning Authority would be required to follow. The Regulation 22 (1) (c) Report Consultation Statement Appendices M -P (Paragraph 21.74) indicated that 64 representations were received and documents the Wiltshire Council response. The following paragraphs highlight the local communities continued concerns with the lack of proposed changes following that representation. Landscape/ conservation Issues Issues raised Disagreement over potential landscape/conservation impacts and the suitability of parts of H2.7 site to be developed. Wiltshire Council Response Assessment of H2.7 site and the raised concerns by Wiltshire Council officers has led to the conclusion that development should be located primarily within the northwest part of H2.7, where landscape and conservation impacts can be more effectively mitigated. Proposed change by Wiltshire Council following representation None. EBRAG comment The conclusion from the 2017 Landscape Assessment Part stated - "The site contributes to the setting of Bishopstrow Conservation Area, Battlesbury Hill and south eastern edge of Warminster. There are also views through the site from the local PRoW network north towards Battlesbury Hill and south towards the treed Bishopstrow Conservation Area. It would be difficult to mitigate the removal of these features should the site be developed. However, proposed development would be less constrained in the north west of the site due to the proximity of existing development and the lower sensitivity in terms of wider landscape setting and views. Boundaries to development could be planted with groups of trees, copses and individual specimen trees to help mitigate the effect on landscape character and views. The</p>			

northern, south western and eastern parts of the site would be more sensitive to development due to the proximity of the Conservation Area and views north towards Battlesbury Hill. The overall capacity to accommodate change would be moderate -/ow". The Landscape Assessment does not consider the views from Battlesbury however the Heritage Impact Assessment does indicate a potential for - "setting change to Battlesbury Camp hillfort (SM) in vistas to the south from the monument". The landscape associated with this site has not changed since the Planning Inspectors Report into the West Wiltshire District Plan in 2004 who, when considering the location of Warminster's Settlement Boundary, commented - "/ saw that the land mostly comprises arable fields, with similar fields to the north, together with a few cottages and other houses (some set in trees) and bounded by lanes or roads, to the east, west and south. Although there is urban development immediately to the west (across Grange Lane), the area has a pleasant and obviously rural appearance and is very much on the edge of Warminster. From my observations from local footpaths to the north, west and east of the area and from Battlesbury Hill, I consider that the land relates well in visual terms to the open countryside to the north and east, forming an integral part of the countryside east of the town. I accept that a high stone wall and cottages fronting Boreham Road impact on any meaningful visual relationship with the countryside to the south, other than when seen from the Hill top. However, in view of the open-ness of the land and its linkage with other open land to the east and north (and especially Battlesbury Hill), I consider that the town policy limit hereabouts should be drawn along the eastern edge of the denser development fronting The Dene, St George's Close and (the southern part of) Grange Lane". The current Heritage Impact Assessment (LUC) provides a much more comprehensive and detailed assessment including the effects of limiting development in the north. This document details much more significant effects than were considered by the Sustainability Analysis and therefore should be reviewed in entirety before any decisions are reached. River Avon SAC Issues raised The need to protect biodiversity (River Avon SAC and 5551, local wildlife). Wiltshire Council Response Additional wording is proposed to be added to the supporting text to ensure that the policy adequately addresses the need to protect the River Avon SAC. EBRAG Comment Although Wiltshire Council Response indicates that a wording change is proposed, EBRAG cannot identify any change in PC76, PC77 and PC78 that relates to change. The main problem affecting the River Avon SAC is phosphate concentration. To this end Wiltshire Council has a Nutrient Management Plan (NMP) to identify appropriate and proportionate mitigation measures. However, the Planning . Officer's report on application 17-01463-FUL to the Strategic Planning Committee 15th August 2018 stated - "The aim of the NMP is to bring phosphate concentrations in the River Avon SAC down to the conservation targets set by Natural England in order to bring the river system into a favourable condition. This is a requirement of the Habitats Regulations. The underlying premise of the Plan is that increases in sewage derived phosphate would be more than offset by reductions from DEFRA's catchment sensitive farming {CSF} initiatives. However, at the beginning of 2018, Natural England and the EA reported that CSF has been much less effective than that which was projected by the NMP modelling and is unlikely to satisfactorily offset the increased level of phosphates from new development". Surface water flooding has been reported many times on the East of Dene site (H2.7), to the west in Grange Lane, to the south along Boreham Road and principally around the Sutton Veny roundabout. This combined with the less effectiveness mitigation is likely to increase the phosphate concentration in the River Avon. Wiltshire Council have yet to successfully manage pollution of the River Avon with respect to the current planning approvals and should not be proposing further harmful development at this time until a SFRA level 2 is completed. Flooding Issue raised Flooding issues on the site and in the local area and the lack of SFRA Level 2 or Surface Water Management Plan. Wiltshire Council response The proposed allocation is located within Flood Zone 1. The Environment Agency has no objection in principle. Any proposals for development of this site should be informed by a site-specific flood risk assessment which should inform design, layout and any mitigation measures required. Proposed change Give greater emphasis to flood and drainage requirements through site specific assessments. EBRAG Comment The only way Wiltshire Council can achieve its legally required duty of managing all forms of flooding in combination across the county is to understand the causes of all floods, record the extent of flooding, where the problem areas are and then devise a strategy to manage these issues. Current national flood risk management policy requires councils to undertake high level flood risk assessments (SFRA 1) and use these to highlight areas needing further assessment; Warminster has been highlighted as needing more. Using the historic flood records and additional flood assessments undertaken in high risk areas such as a SFRA 2,

surface water management plan, flood risk asset maps and floodplain extent maps, Wiltshire Council can then devise an adequate flood management strategy. This has yet to occur. Without the required SFRA 2, or associated supporting plans, Wiltshire Council has (like in Watermead Parish) broken national requirements and proceeded without undertaking an adequately detailed sequential test. Does this make the current development site selection for Warminster illegal? The EA and Wiltshire Council came to a legal understanding when finalising the Core Strategy called a Main Modification which meant the EA would not stop the whole Core Strategy by objecting, only if Wiltshire Council agreed to do the required SFRA 2. This was intended to increase Wiltshire Councils understanding of flood causes in Warminster to ensure safe site selection, which is a legal requirement. 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<b>Comment ID:</b>	436	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126309	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC73				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Wiltshire Housing Site Allocation Plan Opposition to Site 3565 For the attention of the GOVERNMENT INSPECTOR Throughout the planning process Wiltshire Council has consistently broken a number of its Core Policies and ignored legislation and governmental agencies reports and recommendations directly pertaining to Site 3565. There has been widespread public condemnation of Site 3565 from the local community. Factual supporting evidence supplied by members of the public containing reports from government agencies directly linked to the site has been disregarded throughout the consultation process. Submissions made by the public as part of the process have been significantly edited by Spatial Planning in its final publication. Trowbridge Council has consistently opposed all plans to develop the site. Despite an exhaustive list of significant arguments backed and reinforced by government legislation against the development of 3565, the site remains in Wiltshires Housing Site Allocation Plan. Arguments against the development of Site 3565 with supporting evidence are as follows: The site has been widely recognised as an area of archaeological landscape of considerable importance. Furthermore, Natural England in possession of the full facts pertaining to the site, concluded, we advise that the plan is unsound. The proposed development is adjacent to important heritage sites and recognised by government agencies as being of significant importance. Trowbridge Council and Parish Councils, notably Southwick and North Bradley have consistently opposed any proposal for development. Moreover in Wiltshire Councils Core Policy 29 and the supporting text (paragraph 5.150) of the WCS, it clearly states that surrounding villages should have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. Development of the site would contravene this policy and neighbouring villages would merge with Trowbridge thus losing their distinct individuality affording no separation in its outcome. Site 3565 has been recognised as of significant importance as referenced in the Listed Buildings and Conservation Areas Act 1990, as it encompasses the Grade 11* Listed Southwick Court Farm and farmstead with its medieval moat and post medieval water meadow system. The 1990 Act gives special regard when considering land for development and the need to take account of the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (S16 and 66). Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation. Significance can be harmed or lost through development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Core Policy 58 of the Wiltshire Core Strategy echoes the above national policy in seeking the protection, conservation and, where possible, enhancement of listed buildings. Any development of the site would significantly undermine the integrity of the listed buildings and archaeology and subject it to significant harm. Southwick Court lies immediately to</p>			



the south of the proposed development. The County Planning Archaeologist reported in June 2017 that by putting 180 houses will have an impact on a number of heritage assets. The preservation and conservation of the site has already been significantly compromised in recent years by the installation of a Solar Farm. This has already impacted on the managed landscape and associated buildings related to the heritage site. Recommendations, findings and conclusions documented in a Sustainability Assessment Heritage Impact Assessment of the site have been ignored by Wiltshire Council. The report concluded by highlighting The designated assets are of high importance, reflecting their national significance Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation. Significance can be harmed or lost through development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Core Policy 58 of the Wiltshire Core Strategy echoes the above national policy in seeking the protection, conservation and, where possible, enhancement of listed buildings. Bramble Farm sits within Site 3565 under a tenancy arrangement. Cattle graze on the fields and winter feed is an invaluable by product that ensures the farm is economically viable. Development of the land would make the farm unsustainable by removing fields that provide essential winter feed. The site has historically provided recreational and leisure pursuits for the local community. Three public footpaths are officially recognised on OS maps and an additional two are in the process of being added as they meet the criteria for being in use for an excess of thirty years. Wiltshire Core Policy clearly states that public rights of way network will be protected from development for other land uses Development of the site would directly impact on the landscape potentially blocking or removing public footpaths and rights of way. This clearly contravenes Wiltshires Core Policy. In addition, Natural England has stated that they are unsure how the arguments surrounding public rights of way, open spaces and common land have been duly considered in Wiltshire Councils Planning Allocation Plan. Site 3565 encompasses hedgerows that fulfil the criteria of Important as set out in the 1997 Hedgerow Act. The hedgerows date back to at least 1795 as can be evidenced on an Andrews and Dury map of Wiltshire dating back to this year. Development of the site would necessitate cutting through Important hedgerows. The Act clearly and unreservedly states that a hedgerow must not be cut through unless it is for the defence of the realm or public safety and by no more than 20 metres wide, where no other means of access is available and then it must be immediately made good. Any access to Site 3565 would necessitate the hedgerow being cut through and that would contravene criteria set out by DEFRA. In addition to contravening government legislation, it must be noted that the hedgerows form natural habitats for endangered species, notably Bechstein Bats and water voles. Any disruption to the hedgerows would impact detrimentally on these creatures. As custodians it is our duty and responsibility to ensure the continuation of protected species wherever possible and government legislation is in place to ensure local governments adhere to this. To cut through hedgerows in the certain knowledge that these endangered species are present is unacceptable and contravenes government legislation presented by DEFRA. Furthermore any cut through would involve cutting down trees that have tree protection orders in place. Wiltshire Council has been made aware that the site encompasses both Level 2 and 3 flood plains. The area is bisected by the Lambrok Stream and the Lambrok Brook. The site has historically and regularly experienced episodes of significant flooding. This has directly impacted on the North South axis of the site where surface water and raw sewage has been forced out of drains into existing housing developments gardens adjacent to the proposed site. The land consistently suffers from excessive surface water. Further development would exacerbate and increase incidents of flooding and would invalidate the Environment Agency requirement for a lifetime certainty of freedom from flooding. NPPF regulations state that development should be away from flood plain areas and associated drainage and this is further supported by Natural England. Should Site 3565 be developed, flooding will inevitably increase, thereby significantly impacting on current housing developments built in the 1970s, 1980s and 1990s alongside newly built properties under the current proposals whilst further undermining and damaging important heritage sites situated on and within the site. This will directly contravene the Environmental Agency documentations. To gain access to the site would incur breaking through Important and protected hedgerows and protected trees, dissecting flood plains and or building a bridge/culvert from the A361. None of which is either legal or financially viable. Given the number of brown sites currently available for development in Trowbridge, most notably the old Bowyers site and mindful that planning permission for a significant number of houses has already been granted

	<p>by Wiltshire Council eg: at West Ashton Court, the need to develop a significant heritage site with legal protection is unwarranted. We must preserve our heritage sites and be mindful of any development that significantly under minds their integrity and importance for future generations. To develop Site 3565 would be illegal and unsustainable under current legislation. The site is presented as being of marginal sustainability and fails many of the tests set up for sustainability criteria, most notably access to an infrastructure supporting health, education and transport links. Serious concerns have been raised in the HIA report pertaining to these matters. Thank you for taking the time to consider my arguments as listed above. Given the strength and significance of the legal arguments stated within and supplied by government agencies, I hope Site 3565 will be removed from Wiltshires Housing Site Allocation Plan following your inspection.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	437	<b>Consultee</b> Director Jack Jarrett Architects	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187771		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	CATP/19				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Consultation on the draft Wiltshire Housing Site Allocations Plan - Sites 321 and 738 To whom it may concern I write with the following comments on the proposed developments noted above, which I trust the above may be of use: Quantity of houses Bratton is deemed a large village under Core Policy 32 of the Wiltshire Core Strategy (WCS). Paragraph 4.15 states development in large villages 'will predominantly take the form of small housing (defined as sites involving fewer than 10 dwellings). Both sites propose significantly greater than 10 dwellings - Site 321 proposes 35, and Site 738 proposes a further 22. Both would therefore be considered as major applications. I am unaware of any justification for the increased demand for housing in Bratton, and welcome any further information on this. Table 5.19 of the WCS states 55 more houses are needed to be provided by 2026 across the remainder of the Westbury Community Area. The proposed sites in Bratton would exceed this, irrespective of any other proposed developments across the community area. It would be illogical for Bratton to absorb this need in its entirety, especially given that Dilton Marsh (for example) has better access to both employment and transport links. The proposed development would see a 10-15% increase in dwellings (there is a discrepancy between Wiltshire Councils and Bratton Parish Councils figures for the number of existing houses (819 vs 506)), which is a significant addition to the village, with no proposed employment or any other additional services. The significance either of these developments will have upon the village should also ensure a thorough and comprehensive public consultation and engagement is undertaken to ensure the appropriateness of any development. Location of development 'There is a general presumption against development outside the defined limits of development of Large Villages (WCS 4.16). I believe both sites currently lie outside the Bratton settlement boundary (I appreciate this has recently been the subject of a proposed revision), and would also have a significant impact on the setting of both the village and the surrounding countryside. Density of development I appreciate the need to maximise developable plots of land, but the proposed density of both developments should take into consideration the surrounding built context (NPPF paragraphs 122-123). Both sites densities exceed densities seen elsewhere in the village, and are approximately 1.5x greater than the adjacent Court Orchard estate, which itself has a higher density than elsewhere in the village. This would amount to an incongruous grain, especially considering that both sites lie on the the boundary of the village (not the centre, where density would typically increase). Given these sites would in effect form the western entrance to the village, care should be taken to ensure appropriate and sensitive development. Sustainability CP1 (WCS) states that development at Large [ ] Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. NPPF paragraphs 72 &amp; 78 promote developments which support and aid a sustainable community. Both sites would only provide housing (potentially in excess of what is needed), and do not provide any greater</p>			

	<p>community benefit. Highways Bratton has few viable alternatives to transport beyond the use of private car. Further, with little local employment, and typically 2 cars per household, development would see a significant increase in vehicular use, with both sites only able to access the B3098. Again, this would show no great reason for the proposed increased in density, which is typically applied where there is less reliance on private cars. These developments would only further increase reliance on the car, contrary to CP34.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	438	<b>Consultee</b> That Way Limited  <b>Person ID:</b> 1187878	<b>Agent</b> Director Southern Planning Practice  <b>Person ID:</b> 1187879	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
				<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC27				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC27: Amendments to Table 4.11 Support the figures shown for the indicative requirement for housing development 2006-2026 in the Rural Areas which shows there is still a short fall of 15%. These figures are considered sound and legally compliant. Figures recognise that there are still housing needs in these rural areas that need to be met.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	439	<b>Consultee</b> That Way Limited	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187878		<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC3				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC3: Amendments to Table 4.1 My client supports the increase in the minimum to be allocated for the South Wiltshire HMA from 594 to 1,331 The proposed changes have been positively prepared to seeks to meet the South Wiltshire HMA objectively assessed needs. The increased fugure takes into account that the 'Developable Commitments for 2017-2016' as previously set out in the Wiltshire Housing Site Allocations Plan Submission Draft Plan July 2018 have not been met as originally envisaged. The proposed increase is therefore justified.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	440	<b>Consultee</b> That Way Limited	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187878		<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC41				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	SBR PC41: Winterslow My client supports the some of the proposed changes to the pre-submission Winterslow Settlement Boundary in particular Old Manor Farm and part of the land to the rear (south west), West Winterslow and the settlement boundary HSAP Submission July 2018 as shown. These changes to the settlement policy boundary are considered to be sound as it is promotes sustainable patterns of development in accordance with paragraph 138 of the National Planning Policy Framework (NPPF). Winterslow and West Winterslow has a good range of local community facilities including a village shop, church, primary school, 2 public houses and village hall therefore the changes to increase the size of the settlement boundary are supported as there is potential for growth. According to PC27: Amendments to Table 4.11 local housing needs for the South Wiltshire Community Area and the rural areas of the South Wiltshire Housing Market Area have not been met. Therefore new housing development and SHLAA sites at Winterslow and other South Wiltshire Commnuity Areas should still be considered to meet the housing need as there is no Neighbourhood Plan for the area.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	441	<b>Consultee</b> That Way Limited	<b>Agent</b>  <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187878		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	SBR PC41				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	SBR PC41: Winterslow My client does not support all the proposed changes to the pre-submission Winterslow Settlement Boundary in particular the exclusion of land at to the rear (south west) of Old Manor Farm, West Winterslow in the settlement boundary HSAP Submission July 2018 plan as shown. The exclusion of this land outside of the settlement policy boundary is considered to be unsound as it does not promote sustainable patterns of development in accordance with paragraph 138 of the National Planning Policy Framework (NPPF). This area of land runs parallel with a public footpath and excluding it does not run with the natural boundaries of the site. According to PC27: Amendments to Table 4.11 local housing needs for the South Wiltshire Community Area and the rural areas of the South Wiltshire Housing Market Area have not been met. Therefore new housing development and SHLAA sites at Winterslow and other South Wiltshire Community Areas should still be considered to meet the housing need as there is no Neighbourhood Plan for the area. This area of land excluded could meet some of that need. See original representation for location plan				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	442	<b>Consultee</b> Planning Policy Officer New Forest District Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 979508		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Update to Habitats Regulations Assessment Addendum (September 2018) (EXAM/03)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p><b>NEW FOREST DISTRICT COUNCIL</b> <b>NOVEMBER 2018</b></p> <p><b>RESPONSE TO WILTSHIRE COUNCIL'S HOUSING SITE ALLOCATIONS PLAN – FOCUSSED CONSULTATION ON THE SCHEDULE OF PROPOSED CHANGES AND REVISED SUSTAINABILITY APPRAISAL (27 SEPTEMBER to 9 NOVEMBER 2018)</b></p> <p><u>Recreational Impacts on the New Forest European Sites (New Forest SPA, SAC, Ramsar)</u></p>				

<p><b>Assessment Addendum (September 2018).</b></p>	<p>1.1 The majority of the issues identified and the changes outlined are appropriate and address matters that are rightfully for Wiltshire to take a view on. However, there remain some outstanding issues in the (South Wiltshire) Downton area that have implications that could affect the New Forest European nature conservation sites, described briefly below.</p> <p>1.2 The Conservation of Habitats and Species Regulations 2010 require development to avoid harmful impacts on the integrity of protected sites, and to ensure that appropriate mitigation measures are in place where likely significant effects have been identified.</p> <p>1.3 Wiltshire Council produced a Habitats Regulations Assessment (HRA)[1] for its Core Strategy adopted in 2015. It was concluded that the Core Strategy includes sufficient policies to avoid or mitigate potential adverse effects on European nature conservation sites. It noted that further HRA would be required for the Site Specific Allocations DPD on this issue (HRA, p.9).</p> <p>1.4 The Housing Site Allocations Plan now proposes 190 dwellings for the Downton area which will be within 5km of the New Forest SPA and will have a recreational impact on the New Forest Nature 2000 sites.</p> <p>1.5 The HRA fails to acknowledge the recreational impacts that will arise from development so close to the New Forest Natura 2000 sites. It further fails to address the adverse impacts through appropriate mitigation measures. The Plan should set out what form the mitigation will be required in relation to any sites identified so that developers can proceed without adverse impacts on the New Forest European sites. The Wiltshire Local Plan or supporting documents may provide some of this information, in which cross referencing may be appropriate. But to be silent on Natura 2000 habitat impact avoidance when the issue is identified in the HRA would be a significant soundness issue and would not comply with the conservation of the New Forest European Sites.</p> <p>1.6 This has already been acknowledged in the adopted Downton Neighbourhood Plan (2016) which states that: <i>“There is a risk that new housing in the Downton Parish Neighbourhood Plan Area would lead to impacts on the New Forest Special Protection Area as a result of increased recreational disturbance on ground nesting birds. Wiltshire Council is committed to preparing a New Forest Mitigation Strategy to deliver measures to offset the impacts. However, until the strategy is complete, the Neighbourhood Plan notes developers must comply with CP50 of the Core Strategy by providing bespoke measures to demonstrate their proposals would have no adverse effect on the SPA.”</i> (p.28).[2]</p> <p><u>Conclusion</u></p> <p>1.7 NFDC objects to the commitment to 190 dwellings at Downton without ensuring the required mitigation to avoid adverse effects on the integrity of the New Forest European sites is provided. It is NFDC’s view that the proposed housing will lead to likely significant effects on the New Forest European sites unless provision for mitigation is incorporated into the Site Allocations Plan. The Plan currently fails to set out provision for mitigation. The objection is made on the grounds that as currently drafted the Plan is contrary to the Habitats Regulations.</p> <p>[1] <a href="http://www.wiltshire.gov.uk/wcs-habitats-regulations-assessment-feb-2012.pdf">http://www.wiltshire.gov.uk/wcs-habitats-regulations-assessment-feb-2012.pdf</a></p> <p>[2] <a href="http://www.wiltshire.gov.uk/1-downton-neighbourhood-plan-12102016.pdf">http://www.wiltshire.gov.uk/1-downton-neighbourhood-plan-12102016.pdf</a></p>		
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	

<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	443	<b>Consultee</b> Planning Policy Officer New Forest District Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 979508		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Update to Habitats Regulations Assessment Addendum (September 2018) (EXAM/03)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p><b>NEW FOREST DISTRICT COUNCIL</b> <b>NOVEMBER 2018</b></p> <p><b>RESPONSE TO WILTSHIRE COUNCIL'S HOUSING SITE ALLOCATIONS PLAN – FOCUSSED CONSULTATION ON THE SCHEDULE OF PROPOSED CHANGES AND REVISED SUSTAINABILITY APPRAISAL (27 SEPTEMBER to 9 NOVEMBER 2018</b></p> <p><u>Recreational Impacts on the New Forest European Sites (New Forest SPA, SAC, Ramsar)</u></p>				



**Assessment Addendum  
(September 2018).**

1.1 The majority of the issues identified and the changes outlined are appropriate and address matters that are rightfully for Wiltshire to take a view on. However, there remain some outstanding issues in the (South Wiltshire) Downton area that have implications that could affect the New Forest European nature conservation sites, described briefly below.

1.2 The Conservation of Habitats and Species Regulations 2010 require development to avoid harmful impacts on the integrity of protected sites, and to ensure that appropriate mitigation measures are in place where likely significant effects have been identified.

1.3 Wiltshire Council produced a Habitats Regulations Assessment (HRA)[1] for its Core Strategy adopted in 2015. It was concluded that the Core Strategy includes sufficient policies to avoid or mitigate potential adverse effects on European nature conservation sites. It noted that further HRA would be required for the Site Specific Allocations DPD on this issue (HRA, p.9).

1.4 The Housing Site Allocations Plan now proposes 190 dwellings for the Downton area which will be within 5km of the New Forest SPA and will have a recreational impact on the New Forest Nature 2000 sites.

1.5 The HRA fails to acknowledge the recreational impacts that will arise from development so close to the New Forest Natura 2000 sites. It further fails to address the adverse impacts through appropriate mitigation measures. The Plan should set out what form the mitigation will be required in relation to any sites identified so that developers can proceed without adverse impacts on the New Forest European sites. The Wiltshire Local Plan or supporting documents may provide some of this information, in which cross referencing may be appropriate. But to be silent on Natura 2000 habitat impact avoidance when the issue is identified in the HRA would be a significant soundness issue and would not comply with the conservation of the New Forest European Sites.

1.6 This has already been acknowledged in the adopted Downton Neighbourhood Plan (2016) which states that: *“There is a risk that new housing in the Downton Parish Neighbourhood Plan Area would lead to impacts on the New Forest Special Protection Area as a result of increased recreational disturbance on ground nesting birds. Wiltshire Council is committed to preparing a New Forest Mitigation Strategy to deliver measures to offset the impacts. However, until the strategy is complete, the Neighbourhood Plan notes developers must comply with CP50 of the Core Strategy by providing bespoke measures to demonstrate their proposals would have no adverse effect on the SPA.”* (p.28).[2]

Conclusion

**1.7 NFDC objects to the commitment to 190 dwellings at Downton without ensuring the required mitigation to avoid adverse effects on the integrity of the New Forest European sites is provided. It is NFDC’s view that the proposed housing will lead to likely significant effects on the New Forest European sites unless provision for mitigation is incorporated into the Site Allocations Plan. The Plan currently fails to set out provision for mitigation. The objection is made on the grounds that as currently drafted the Plan is contrary to the Habitats Regulations.**

[1] <http://www.wiltshire.gov.uk/wcs-habitats-regulations-assessment-feb-2012.pdf>

[2] <http://www.wiltshire.gov.uk/1-downton-neighbourhood-plan-12102016.pdf>

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	444	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Unfortunately I cannot get through the labyrinth of guff re the above on the official site nor indeed get into a position of responding on the correct forms...I wonder if this is intended to frustrate residents? It is also quite irritating to have to repeat previously aired objections! Anyway...my concerns are none-the-less relevant for having to be represented in this email as follows:- Concerns:- Roadways...unable to cope with more traffic and are generally in terrible condition now.They have deteriorated badly this year, Tetbury Lane in particular since the 10 houses went up. Drainage...additional housing in the fields backing on to the streams will only cause more problems and exacerbate the flooding risks. We do not want any further repeats of the two previous flood events. Indeed, any further development to the West and North of the village...ie off either Tetbury Lane or Tuners Lane will only serve to increase issues for all those residents in the Northern part of the village....and indeed the older and more significant village properties in terms of flood risk. Tuners Lane Ford is a low point and natural water confluence...both from the West fields and North fields, running down the A429. Services...school is at capacity and there is no shop. Extra housing will significantly increase car journeys in and out of the village with attendant heightened risks to all in terms of accidents with traffic backing up on the far too busy A429. The development already underway (10 houses in Tetbury Lane) is already quite frightening. The houses more than dominate that part of Crudwell; they appear monstrously large and have changed adversely the aspect of Tetbury Lane. Any more would simply make matters worse. Amenity Land....the village is served by many walking paths around the fields; further developments will take these paths away from residents. Not satisfactory. Summary....no further houses in Crudwell please. Certainly not the proposed extension to the existing horrible Tetbury Lane Development. Any development...not that I think any more is warranted for Crudwell...needs to be on the East side of village and South of Church Fields...ie on the Carpenters Yard and Crudwell garage sites.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			

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<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	445	<b>Consultee</b> C/O Agent Hallam Land Management	<b>Agent</b> Director Savills	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 645345	<b>Person ID:</b> 1138525	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC76				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[SEE ATTACHMENT FOR FULL REPRESENTATION] Land East of the Dene, Warminster (Site: H2.7) Representations to Focussed Consultation on the Wiltshire Housing Site Allocations Plan 1. Introduction These representations have been prepared by Savills on behalf of Hallam Land Management (HLM), in response to the Focussed Consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan. HLM control an area of land approximately 11.05 hectares in size adjacent to the eastern edge of Warminster, a proportion of which is allocated within the Draft Plan under Policy H2.7 (East of the Dene, Warminster) for residential development. The land has been promoted throughout the Site Allocations DPD process, most recently through the Pre-Submission Draft Plan in September 2017, seeking an allocation for residential development. The site has also been submitted previously to the SHLAA. A copy of the Site Location Plan is attached at Appendix 1. Extensive information on the suitability of the site, and the technical evidence supporting the pending outline planning application for development of up to 135 residential dwellings (16/10502/OUT), can be viewed in the comprehensive representations submitted in September 2017. These representations solely respond to the Proposed Changes which have been published by Wiltshire Council, and some of the associated evidence base documents. Comments on Policy H2.7 are made as a result, as are proposed changes to the policy wording. Overall, whilst we fully support the allocation of the site in principle and welcome the Councils recognition that the site is suitable for development, we remain concerned that the current wording and allocation boundary for Policy H2.7 will unnecessarily restrict the delivery of development upon the site. We have therefore proposed changes to the wording of draft Policy H2.7 to address these concerns and ensure that the policy is sound and that a well-planned, high-quality residential development can come forward. These representations are structured as follows: Section 1: Introduction Section 2: Comments on Schedule of Proposed Changes Section 3: Comments on Associated Evidence Base Section 4: Response to draft Policy H2.7 (East of the Dene, Warminster) Section 5: Conclusion 2. Schedule of Proposed Changes Since the September 2017 Consultation, discussions between HLM, Historic England and Wiltshire Council have progressed in regard to the nature of the proposals on the site. These discussions have been informed by the detailed Archaeological and Heritage Assessments which have been submitted as part of the pending planning application for the site. Despite this dialogue, there remain inaccuracies and inconsistencies within the supporting text relating to draft Policy H2.7. Proposed Change ref: PC76 suggests a change to paragraph 5.89, to read: Bishopstrow Conservation Area encloses the site on two sides and there are a number of historic buildings within close proximity to the site boundary, including Bishopstrow House (Grade II listed) and its designed landscape, as well as Bishopstrow Home Farm (nondesignated heritage asset). The archaeological potential on the site is high. The main access will be from Boreham Road but the south-west part of the site is considered to</p>				

be unsuited to built development because of its sensitivity in heritage and landscape terms. This land may remain in agricultural use or becomes either formal or informal open space, but will be undeveloped so the character of the area continues to preserve the significance of heritage assets. (underlining proposed insertion). We are concerned with the inaccuracy of the proposed insertion of The archaeological potential on the site is high , which does not appear to be based on up to date factual evidence. Trial trenching, undertaken on site as part of the pending planning application (16/10502/OUT), has confirmed that no significant archaeological remains exist. The trial trenching was undertaken at the request of the Councils Archaeological Officer (Rachel Foster) through consultation on the planning application. A summary report was then prepared and submitted to the Council, and a response received from the Councils Archaeological Officer on 28 April 2017 and 30 May 2017 confirming that the content of the report is acceptable and that there is no evidence to indicate significant remains which would preclude development of the site, and that necessary mitigation measures can be secured by condition. Copies of the responses from the Councils Archaeological Officer confirming this position can be found at Appendix 2. Therefore, given paragraph 5.89 is contrary to the evidence obtained on site, and agreed with the Councils archaeological officer, we propose that the wording The archaeological potential on the site is high is removed. In addition, for the reasons explained in our previous representations, we maintain our objection to the wording in paragraph 5.89 which states that the south-west part of the site is considered to be unsuited to built development because of its sensitivity in heritage and landscape terms . Whilst we acknowledge the need for any development on the site to conserve the significance of the nearby designated and non-designated heritage assets, we disagree that the supporting text to the policy should specify that the south west part of the site is unsuited to development. It would be premature to come to this conclusion in the absence of a detailed scheme (including potential mitigation measures) which can be assessed for its visual and heritage impacts. To address this matter, we have proposed new policy wording within Section 4 of these representations to emphasise that development proposals for the site are capable of responding to the identified constraints without the need to exclude a significant element of the site. We therefore propose that the wording within paragraph 5.89 but the south-west part of the site is considered to be unsuited to built development because of its sensitivity in heritage and landscape terms , is removed as this matter is addressed by our alternative policy wording.

3. Associated Evidence Base Wiltshire Housing Site Allocations Plan - Sustainability Appraisal Report (Revised September 2018) Paragraph 1.7.42 of the revised Sustainability Appraisal (SA) states that The HRA addendum identifies that the Council has been advised by the Environment Agency and Natural England that it cannot rely on the River Avon Special Area of Conservation Nutrient Management Plan alone, and that new development within the catchment of the Hampshire Avon needs to be phosphate neutral . This is also reiterated within paragraph 8.3.115. No reference is made to the Memorandum of Understanding: River Avon Special Area of Conservation Phosphate Neutral Development Interim Mitigation (May 2018) (HRA/03) which has been prepared and forms part of the supporting evidence base for the Plan. This Memorandum of Understanding describes how each local planning authority will ensure that development is phosphate neutral, and therefore will not have adverse effects upon the integrity of the River Avon Special Area of Conservation (SAC). This will involve working with developers to help develop and implement appropriate phosphate controls and mitigation measures to achieve this, which we support. This should be referenced in, and read alongside, the SA. In addition, paragraph 8.3.2 of the revised SA makes reference to a small number of sites which involve mixed use development to have a master plan and more extensive site specific requirements . When reviewing the sites listed, it is clear that the land East of the Dene is the proposed allocation listed which comprises only residential development and not a mix of uses. The other sites listed in paragraph 8.3.2 include other uses such as employment, education or community uses in addition to the residential proposed. To address this inaccuracy, it is therefore requested that the land East of the Dene, Warminster is removed from this list within the SA given that the draft Plan proposes only residential development on the site, and not mixed use. It is also noted that paragraph 8.3.105 includes the insertion of a reduced site capacity figure for land East of the Dene, Warminster, including the words to approximately 100 dwellings . As set out in our previous representations in September 2017, the pending planning application proposals (16/10502/OUT) demonstrate that, even with a significant over-provision of open space and a sensitive response to the constraints within the application masterplan, the site has the potential to deliver a quantum of development in excess of 100 dwellings. Therefore, and as

suggested within Section 4 of these representations, it is considered that the capacity should be stated as approximately 100-130 dwellings, and we therefore request a change to this part of the SA as a result. Annex A: Proposed Changes to figures in Section 4: Housing Delivery Strategy

This document presents the updated housing delivery figures for Warminster, consistent with those contained in the latest Housing Land Supply Statement (March 2018). It is interesting to note that even when taking into account the completions up to 2017 and developable commitments up to 2026, there is an anticipated residual of 165 dwellings against the housing requirement for the town. It is therefore significant that such a residual requirement is anticipated, even after the proposed allocations are taken into account. In this context it is important that those sites which are allocated for residential development, including Land East of the Dene, deliver development which maximises the number of homes having regard to the environmental constraints of the site. We will therefore continue to work with the Council throughout the examination to fully support this proposed allocation.

4. Response to draft Policy H2.7 (East of the Dene, Warminster) We strongly support the allocation of the Land East of the Dene as an entirely appropriate and suitable option for future development. However, we continue to have significant concerns over the scope and form of draft Policy H2.7, which, in its current form is considered to have the potential to unnecessarily restrict the delivery of the site and stifle the masterplanning and placemaking process. No changes have been proposed as part of this consultation to the main policy wording for H2.7, and therefore our main areas of concern, as set out in the September 2017 representations, are: 1. Reference to 2ha of undeveloped land to be located in the south west part of the site ; 2. Draft site allocation boundary; 3. Site capacity of 100 dwellings; In addition, through recent discussions with Historic England and during the pre-application process associated with the outline planning application, we are very familiar with the key issues, constraints and opportunities presented by the site. It is our view that these should be captured in the proposed allocation policy wording in a manner which then provides a clear steer to the local authority as to the important matters which need to be considered in determining the planning application. With this objective in mind, we propose replacement policy wording as follows: Policy H2.7 Land east of The Dene, as identified on the policies map, is proposed for residential development. The scale of development will be determined through the masterplanning process associated with the planning application but is anticipated to comprise approximately 100-130 dwellings. Development proposals for the site should respond to the following site specific considerations: 1. Provision of a multi-functional green infrastructure for biodiversity and recreational benefits including well integrated Sustainable Urban Drainage Systems and habitat, pedestrian and cycle connectivity within the site and to the surrounding area. 2. Avoid or minimise adverse impacts on landscape character, as well as providing landscape and environmental enhancements This should include: Retention and protection of existing mature trees of high quality and, as far as possible, important hedgerows ; and The provision of new planting, habitat creation and accessible greenspace; 3. Seek to conserve the significance of the following designated and non-designated heritage assets. As part of the Masterplan the following should be addressed: The southern extent of the allocation and boundary treatment should respond to and respect the setting of Bishopstrow House and its grounds, the relationship with Bishopstrow Conservation Area and retain the views to Battlesbury Hill from the confluence of Boreham Road and the access track/right of way to Home Farm; and The extent of development on the north eastern part of the allocation should respond to the setting of Bishopstrow House and its grounds and the contribution it makes to their setting. 4. In relation to transport, the masterplan should provide: a suitable vehicular access to the site from Boreham Road which is sensitive to the contribution that the wall, through which the access would be taken, makes to the setting of the Conservation Area; a road through the development designed to respect the heritage sensitivities of the locality; and enhanced pedestrian and cycle links from the development. The proposed policy wording is based on the up to date conditions on site, and would, in our view, provide greater flexibility for the future delivery of development to assist in meeting the housing requirement for the town. 5. Conclusion For the reasons outlined in these representations, whilst we strongly support the allocation of the land East of the Dene, Warminster, given the highly sustainable nature of the site, we remain concerned with the policy wording of draft Policy H2.7. Whilst we note the wording of Policy H2.7 is itself not included within the Proposed Changes consultation, we have nonetheless recommended changes to the policy wording for draft Policy H2.7 to include the key principles and development requirements for the site, and ensure that future development is not unnecessarily restricted. The proposed amendments to the policy wording will also ensure that sufficient flexibility exists to ensure that proposals

	<p>for the site have the opportunity to promote development which responds in the most effective manner to the site constraints whilst ensuring such development is deliverable. To ensure consistency with the suggested policy wording, we have also requested some changes to the supporting sub text below Policy H2.7 in the Plan. Aside from the Proposed Changes, these representations have also commented upon the associated evidence base, including the Sustainability Appraisal Report (Revised September 2018) and Annex A: Proposed Changes to figures in Section 4: Housing Delivery Strategy. We trust these representations will be carefully considered and we look forward to working with officers to support the proposed allocation through the examination.</p>		
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<p><b>Supporting documents (Please see Objective)</b></p>	5147881		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	No, the Proposed Change does not meet a previous objection		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	Yes	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	Yes



<b>Comment ID:</b>	446	<b>Consultee</b> Edenstone Homes	<b>Agent</b> Associate Planner Ridge	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1134691	<b>Person ID:</b> 1187893	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Representations on Wiltshire Housing Site Allocations Plan - Focussed Consultation on the Schedule of Proposed Changes and associated evidence documents I write on behalf of my client, Edenstone Homes, on the above consultation which is currently being undertaken by the Council in relation to the Housing Sites Allocations Plan. This consultation has come forward because the Council submitted a Schedule of Proposed Changes with the submission documents which arose as a result of decisions made by Councillors. The Inspector has raised concerns that these proposed changes have not been the subject of Public Consultation which has been undertaken in the correct manner. It is concerning that despite being registered with the Council for updates on planning policy matters, no notification of this consultation was received and we were only made aware of it when monitoring the website for updates on the Examination. As you will be aware, we have made previous representations on the Housing Sites Allocations Plan and we would be grateful if these representations together with all previous submissions are taken into account by the Inspector. Our representations relate to the site known as Land at Ridgeway Farm, Crudwell. The site was previously allocated for housing development in the Draft Wiltshire Housing Site Allocations Plan under reference H2.13. Following the full Council meeting on 10th July 2018, it was resolved to submit the plan to the Secretary of State for Examination with a number of modifications which included: Amending Policy H2 to delete site allocation H2.13 in relation to Crudwell and delete section on Malmesbury Community area at paragraphs 5.111 to 5.114. This appears to have been made on the basis of a purely political decision rather than on planning merits. The minutes of this meeting appear to suggest that good progress has been made on the Crudwell Neighbourhood Plan. PC92 also states that given that good progress has been made on the preparation of the Crudwell Neighbourhood Plan, which seeks to allocate sites, evidence indicates that the Council can defer housing allocation options to be developed through the emerging neighbourhood plan, rather than through the WHSAP process. It is on this basis that the allocation at Ridgeway Farm was removed from the proposed Allocations Plan. This was decided despite the response to the Vice Chair of the Neighbourhood Plan Steering Group at Cabinet on 3rd July, that the proposed allocation should be retained at this stage as the Crudwell Neighbourhood Plan has not yet reached Regulation 14 Stage. Weight to be given to the emerging Crudwell Neighbourhood Plan There are a number of Neighbourhood Plans throughout Wiltshire that are at various stages of advancement. It is our view that those Neighbourhood Plans that are at an early stage should not dictate the overall strategy for strategic plan making within Wiltshire. In discussing the amount of weight that should be applied to emerging Neighbourhood Plans, the Planning Practice Guidance (paragraph 07) states that whilst an emerging Neighbourhood Plan may be a material consideration, the weight to be given to relevant policies in emerging plans depend on their stage of preparation, extent to which there are unresolved objections to relevant policies and the</p>			

degree of consistency of the relevant policies in the emerging plan (Paragraph 216, NPPF 2012). Paragraph 16 of the NPPF (2012) states clearly that Neighbourhood Plans should, inter alia, support the strategic development needs set out in Local Plans. Paragraph 184 goes on to state that the ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area and be in general conformity with the strategic policies of the Local Plan (or, in this case, the Site Allocations Plan). The Crudwell Neighbourhood Plan is at an extremely early stage of development. Despite designating its Neighbourhood Plan area in 2015, progress has been slow and the Regulation 14 stage has not yet been reached. All that is known presently is the intention of a community to prepare a plan. At this stage, there is little content to take into consideration and, importantly, detailed proposals have not been widely consulted on and endorsed by the community. As such, no weight can be given to the Neighbourhood Plan at this stage. The Neighbourhood Plan goes through two stages of formal consultation before it is submitted for examination. The first of these stages is carried out by the Parish and is known as the Regulation 14 stage, the pre-submission consultation. The parish is responsible for carrying out consultation on its draft Neighbourhood Plan. Following this, the plan is formally submitted to the Local Planning Authority (Regulation 15/16), where generally more weight can be attributed. The Neighbourhood Plan is clearly some way off passing examination or passing a referendum vote and being made. It consequently does not form part of the Development Plan and given its limited progress and very early stage of development, no weight should be attributed to it for the purposes of the Wiltshire Site Allocation Plan examination. In summary, it is strongly held that those Neighbourhood Plans at an early stage preparation should not guide the development priorities and needs for the Wiltshire plan area. The Crudwell Neighbourhood Plan, in particular, has not yet been published in draft form and therefore it is a considerable way off from examination and ultimately being made and forming part of the Development Plan. In line with the NPPF, Neighbourhood Plans should be guided by overarching strategic policies that have been found sound and tested thoroughly through the examination process. It is not for Neighbourhood Plans to dictate the overall strategy for the area.

Deliverability of Land at Ridgeway Farm As Officers will be aware, there is currently a full application pending on Land at Ridgeway Farm for the erection of 36 dwellings. This application has been prepared by Edenstone Homes, a housebuilder who are keen to deliver the scheme as quickly as possible following the erection of the first phase of 10 dwellings on the site. The current application has allowed for all technical matters to be explored and addressed in full. This has demonstrated that the site is capable of delivering dwellings in line with the proposed allocation and providing a policy compliant level of affordable housing. As is set out in a letter to the Case Officer from Ridge and Partners dated 23rd October 2018, all technical matters have been or are in the process of being resolved. As it stands, the only concern relating to this application is one of principle and the sites current location outside of the settlement boundary. The revised NPPF 2018, includes a definition on deliverable and states that to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires. In the case of Land at Ridgeway Farm, the site is clearly seen as deliverable for the following reasons: There is a current full planning application pending on the site The site is being promoted by a housebuilder who will develop the site within five years It is situated directly to a site that has been recently completed by the same housebuilder. The inclusion of the site within the draft Allocation Plan following detailed technical analysis by Officers of the Council clearly shows that it is a suitable location for development. The removal of the site from the draft Housing Sites Allocation Plan is clearly politically motivated, given the lack of progress on the Neighbourhood Plan which has been detailed above. The removal of this site from the proposed Allocations Plan raises serious questions over housing land supply within the North and West Market Area. As set out in table 3.4 of Topic Paper 3 - Addendum on Housing Land Supply (July 2018), the Council is unlikely to be able to demonstrate a 5-year housing land supply within the North and West Market area beyond 2024. This inability to be able to ensure that a supply of housing can be provided over the plan period seriously questions the soundness of the proposed Allocations Plan. The Officers Response to Crudwell Parish Councils representation made since the May Cabinet meeting recommends making no change to the Plan and therefore retaining proposed allocation H2.13 Ridgeway Farm, Crudwell in the Plan. This was in the interests of ensuring that the overall housing land supply position across the North and West Housing Market Area is sustained. Questions have already

	<p>been raised in a recent appeal (ref: APP/Y3940/W/17/3187915) over whether the Council is able to demonstrate a 5-year supply currently within this Housing Market Area. This appeal decision is awaited, but the Council considers that a minimum of a 5.25 years supply can be demonstrated. This is only marginally above the required 5 years, and given under delivery in recent years, there needs to be additional allocations and greater flexibility built into the plan to ensure that a supply can be sustained. The above, coupled with the incoming Standard Methodology for calculating Housing Supply, the amended definition of deliverable in the NPPF, together with the uncertainties around the timescales of the Crudwell Neighbourhood Plan, raises significant questions on whether the housing requirements for the Malmesbury Community Area can actually be met. In addition to this, it must be noted that housing figures for Community Areas in the Wiltshire Core Strategy are expressed as indicative requirements and are not a cap on development. Given the Governments intention to significantly boost the supply of housing, plans should be positively prepared, providing sustainable growth in suitable locations. . Concluding Comments The removal of Land at Ridgeway Farm from the proposed Housing Sites Allocation Plan raises serious questions as to whether the submitted plan is sound. The removal of the site was purely a political decision without appropriate evidence to justify that decision. As has been set out within this representation, significant questions must be asked as to how much progress has been made with the Crudwell Neighbourhood Plan. At the time of writing, it has still not been the subject of Regulation 14 consultation despite being designated a plan area in 2015. The lack of progress on the Neighbourhood Plan raises serious concerns over the soundness of the proposed Allocations Plan as the Council have already set out they feel they are unable to demonstrate a 5 year housing land supply in the North and West Market Area beyond 2024 and questions are already being raised over their existing supply. Paragraph 59 of the NPPF clearly sets out the Governments key objective of significantly boosting the supply of housing. It has been demonstrated through the submission of a planning application that Land at Ridgeway Farm is deliverable and there are no technical matters which prevent the site coming forward in the short term. As a result, the proposed allocation should be reinstated. I trust these comments will be taken into consideration during the examination process. In the meantime, if you require any further clarification please do not hesitate to contact me.</p>		
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<b>stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	447	<b>Consultee</b> Edenstone Homes	<b>Agent</b> Associate Planner Ridge	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1134691	<b>Person ID:</b> 1187893	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC19				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Amendments to the settlement boundary The proposed changes, also include further amendments to the settlement boundary for Crudwell. This amendment proposes the inclusion of the linear development along Tetbury Lane and is supported by my client. The Ridgeway Farm site is located between the existing settlement boundary and the proposed July 2018 amendment. As a result, the allocation of Land at Ridgeway Farm would round off this area of Crudwell.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	448	<b>Consultee</b> Edenstone Homes	<b>Agent</b> Associate Planner Ridge	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1134691	<b>Person ID:</b> 1187893	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Malmesbury (July 2018 Submission version) (CATP/07)				
<b>Please give details of why you support or do not support the updates to the</b>	Assessment of other sites in Crudwell				

<p><b>associated evidence documents.</b></p>	<p>We are also aware that the Sustainability Appraisal was revised in September 2018 and this includes the assessment of an additional site in Crudwell, Land at Tuners Lane (Site OM014). This site is assessed on its potential to deliver approximately 40 units. It does not appear that this site has been considered by the Council through previous versions of the Strategic Housing Land Availability Assessment (SHLAA) and we would question the late insertion of the site.</p> <p>At this stage, it appears that no information has been provided to demonstrate that the site is deliverable or that any technical issues can be overcome. Whilst the site has an existing access, one would question the ability to deliver appropriate visibility splays given that the access is located close to a bend in the road. There are also heritage constraints in the vicinity of the site. In comparison, Ridgeway Farm has been considered through an approved detailed planning application (15/03136/OUT) which has now been implemented. The Officer Report accompanying that application acknowledges the Council's Spatial Planning Team confirms the site lies 'adjacent to the village settlement boundary and is well related to the village'. Furthermore, that the site lies in a sustainable location for development within the settlement. There are also no technical issues which cannot be overcome in respect of Ridgeway Farm and therefore the site is deliverable.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Comment ID:</b>	449	<b>Consultee</b> C/O Agent Hallam Land Management	<b>Agent</b> Director Savills	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 645345	<b>Person ID:</b> 389644	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Main Report (EXAM/02A)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p><b>[SEE ATTACHMENT FOR FULL REPRESENTATION]</b></p> <p><u>Land East of the Dene, Warminster (Site: H2.7)</u></p> <p><u>Representations to Focussed Consultation on the Wiltshire Housing Site Allocations Plan</u></p>				

**Assessment Addendum  
(September 2018).**

**1. Introduction**

These representations have been prepared by Savills on behalf of Hallam Land Management (HLM), in response to the Focussed Consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan.

HLM control an area of land approximately 11.05 hectares in size adjacent to the eastern edge of Warminster, a proportion of which is allocated within the Draft Plan under Policy H2.7 (East of the Dene, Warminster) for residential development. The land has been promoted throughout the Site Allocations DPD process, most recently through the Pre-Submission Draft Plan in September 2017, seeking an allocation for residential development. The site has also been submitted previously to the SHLAA. A copy of the Site Location Plan is attached at Appendix 1.

Extensive information on the suitability of the site, and the technical evidence supporting the pending outline planning application for development of up to 135 residential dwellings (16/10502/OUT), can be viewed in the comprehensive representations submitted in September 2017. These representations solely respond to the 'Proposed Changes' which have been published by Wiltshire Council, and some of the associated evidence base documents. Comments on Policy H2.7 are made as a result, as are proposed changes to the policy wording.

Overall, whilst we fully support the allocation of the site in principle and welcome the Council's recognition that the site is suitable for development, we remain concerned that the current wording and allocation boundary for Policy H2.7 will unnecessarily restrict the delivery of development upon the site.

We have therefore proposed changes to the wording of draft Policy H2.7 to address these concerns and ensure that the policy is sound and that a well-planned, high-quality residential development can come forward.

These representations are structured as follows:

- Section 1: Introduction
- Section 2: Comments on Schedule of Proposed Changes
- Section 3: Comments on Associated Evidence Base
- Section 4: Response to draft Policy H2.7 (East of the Dene, Warminster)
- Section 5: Conclusion

**2. Schedule of Proposed Changes**

Since the September 2017 Consultation, discussions between HLM, Historic England and Wiltshire Council have progressed in regard to the nature of the proposals on the site. These discussions have been informed by the detailed Archaeological and Heritage Assessments which have been submitted as part of the pending planning application for the site.

Despite this dialogue, there remain inaccuracies and inconsistencies within the supporting text relating to draft Policy H2.7.

Proposed Change ref: PC76 suggests a change to paragraph 5.89, to read

Bishopstrow Conservation Area encloses the site on two sides and there are a number of historic buildings within close proximity to the site boundary, including Bishopstrow House (Grade II listed) and its designed landscape, as well as Bishopstrow Home Farm (nondesigned heritage asset). The archaeological potential on the site is high. The main access will be from Boreham Road but the south-west part of the site is considered to be unsuited to built development because of its sensitivity in heritage and landscape terms. This land may remain in agricultural use or becomes either formal or informal open space, but will be undeveloped so the character of the area continues to preserve the significance of heritage assets. (underlining proposed insertion).

We are concerned with the inaccuracy of the proposed insertion of “*The archaeological potential on the site is high*”, which does not appear to be based on up to date factual evidence

Trial trenching, undertaken on site as part of the pending planning application (16/10502/OUT), has confirmed that no significant archaeological remains exist. The trial trenching was undertaken at the request of the Council’s Archaeological Officer (Rachel Foster) through consultation on the planning application. A summary report was then prepared and submitted to the Council, and a response received from the Council’s Archaeological Officer on 28 April 2017 and 30 May 2017 confirming that the content of the report is acceptable and that there is no evidence to indicate significant remains which would preclude development of the site, and that necessary mitigation measures can be secured by condition. Copies of the responses from the Council’s Archaeological Officer confirming this position can be found at Appendix 2.

Therefore, given paragraph 5.89 is contrary to the evidence obtained on site, and agreed with the Council’s archaeological officer, we propose that the wording “*The archaeological potential on the site is high*” is removed.

In addition, for the reasons explained in our previous representations, we maintain our objection to the wording in paragraph 5.89 which states that “*the south-west part of the site is considered to be unsuited to built development because of its sensitivity in heritage and landscape terms*”.

Whilst we acknowledge the need for any development on the site to conserve the significance of the nearby designated and non-designated heritage assets, we disagree that the supporting text to the policy should specify that the south west part of the site is ‘unsuited’ to development. It would be premature to come to this conclusion in the absence of a detailed scheme (including potential mitigation measures) which can be assessed for its visual and heritage impacts.

To address this matter, we have proposed new policy wording within Section 4 of these representations to emphasise that development proposals for the site are capable of responding to the identified constraints without the need to exclude a significant element of the site.

We therefore propose that the wording within paragraph 5.89 “*but the south-west part of the site is considered to be unsuited to built development because of its sensitivity in heritage and landscape terms*”, is removed as this matter is addressed by our alternative policy wording.

### **3. Associated Evidence Base**

Wiltshire Housing Site Allocations Plan - Sustainability Appraisal Report (Revised September 2018)

Paragraph 1.7.42 of the revised Sustainability Appraisal (SA) states that *“The HRA addendum identifies that the Council has been advised by the Environment Agency and Natural England that it cannot rely on the River Avon Special Area of Conservation Nutrient Management Plan alone, and that new development within the catchment of the Hampshire Avon needs to be “phosphate neutral”*. This is also reiterated within paragraph 8.3.115.

No reference is made to the ‘Memorandum of Understanding: River Avon Special Area of Conservation Phosphate Neutral Development Interim Mitigation (May 2018) (HRA/03)’ which has been prepared and forms part of the supporting evidence base for the Plan. This Memorandum of Understanding describes how each local planning authority will ensure that development is ‘phosphate neutral’, and therefore will not have adverse effects upon the integrity of the River Avon Special Area of Conservation (SAC). This will involve working with developers to help develop and implement appropriate phosphate controls and mitigation measures to achieve this, which we support. This should be referenced in, and read alongside, the SA.

In addition, paragraph 8.3.2 of the revised SA makes reference to a small number of sites which involve *“mixed use development to have a master plan and more extensive site specific requirements”*. When reviewing the sites listed, it is clear that the land East of the Dene is the proposed allocation listed which comprises only residential development and not a mix of uses. The other sites listed in paragraph 8.3.2 include other uses such as employment, education or community uses in addition to the residential proposed. To address this inaccuracy, it is therefore requested that the land East of the Dene, Warminster is removed from this list within the SA given that the draft Plan proposes only residential development on the site, and not mixed use

It is also noted that paragraph 8.3.105 includes the insertion of a reduced site capacity figure for land East of the Dene, Warminster, including the words *“to approximately 100 dwellings”*. As set out in our previous representations in September 2017, the pending planning application proposals (16/10502/OUT) demonstrate that, even with a significant over-provision of open space and a sensitive response to the constraints within the application masterplan, the site has the potential to deliver a quantum of development in excess of 100 dwellings

Therefore, and as suggested within Section 4 of these representations, it is considered that the capacity should be stated as approximately 100 – 130 dwellings, and we therefore request a change to this part of the SA as a result.

#### Annex A: Proposed Changes to figures in Section 4: Housing Delivery Strategy

This document presents the updated housing delivery figures for Warminster, consistent with those contained in the latest Housing Land Supply Statement (March 2018). It is interesting to note that even when taking into account the completions up to 2017 and developable commitments up to 2026, there is an anticipated residual of 165 dwellings against the housing requirement for the town.

It is therefore significant that such a residual requirement is anticipated, even after the proposed allocations are taken into account. In this context it is important that those sites which are allocated for residential development, including Land East of the Dene, deliver development which maximises the number of homes having regard to the environmental constraints of the site. We will therefore continue to work with the Council throughout the examination to fully support this proposed allocation.

#### **4. Response to draft Policy H2.7 (East of the Dene, Warminster)**

We strongly support the allocation of the Land East of the Dene as an entirely appropriate and suitable option for future development. However, we continue to have significant concerns over the scope and form of draft Policy H2.7, which, in its current form is considered to have the potential to unnecessarily restrict the delivery of the site and stifle the masterplanning and placemaking process. No changes have been proposed as part of this consultation to the main policy wording for H2.7, and therefore our main areas of concern, as set out in the September 2017 representations, are:

1. Reference to *“2ha of undeveloped land to be located in the south west part of the site”*;
2. Draft site allocation boundary;
3. Site capacity of 100 dwellings;

In addition, through recent discussions with Historic England and during the pre-application process associated with the outline planning application, we are very familiar with the key issues, constraints and opportunities presented by the site. It is our view that these should be captured in the proposed allocation policy wording in a manner which then provides a clear steer to the local authority as to the important matters which need to be considered in determining the planning application.

With this objective in mind, we propose replacement policy wording as follows:

*Policy H2.7*

*Land east of The Dene, as identified on the policies map, is proposed for residential development. The scale of development will be determined through the masterplanning process associated with the planning application but is anticipated to comprise approximately 100-130 dwellings.*

*Development proposals for the site should respond to the following site specific considerations:*

1. *Provision of a multi-functional green infrastructure for biodiversity and recreational benefits including well integrated Sustainable Urban Drainage Systems and habitat, pedestrian and cycle connectivity within the site and to the surrounding area.*
2. *Avoid or minimise adverse impacts on landscape character, as well as providing landscape and environmental enhancements This should include*
  - *Retention and protection of existing mature trees of high quality and, as far as possible, important hedgerows ; and*
  - *The provision of new planting, habitat creation and accessible greenspace;*
3. *Seek to conserve the significance of the following designated and non-designated heritage assets. As part of the Masterplan the following should be addressed:*
  - *The southern extent of the allocation and boundary treatment should respond to and respect the setting of Bishopstrow House and its grounds, the relationship with Bishopstrow Conservation Area and retain the views to Battlesbury Hill from the confluence of Boreham Road and the access track/right of way to Home Farm; and*

- *The extent of development on the north eastern part of the allocation should respond to the setting of Bishopstrow House and its grounds and the contribution it makes to their setting.*

4. *In relation to transport, the masterplan should provide:*

- *a suitable vehicular access to the site from Boreham Road which is sensitive to the contribution that the wall, through which the access would be taken, makes to the setting of the Conservation Area;*
- *a road through the development designed to respect the heritage sensitives of the locality; and*
- *enhanced pedestrian and cycle links from the development.*

The proposed policy wording is based on the up to date conditions on site, and would, in our view, provide greater flexibility for the future delivery of development to assist in meeting the housing requirement for the town.

### 5. Conclusion

For the reasons outlined in these representations, whilst we strongly support the allocation of the land East of the Dene, Warminster, given the highly sustainable nature of the site, we remain concerned with the policy wording of draft Policy H2.7.

Whilst we note the wording of Policy H2.7 is itself not included within the Proposed Changes consultation, we have nonetheless recommended changes to the policy wording for draft Policy H2.7 to include the key principles and development requirements for the site, and ensure that future development is not unnecessarily restricted. The proposed amendments to the policy wording will also ensure that sufficient flexibility exists to ensure that proposals for the site have the opportunity to promote development which responds in the most effective manner to the site constraints whilst ensuring such development is deliverable.

To ensure consistency with the suggested policy wording, we have also requested some changes to the supporting sub text below Policy H2.7 in the Plan.

Aside from the Proposed Changes, these representations have also commented upon the associated evidence base, including the Sustainability Appraisal Report (Revised September 2018) and 'Annex A: Proposed Changes to figures in Section 4: Housing Delivery Strategy'.

We trust these representations will be carefully considered and we look forward to working with officers to support the proposed allocation through the examination.

**Please state which evidence document this representation relates to:**

**Please give details of why you support or do not support the updates to the associated evidence documents.**

**Supporting documents (Please see Objective)**

5147881

**Does your representation relate to a previous one**

<p><b>you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	450	<b>Consultee</b> Redrow Homes Ltd	<b>Agent</b> Senior Planner Lichfields	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 903369	<b>Person ID:</b> 443671	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective	
<b>Identify Proposed Change Reference Number</b>	PC68				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC68: Church Lane This proposed change includes additional supporting text to the proposed allocation at Church Lane. This is to respond to comments from Historic England in respect of the potential impact of the allocation on the setting of the Grade II listed Church of St John. The text acknowledges that there are views from the Church to the south-west (across the allocation) and that the allocation site forms part of fragmentary remains of a post-medieval water meadow system. Whilst acknowledging this key constraint, we consider that it does not provide any certainty about the capacity for accommodating development, and raises questions about whether the the housing could be sustainably accommodated at a less constrained location within the Trowbridge Community Area.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					



<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	451	<b>Consultee</b> Redrow Homes Ltd	<b>Agent</b> Senior Planner Lichfields	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 903369	<b>Person ID:</b> 443671	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective	
<b>Identify Proposed Change Reference Number</b>	PC72				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC72 & PC73: Southwick Court The proposed change includes further text in respect of the potential impact of the site on the water meadows (as a non-designated heritage asset) and on Southwick Court, a Grade II* listed medieval manor and farmhouse. The texts makes reference to a Heritage Impact Assessment which will be prepared by the Council and the need for further detailed assessment for planning applications. Reflecting our previous representations, we consider that this does not provide enough certainty about the capacity of the site to accommodate development, and this work must be progressed as part of the plan-making process. As it stands we do not consider there is adequate evidence to justify the principle and quantum of housing development proposed in this location. The proposed changes also include an acknowledgement that some parts of the site fall within Flood Zone 2 / 3 and need to be sequentially planned. Evidently such an assessment should be undertaken at the plan-making stage, and the Council should not be allocating sites in full knowledge that they may not meet the requirement of the sequential test, particularly when sites at a lower risk of flooding are available.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	452	<b>Consultee</b> Redrow Homes Ltd	<b>Agent</b> Senior Planner Lichfields	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 903369	<b>Person ID:</b> 443671	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective	
<b>Identify Proposed Change Reference Number</b>	PC73				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC72 & PC73: Southwick Court The proposed change includes further text in respect of the potential impact of the site on the water meadows (as a non-designated heritage asset) and on Southwick Court, a Grade II* listed medieval manor and farmhouse. The texts makes reference to a Heritage Impact Assessment which will be prepared by the Council and the need for further detailed assessment for planning applications. Reflecting our previous representations, we consider that this does not provide enough certainty about the capacity of the site to accommodate development, and this work must be progressed as part of the plan-making process. As it stands we do not consider there is adequate evidence to justify the principle and quantum of housing development proposed in this location. The proposed changes also include an acknowledgement that some parts of the site fall within Flood Zone 2 / 3 and need to be sequentially planned. Evidently such an assessment should be undertaken at the plan-making stage, and the Council should not be allocating sites in full knowledge that they may not meet the requirement of the sequential test, particularly when sites at a lower risk of flooding are available.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	453	<b>Consultee</b> Redrow Homes Ltd	<b>Agent</b> Senior Planner Lichfields	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 903369	<b>Person ID:</b> 443671	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective	
<b>Identify Proposed Change Reference Number</b>	PC70				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	PC70: Upper Studley This sites allocation has more than doubled from 20 to 45 dwellings. However, the sites location in Flood Zone 3 and 2 places significant constraint on its developable area, as well as the nearby heritage assets along Frome Road. It has also been noted that the trees to the south of the site may have importance for bat species relevant to the Bath and Bradford on Avon Bats SAC. The extent to which this will constrain the site and neutralise land for development is unknown.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	454	<b>Consultee</b> Redrow Homes Ltd	<b>Agent</b> Senior Planner Lichfields	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 903369	<b>Person ID:</b> 443671	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective	
<b>Identify Proposed Change Reference Number</b>	PC13				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>PC13 and PC21 The HSAP has sought to address Trowbridges housing shortfall by increasing the density of housing numbers within existing proposed allocations around the perimeter of the town. Across Trowbridges proposed allocations dwelling numbers are proposed to increase by 265. Trowbridges growth has been impeded for several years as a result of the possible impact of development on the Bath and Bradford-on-Avon Bats SAC. The effects of this has been to significantly delay progress of the Core Strategy allocation, Ashton Park, and other development opportunities in the town and its immediate vicinity. Furthermore, progress has been delayed as a result of the slow delivery of infrastructure to unlock the site. Table 4.10 of the Proposed Changes document (PC21) identifies an under delivery in Trowbridge of 19% against an overall requirement for 2006-26 of 6,810 dwellings. This represents 1,294 dwellings. Trowbridge is therefore the worst performing settlement in the whole of Wiltshire in terms of housing delivery, and this has had a significant impact on the delivery of the development strategy set out by the Council. Although the Factual Update to the Habitat Regulations Assessment Addendum states work on a Trowbridge Bat Mitigation Strategy is underway to allow development to proceed with recommended attenuation, the final publication date of this document or its findings are still unclear. Consequently, the implications for the delivery of Ashton Park and the proposed allocations are uncertain. Until the mitigation strategy is finalised and agreed by all stakeholders, the implications for development in Trowbridge remain uncertain and cannot be fully considered at examination. This will have commensurate impacts on delivery across the town. It is important that the Plan put forward for examination is positively prepared and sufficiently flexible to be able to respond to constraints and associated uncertainties in supply. However, the plan for Trowbridge as it stands is reliant on the uncertain outcomes of the Mitigation Strategy. Should progress with the document fail, under delivery through to the end of the Plan period is likely to result. We consider that this is tacitly acknowledged by the Council within the Factual Update to Habitat Regulations Assessment Addendum, where it is stated that: the bats response to development is likely to be delayed and difficult to ascertain with confidence, [and] this could suggest a need for phasing further development over and above the current draft and adopted allocation that might arise from the Local Plan Review. Otherwise there would be a risk that the capacity of the area to support the internationally important population of Bechsteins bats may be exceeded and as a result have significant adverse effects on the integrity of the SAC. Para. 3.3.10 The Council then conclude that this is not a matter for the HSAP to resolve and that it should instead be considered by the Local Plan Review. In view that the evidence underpinning the mitigation strategy and consequent delivery of these housing allocations has not been published for scrutiny, this lends further uncertainty to the deliverability of the proposed allocations at Trowbridge. In addition to not providing enough certainty to the deliverability of the proposed strategy, it is considered that the Proposed Changes continue to perpetuate an arbitrary</p>				



	<p>divide between Trowbridge town and the wider Community Area. The wider Trowbridge Community Area, particularly to the south and east of the town where fewer constraints are present, should provide sites to deliver the flexibility the Plan requires. At present the Plan has failed to consider all sustainable, available and deliverable sites to meet the short to medium term shortfall in delivery. We therefore object to the continued exclusion of the Trowbridge Community Area Remainder from consideration in the site selection process and the continued lack of flexibility in the strategy. Given the acknowledged environmental and infrastructure constraints around the town it is imperative that the LPA fully considers all options at this stage. The HSAP elects to allocate development near to Large Villages, including adjacent to North Bradley, and also where the indicative Remainder requirement is met. The continued decision to exclude wider consideration of all Large Villages around Trowbridge, including Southwick, is untenable in light of the significant housing shortfall. Beyond the SAC constraints identified, Trowbridges allocations are noted to have significant sensitivities to development as a result of landscape, heritage and flood risk, as well as requiring significant transport and social infrastructure to support development. The Proposed Changes Plan makes clear the numerous site-specific requirements, whilst increasing the allocation numbers within each site. The need to bring forward significant infrastructure investment, notably to improve education capacity within the town (PC53), as well as provide local sports facilities, green space and health facilities, places significant constraints on site capacity. In addition, the need to provide 10 to 16m landscaped corridors through sites to protect bat commuting corridors will further constrain deliverable housing numbers. These issues need to be clearly tested and addressed before the Council can be certain that they will deliver the required housing to meet the shortfall at Trowbridge.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	455	<b>Consultee</b> Redrow Homes Ltd	<b>Agent</b> Senior Planner Lichfields	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 903369	<b>Person ID:</b> 443671	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective	
<b>Identify Proposed Change Reference Number</b>	PC21				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>PC13 and PC21 The HSAP has sought to address Trowbridges housing shortfall by increasing the density of housing numbers within existing proposed allocations around the perimeter of the town. Across Trowbridges proposed allocations dwelling numbers are proposed to increase by 265. Trowbridges growth has been impeded for several years as a result of the possible impact of development on the Bath and Bradford-on-Avon Bats SAC. The effects of this has been to significantly delay progress of the Core Strategy allocation, Ashton Park, and other development opportunities in the town and its immediate vicinity. Furthermore, progress has been delayed as a result of the slow delivery of infrastructure to unlock the site. Table 4.10 of the Proposed Changes document (PC21) identifies an under delivery in Trowbridge of 19% against an overall requirement for 2006-26 of 6,810 dwellings. This represents 1,294 dwellings. Trowbridge is therefore the worst performing settlement in the whole of Wiltshire in terms of housing delivery, and this has had a significant impact on the delivery of the development strategy set out by the Council. Although the Factual Update to the Habitat Regulations Assessment Addendum states work on a Trowbridge Bat Mitigation Strategy is underway to allow development to proceed with recommended attenuation, the final publication date of this document or its findings are still unclear. Consequently, the implications for the delivery of Ashton Park and the proposed allocations are uncertain. Until the mitigation strategy is finalised and agreed by all stakeholders, the implications for development in Trowbridge remain uncertain and cannot be fully considered at examination. This will have commensurate impacts on delivery across the town. It is important that the Plan put forward for examination is positively prepared and sufficiently flexible to be able to respond to constraints and associated uncertainties in supply. However, the plan for Trowbridge as it stands is reliant on the uncertain outcomes of the Mitigation Strategy. Should progress with the document fail, under delivery through to the end of the Plan period is likely to result. We consider that this is tacitly acknowledged by the Council within the Factual Update to Habitat Regulations Assessment Addendum, where it is stated that: the bats response to development is likely to be delayed and difficult to ascertain with confidence, [and] this could suggest a need for phasing further development over and above the current draft and adopted allocation that might arise from the Local Plan Review. Otherwise there would be a risk that the capacity of the area to support the internationally important population of Bechsteins bats may be exceeded and as a result have significant adverse effects on the integrity of the SAC. Para. 3.3.10 The Council then conclude that this is not a matter for the HSAP to resolve and that it should instead be considered by the Local Plan Review. In view that the evidence underpinning the mitigation strategy and consequent delivery of these housing allocations has not been published for scrutiny, this lends further uncertainty to the deliverability of the proposed allocations at Trowbridge. In addition to not providing enough certainty to the deliverability of the proposed strategy, it is considered that the Proposed Changes continue to perpetuate an arbitrary</p>				

	<p>divide between Trowbridge town and the wider Community Area. The wider Trowbridge Community Area, particularly to the south and east of the town where fewer constraints are present, should provide sites to deliver the flexibility the Plan requires. At present the Plan has failed to consider all sustainable, available and deliverable sites to meet the short to medium term shortfall in delivery. We therefore object to the continued exclusion of the Trowbridge Community Area Remainder from consideration in the site selection process and the continued lack of flexibility in the strategy. Given the acknowledged environmental and infrastructure constraints around the town it is imperative that the LPA fully considers all options at this stage. The HSAP elects to allocate development near to Large Villages, including adjacent to North Bradley, and also where the indicative Remainder requirement is met. The continued decision to exclude wider consideration of all Large Villages around Trowbridge, including Southwick, is untenable in light of the significant housing shortfall. Beyond the SAC constraints identified, Trowbridges allocations are noted to have significant sensitivities to development as a result of landscape, heritage and flood risk, as well as requiring significant transport and social infrastructure to support development. The Proposed Changes Plan makes clear the numerous site-specific requirements, whilst increasing the allocation numbers within each site. The need to bring forward significant infrastructure investment, notably to improve education capacity within the town (PC53), as well as provide local sports facilities, green space and health facilities, places significant constraints on site capacity. In addition, the need to provide 10 to 16m landscaped corridors through sites to protect bat commuting corridors will further constrain deliverable housing numbers. These issues need to be clearly tested and addressed before the Council can be certain that they will deliver the required housing to meet the shortfall at Trowbridge.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		

<b>proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	456	<b>Consultee</b> Redrow Homes Ltd	<b>Agent</b> Senior Planner Lichfields	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 903369	<b>Person ID:</b> 443671	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Update to Habitats Regulations Assessment Addendum (September 2018) (EXAM/03)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	<p>Section 2.3 Bath and Bradford on Avon Bats SAC</p> <p>Section 2.3 of the Factual Update to the Habitat Regulations Assessment Addendum states work on a Bat Mitigation Strategy is underway to allow development to proceed with recommended attenuation. It is also stated that the strategy will be sufficiently advanced during the examination to allow the Council to demonstrate that the Plan is sound. A map is due to be prepared showing the zones where development would have a high or medium risk of adverse effects for the bats and where recreational pressure is likely to lead to in-combination effects.</p>				

**Assessment Addendum  
(September 2018).**

The final publication date of this document and its findings are still unclear. Until the Mitigation Strategy is finalised and agreed by all stakeholders, the implications for development in Trowbridge and the proposed allocations remain uncertain and cannot be fully considered at examination. The Mitigation Strategy should form a key piece of evidence to inform the development strategy at Trowbridge. To-date it has not been published in either final or draft form, and we consider this a considerable oversight which has prevented proper scrutiny of the proposed allocations and undermines any certainty regarding their deliverability.

Furthermore, the recommendations of the Strategy will have clear implications for the density of development across Trowbridge. Whilst allocation numbers have been increased at four sites, the Strategy looks set to recommend a variety of mitigation measures which centre on preserving landscape corridors, dark spaces and existing habitats within greenfield sites.

It is not possible for the Council to state that the plan will be found sound if the outcomes of the Strategy have not yet been either made public for scrutiny or available in draft form. This has commensurate impacts on delivery across the town. Without definitive mitigation measures identified, housing numbers cannot be established for certain.

It is important that the Plan put forward for examination is positively prepared and sufficiently flexible to be able to respond to constraints and associated uncertainties in supply. However, the plan for Trowbridge as it stands is reliant on the uncertain outcomes of the Mitigation Strategy. Should progress with the document fail, under delivery through to the end of the Plan period is likely to result.

Whilst much of the Trowbridge Community Area falls within the consultation zone for the SAC (as defined by Bat Special Areas of Conservation (SAC): Planning Guidance for Wiltshire (Issue 3.0, 10 September 2015) it should be acknowledged that there are areas which have a greater or lesser sensitivity or scope for impact. Sites within the wider community area that are less constrained should be given full consideration, particularly where they are not within any of the core sustenance zones for Annex II bats or within key species buffers.

**Section 3.3 Bath and Bradford on Avon Bats SAC – habitat loss / deterioration**

This section responds to Natural England's question as to whether the housing numbers in the Plan are deliverable. They have also noted that in the absence of bat surveys and defined mitigation standards, the capacity of the allocations is uncertain.

The Council's response is to suggest a 'precautionary' approach which will assume that habitats such as hedgerows, tree planting and streams are of key importance to bats within the consultation zones.

In considering the effects of this on the capacity of the proposed allocations, it is considered that there is evidently a great deal of supposition and uncertainty which is caused by the lack of any detailed information about the interface of the bats, their habitats and the development proposed. This is evident when looking at the Council's responses on the Upper Studley allocation, where the Council acknowledges the pressure such sites will place on important commuting and foraging habitats, and the potential to limit the scope for urban development. It is suggested that this will be mitigated through subsequent design. Reference is again made to the Mitigation Strategy, a key piece of evidence which is not available for scrutiny and clearly has not informed the preparation of the Plan.

This response is considered to be wholly inadequate given the significant delays to housing delivery at Trowbridge which have arisen out of this very issue. The Council must be able to share evidence to provide the certainty that the proposed allocations can be delivered. At the very least, the Council must propose a delivery strategy which provides enough flexibility to ensure that unexpected constraints on allocations will not lead

	to further shortfalls within the plan-period. An obvious solution to this would be to ensure that the distribution strategy includes the wider Trowbridge Community Area to maximise the scope to incorporate sustainable, deliverable sites.		
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes



<b>Comment ID:</b>	457	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187830	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. It is a crazy number of houses that are planned for Bratton. Yes there is a need for more housing but certainly not what is proposed here for a number of reasons. What is happening in Westbury must be taken into account since Bratton is part of the infrastructure supporting and supported by Westbury. A huge number of houses are being built in Westbury and as a consequence, roads, schools and medical services are under enormous pressure. The area simply cannot cope with even more residents. As one small example Westbury Rail Station is already having to expand its car park. Where will further cars park? The road through Bratton, is dangerous because of the volume of traffic on it, not to mention cyclists and horses. At the Westbury end the road is far too narrow, particularly from the cemetery until the mini roundabout by the Turkish barber in Westbury and, from Bratton towards Edington there is not even room for a pavement making walking through particularly dangerous. It gets increasingly dangerous through Edington and further, towards Market Lavington. The volume of traffic and the winding, undulating nature of the road make it particularly dangerous (and, of course, the many potholes!). How will it cope with the inevitable extra traffic? Court Lane is very dangerous with a particularly dangerous junction onto Westbury road and there is an increasing number of delivery trucks and lorries using it. How will people get to Trowbridge when all routes to Wiltshires major town are log jammed? The queues along the A350 are horrendous at rush hour even now and have not been helped by the vast housing estates that are continuing to expand on the outskirts of Westbury Bratton Post Office and shop is a valuable village resource particularly when the next nearest Post Office in Westbury is beyond the Westbury Station. It is already so cramped that it can be very uncomfortable in there. Additionally, there is nowhere to park except on the side of the road (thus exacerbating the dangers on the B3098 already mentioned). Bratton is lucky enough to have a doctors surgery and pharmacy in the village. It is one of the things that makes the village attractive and it is a wonderful service but very difficult even now to get a doctors appointment I was recently told six weeks. There is no way that it will be able to cope with the influx of residents 57 new houses would bring - I believe there is an additional proposed housing project in The Butts as well. I also believe that the Westbury White Horse Surgery is struggling to cope with the number of patients it has and if the little Bratton surgery becomes inundated, what will happen to those in dire need of medical attention? - our nearest hospital is the community hospital in Trowbridge The Bratton primary school is another issue as there will inevitably be an increase in the numbers of students, even on a conservative estimate with the possible addition two classes of students. a) Where will they be accommodated, b) Who will teach them and c) How will the school provide sporting facilities in a limited space? The disruption that will be caused as a result of the building works will be horrendous. The road will have to be dug up to lay sewage, water pipes, gas and electricity and phone lines. Given how much disruption we have already had to our phone services as BT tries to improve our service, what will happen when the service boxes have to take an even greater load? As to the actual housing that will be built far too many of the new houses label themselves executive. They are clearly not aimed at those in need of housing but at building apparently prestigious houses for those with the where-withal to pay for them. Couples who grew up in the area should be able to live in the area and not be forced out by the greed of builders. A couple of token cheaper houses for first time buyers is not enough and while I am not advocating the building of tiny modern boxes with no garden, as seems to be the case where affordable housing is often built, jamming as many houses as possible into the smallest footprint, it should be a consideration. We are pleased that we live

	<p>close to a main line to London and use it frequently it is, it seems, also our downfall because so many people want to live in this area for that reason. However, that does not justify endless estates to allow the commuters easy access. It seems to me that Wiltshire County Council would do well to look at using some of the brown sites around other areas that are more able to cope with the additional housing in terms of infrastructure and planners need to plan intelligently and with compassion, bearing in mind the impact on the quality of life of both current and future residents.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
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<b>Comment ID:</b>	458	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126137	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC72				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Referenced objections to site 3565 Introduction All information presented below is believed to be factual. All references made are listed in the body of the text and where possible are included in a bibliography complete with hyperlinks. Sources referenced are from Wiltshire County Policy, WCC Commissioned consultants reports, Natural England, The Environment Agency, Wiltshire County Officers Reports, DEFRA, Wiltshire County Planning Archaeologist and currently applicable NPPF direction. Argument Site 3565 is unsuitable for development and unsustainable Description Site 3565 (Fields adjacent to Southwick Court) lies mostly in the Parish of Southwick, and partly in the Parish of North Bradley, just outside of the County Town of Trowbridge (Grid Ref ST 84776 55992). On the Northern side of the site lies a stream and brook network which is defined by a hedgerow dating to at least 1795. The hedgerow is protected by the 1997 Hedgerows act under several set criteria as an Important hedgerow. A majority of this hedgerow is also protected by tree protection orders and contains a brook which intersects with the Lambrok Stream. The Northern side of this hedgerow lies within the town of Trowbridge, the Southern within the Parish of Southwick. As the Sustainability Appraisal states: The land serves to separate Trowbridge from the village of Southwick. As such, development would potentially threaten the separate identity of Southwick and intrinsic quality of the countryside. Which runs contrary to Core Policy 29 and should immediately render the site invalid. To the immediate North of this protected hedgerow lies a variety of developments, the majority dating back to the 1970s with some as recently constructed as the late 1990s. These consist of a variety of building styles but are well screened from both the rolling landscape and the protected Heritage assets beyond. Without exception they are constructed within the boundary of the town of Trowbridge. The current built form has been protected within the Housing Site allocation document in which it pledges to respect the current form. This takes the shape of a number of cul-de-sacs which define the town boundary with the proposed site. The proposed site is bisected on a North-South line by the protected Lambrok Stream. This divides the site into two portions, the westernmost third which is directly adjacent to the A361 and the easternmost two thirds. The stream feeds directly into the stream and brook running along the hedgerow and is bounded by significant level two and three flood plains. This is exacerbated by a drop-off of approximately three metres from the Southern extreme of the proposed site to the Northern boundary demarcated by the Hedgerow and stream. The Lambrok stream floods on a regular basis which then impacts on the brook and stream feature running along the Parish boundary. The system takes surface water runoff from several hundred yards away from the properties to the North of Silver Street Lane some hundred and fifty metres upslope to the North. This flooding directly impacts on the entire North-South axis of the site and affects the entirety of the drop-off. A consequence of this flooding is to force both surface water and untreated sewage out of the drains in the nearby housing developments. The immediate South of the site is bounded by the Lambrok Stream</p>			

and is also classified as being predominantly level two and three flood plain. The majority of the land between these areas of notified flood plain is classified as suffering from build-up of excessive surface water. To the South West of the site lie the two registered Heritage Assets of Southwick Court and its separately listed moat. These are informed and contextualised by the site itself which contains earthworks associated with the Assets from the post-medieval period. The moat feature is fed and supported by the managed and developed geology and fieldworks which are a part of the Lambrok stream. Independent consultants have recognised the interdependency of these features and the reliance of the one on the other. A field to the South-East of the proposed site has been noted to have damaged the context of the Listed Assets with the construction of a solar farm. 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Use of the site for dwellings will therefore increase flooding suffered by current dwelling invalidating the Environment Agency requirement for lifetime certainty of freedom from flooding and fail NPPF sequential testing. The use of the site will irreparably damage Heritage assets, described by consultants as: Nationally important (Wiltshire Housing Sites Allocations Plan: Historic impact assessment 7.15) Finally, access to the site will either involve cutting through a level three flood plain and protected hedgerow. Or Cutting through Important Hedgerow protected by the 1997 Hedgrows Act and invalidating the terms of the proposed plan as voted into being by Cabinet and Councillors. Or Cutting a road from Southwick village across landscape integral to listed Heritage Assets. Or Enacting a Compulsory Purchase Order to develop Axe and Cleaver Lane to make it fit for vehicular traffic. Legislative, Factual and Policy issues Legislative The 1997 Hedgerow act specifically forbids the permanent destruction or removal of an Important hedgerow. A link provided by DEFRA is here: <https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management> The hedgerow running to the immediate North of the site, forming the boundary between Trowbridge and Southwick is show on the 1793 Andrews and Durys map of Wiltshire and can be found in the Wiltshire & Swindon History Centre, Chippenham. A link to this map appears in the bibliography and a detail is reproduced below: [See attachment for map] This unequivocally dates the boundary and is sufficient, along with other set criteria such as the presence of a watercourse, footpath and broad leafed species, to meet the criteria. Despite permission granted in advance of any application by the County arboricultural Officer to cut through this hedgerow: There has been a site meeting with various interested parties who have expressed a clear desire not to remove any trees or any parts of the existing hedge other than one small section to make way for an emergency access route with lockable bollards on both sides of the proposed route. They will include this within a tree survey and recommendations and should the development gain consent, they would be permitted to remove the small, 7m section of hedge. This hedgerow is protected under legislation. No order needs to me made to confer this status in law, just the meeting of the criteria. It marks a pre-1850 parish or township boundary (criterion a) It incorporates an archaeological feature (post medieval earthworks) as noted in the Proposal and confirmed by the Planning Archaeologist (email in appendix C) (criterion 2/3). The hedgerow is associated with a pre-1600 estate or manor (criterion 4) Contains certain categories of species of bird, animals or plants listed in the Wildlife and Countryside Act or Joint Nature Conservation Committee (JNCC) publications. Runs alongside a bridleway, footpath, road used as a public path, or a byway open to all traffic and includes at least 4 woody species, on average, in a 30m length and has at least 2 of the associated features listed at (i) or (v) below. The associated features are: i. A bank or wall supporting the hedgerow. ii. Less than 10% gaps. iii. On average, at least one tree per 50m. iv. At least 3 species from a list of 57 woodland plants. v. v.A ditch. vi. A number of connections with other hedgerows, ponds or woodland. vii. A parallel hedge within 15m. The act states that the hedgerow cannot be removed and can only be temporarily broken through if the work is for defence of the realm or for public safety reasons and only if there is no other access. If a breakthrough has to occur it must be no wider than 20

metres and replaced as soon as the work is complete. Furthermore it is clearly stated that: The presumption is in favour of protecting and retaining important hedgerows (The hedgerow regulations 1997 1.7) the removal(1) of a hedgerow to which these Regulations apply is prohibited (The hedgerow regulations 1997 5.0) This removes access from the town of Trowbridge. Paragraph 170 of the current NPPF regulations states that: A functional floodplain is a very important planning tool in making space for flood waters when flooding occurs. Generally, development should be directed away from these areas using the Environment Agency's catchment flood management plans, shoreline management plans and local flood risk management strategies produced by lead local flood authorities. The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. Areas which would naturally flood, but which are prevented from doing so by existing defences and infrastructure or solid buildings, will not normally be identified as functional floodplain. If an area is intended to flood, eg an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often. Paragraph: 015 Reference ID: 7-015-20140306 This photograph illustrates the nature of the functional flood plain as shown in the Environment Agency South Court Farm map. The photograph was taken on the upper portion of the flood plain itself. [See attachment for photograph] The building in the background being Southwick Court Farm and the wooden structure in the middle ground the corral indicated on the same photograph. This is at the high point of a drop off of approximately two metres to the hedge junction at the bottom left of the photo (Northern fringe of the site). This photograph was taken from approximately this point on the satellite image: [See attachment for map] This is the Environment Agency Flood plain assessment (two footpaths appearing on OS maps are absent from this map but run from the current built form, these are not currently disputed or subject to DMMO Process): [See attachment for map] Current flood events have had this impact in nearby properties: Policy Wiltshire Policy CR1, contained within the January 2009 Leisure and Recreation Development Plan Document states that: The public rights of way network will be protected from development for other land uses and extensions and improvements will be sought, where appropriate, as part of development proposals. This recognition goes further and an Officer report relating to the Solar Farm constructed in another section of the Southwick Court estate reads: The Planning (Listed Buildings and Conservation Areas) Act 1990 to give special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (S16 and 66). Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation. Significance can be harmed or lost through development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Core Policy 58 of the Wiltshire Core Strategy echoes the above national policy in seeking the protection, conservation and, where possible, enhancement of listed buildings. As will be illustrated this policy is not upheld when the HIA report is considered. The proposed site contains three notified footpaths as set out in OS maps and a further two long standing trackways are the subject of DMMO applications at this time. When Natural England comments made to Wiltshire Council in their response to the Housing Allocation Proposal are taken into consideration: We note that a high proportion of the proposed sites are land which is either bisected or bounded by public rights of way or is used for recreational purposes as open space. Development of these sites is likely to detrimentally affect the recreational value of these features. (C.f. NPPF paras 74. Existing open space should not be built on unless and 75. Planning policies should protect and enhance public rights of way and access.). We note that the Wiltshire Core Strategy says (CP51 green infrastructure) If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required. Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process. We are unaware of any such audits being undertaken since the Core Strategy was adopted, and our impression is that, compensatory provision has rarely, if ever, been made. This demonstrates the determination of an independent body in the assessment of the aspect of the site which is relevant here. The Sustainability Assessment defines the site as being used for informal recreation. A survey delivered average daily usage as being between 100

and 120 individuals. Furthermore Natural England responded to Wiltshire Council by stating that: It is not clear how public rights of way and valued open space has been considered in the Sustainability Appraisal. While they feature under objective 7, (will the policy protect rights of way, open space and common land?), a word search shows that right/rights of way is only mentioned 3 times in the site assessments, while existing open space is mentioned only twice. In its own assessment of the site Wiltshire Council describe the site in the following words: This is recreational or amenity space at the edge of a settlement that relates more closely to the built environment. Core Policy 29 and the supporting text (paragraph 5.150) of the WCS identify specific issues to be addressed in planning for the Trowbridge Community Area, including: It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. All development in Trowbridge should be sensitive to constraints, such as the local County Wildlife Sites, SSSIs, Ancient Woodland, the Western Wiltshire Greenbelt and areas at risk of flooding This site is within Southwick, but abutting Trowbridge thereby removing that separation entirely and both contains, and is bounded by, areas not only at risk of flooding, but which currently flood on a regular basis. Independent adjudication WCC commissioned reports The Sustainability assessment commissioned by Wiltshire Council (Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Annex 1, A.9 Trowbridge Principal Settlement) is confusing and as a document presented to both Cabinet and Council for two discrete votes talks of housing density of both 280 and 237 dwellings. The Housing Allocation Proposal suggests 180 as the density for this site. Despite this the site is continually referred to as being on the North of the town. The inference being that the site is within the boundary of the Town and not the village. Paragraph 157 of the current NPPF states that: Crucially, Local Plans should: Identify land where development would be inappropriate, for instance because of its environmental or historic significance The County Planning Archaeologist has reported in June 2017 that: I have previously provided screening opinion advice for this site to the planning team. I highlighted that The Wiltshire and Swindon Historic Environment Record shows that a number of features have been plotted within the proposed development site which relate to a post-medieval water meadow system. Southwick Court Farm lies immediately south of the proposed development site and contains a number of important heritage assets including a medieval moated site with a medieval farmstead of which the farmhouse is a Grade II\* Listed Building (national ref. 1194818) dating from 1567 to 1599. I therefore raised the need to have a full assessment of the impacts on the heritage assets in particular on the water meadows and Grade II\* Listed Building. Without further assessment I cannot advise on the appropriateness of the development but I would say that putting 180 houses will have an impact on a number of heritage assets. The Sustainability Assessment advises strongly that an independent Heritage Impact Assessment be made of the site. At the time of presentation of the Sustainability Assessment such a report had been made and presented. The section pertaining to this site runs for seven pages including a map and I have taken the liberty of adding a link in the bibliography to this document in which seven pages relate to this site. In an attempt to present the significance of this document to the argument I reproduce a number of direct quotations here: 7.16 Setting makes a critical contribution to the significance of both assets, relating in the first instance to their immediate setting within the earlier intact and functional moated enclosure. The relationship to the later farm buildings outside the moat adds to the historical value in supplying the most recent agricultural chapter in the narrative of a site continuously occupied for around 600 years. The relationship to the wider landscape also contributes to the significance of the assets. 7.17 Similarly, the relationship of the asset group to the wider agricultural hinterland is important, as currently it stands in splendid isolation as the one prominent feature delineated in part by the trees following the moat boundary in a sizeable tract of open agricultural landscape. The asset and its wider setting should therefore be considered to be an archaeological landscape of considerable importance. For example, the open space around the asset allows a clear understanding of the hierarchy of the 16th/17th century farmsteads in the immediate vicinity. 7.18 A Functional and historical connection with this agricultural landscape can therefore be established which elevates its importance in terms of contribution to these values and the assets setting. 7.20 The designated assets are of high importance, reflecting their national significance. The moat itself should be viewed as being indivisible from the significance of the designated features and, in its own right, likely to be of equivalent significance to a Scheduled Monument<sup>18</sup>. 7.23 Change in the wider landscape of the proposed site is

likely to have two main effects. Firstly, it has the potential to sever the functional and historical links between the moated site and particularly the farmhouse with the contemporary water meadows that were likely integral to the 16th century enhancement of the place, and with the later enclosure landscape that forms its agricultural hinterland. Secondly, development has the potential to change the ability to appreciate the assets relatively prominent position in the local landscape. It stands on a small area of slightly elevated ground, in splendid isolation from the surrounding historic villages reflecting its origins as an isolated farm centre. Risk of harm 7.24 Development of the entire proposed allocation would completely sever the assets from their landscape and economic/historical context. This would result in harm to the significance of the asset. Similarly, development would be likely to reduce the legibility of the asset as an isolated manorial farm, and change its prominence in the local landscape. The historical landholdings of the assets have already been harmed by development, particularly the large-scale intrusion created by the nearby solar farm. 7.25 While the core of the assets relationships and setting i.e. between the individual built elements and the archaeological heritage would remain intact, the potential extent of losses of demonstrably functionally, historically and visually connected landscape comprising the wider setting of the asset represents a major impact. This would likely approach substantial harm, given the cumulative effect of interacting layers of assets significance in forming a large-scale and relatively intact historic landscape. 7.26 Taking a precautionary approach, this is considered to be a high effect for the purposes of this assessment. 7.27 The same assertions hold for the non-designated elements of the place. Options for sustainable development 7.28 Development anywhere within the proposed allocation area will result in loss of functional and historical relationships between the asset and the area of water meadow or enclosures affected. Mitigation by design is not considered to be a realistic option if delivery of significant numbers of houses on site is required. While a small number of units could be accommodated in the extreme eastern extent of the site, this would need to be very carefully designed to sit down into the landscape but the comparatively flat site and open landscape does not lend itself to this type of intervention. Cumulative effects 7.34 When considered in combination with other proposed allocations (H2.2 and H2.4) H2.6 could result in significant urbanisation of the southern edge of Trowbridge. This would substantially reduce the current separation between the historic settlements of Southwick and North Bradley from suburban Trowbridge, in addition to eroding the significant and legible historic character of the landscape. The final summative comment is: Options for sustainable development 7.36 As indicated above, archaeological investigation to understand the extent, date and significance of in situ remains would be required; the results should inform an appropriate mitigation strategy in support of any planning application. This would be secured by condition. 7.37 Mitigation by design is not considered to be a realistic option if delivery of significant numbers of houses on site is required. Insertion of a small area of development in the eastern extremity of the site could potentially avoid the majority of effects, but may not be either viable or feasible on other grounds. (My highlights throughout) [See attachment for highlights] The conclusion is accompanied by this map, red being land to remain untouched: [See attachment for map] And the interpretation of this conclusion as presented to Cabinet and Council to inform their vote was presented as: In fact, the assessment concludes that less than substantial harm would likely result, albeit at a perceived higher end of the less than substantial harm scale. To paraphrase this interpretation: In actual fact the wording used to interpret a clear directive is speculative, misleading and does not appear in any conclusion in the independent report and the site has been adjudged to be at high risk and totally unsuited to any significant development. In the HRA assessment of the site commissioned by Wiltshire Council a determination of the site determined that due to its ecologically and environmentally sensitive nature the Lambrok stream and associated drainage features must be: Protected and/or buffered. This is in partial recognition of its significance as a natural corridor for wildlife, relied upon by some endangered species such as water voles and Bechstein bats and partially as recognition of the ongoing practical function as a flood plain. National body comment In response to the HRA document Natural England responded to Wiltshire Council with this determination: A range of onsite mitigation measures are proposed. However, it is not clear that these measures can be delivered while delivering the development requirements of the site. For example, can hedgerows be retained or will they need to be bisected by access roads etc.? If they cannot be delivered, it is not clear whether this invalidates the conclusions of the HRA. The onsite mitigation policy says Sensitive habitat features include: ... These features should be retained. The policy thus only protects the listed sensitive features, but not any unlisted



sensitive features. The HRA does not discuss whether this list of features covers the vast majority of features or otherwise quantified the proportion of features covered. It would give greater certainty to the HRA if it did. We note that the onsite mitigation policy requires 10-16m of native landscaping. It is not clear why these figures were chosen, and why there is such a spread in width. We suggest this is reviewed and justified, to provide greater certainty in the conclusions of the HRA. In the same response they also determine: In terms of site allocation policies, we have concerns around whether the allocations are consistent with the NPPF in the context of impacts on rights of way and open space, given what we perceive as a lack of implementation of relevant NPPF and Core Strategy policies (NPPF paras 74 and 75 and CP51) on comparable sites. As such, without confirmation that a robust approach will be taken to implementing these policies, we advise that the plan is unsound. (My bold and italic) The Environment agency has, in relation to this point, determined that a 20 metre environmental buffer be incorporated. This independent determination and specialist advice removes the access to the site from either the North or East. Access from the North, being through the residential property which the Council have pledged to respect in the plan as voted upon by Cabinet and Councillors, and through an important hedgerow protected in law and through a required environmental buffer (whatever the depth) is therefore neither practical or legal. This would also require acquiescence from The Town and Parish Councils who publicly oppose the site along with a separate license from the Environment Agency due to the notified flood plain and the associated drainage system. Access from the East, the A361, would also require cutting through hedgerow protected by the HRA assessment, Natural England requirements and disregarding the Heritage Impact Assessment. In addition a bridge/culvert would need to be constructed to protect not only the Heritage Asset as listed, but to ensure the lifetime surety from flooding as required by the NPPF sequential test. The site is presented as being of marginal sustainability and fails many of the tests set up for sustainability criteria, most notably access to infrastructure and transport links (a sporadic and limited bus service and distances of over 2km to both the centre of town and any rail service). Serious concerns have been raised in the HIA report and breaches of both law and regulation would have to be made. Conclusion Since the site was first put forward for consultation in the June 2017 Draft Housing Allocation Proposal many arguments based in fact have emerged mitigating against its sustainability. These take the form of legal proscriptions such as the 1997 Hedgerows Act and the Planning (Listed Buildings and Conservation Areas) Act 1990, direction from National bodies such as Natural England and the Environment Agency, procedural direction from the NPPF and from reports commissioned by Wiltshire Council at great cost to the public purse. This emerging evidence argues strongly that, had it been in the hands of Council Officers during the writing of the Draft, the site would have been deemed unsustainable and unsuited to development. The process in which we are all engaged is designed to seek the truth and to give weight to all evidence, irrespective of its source, but judged only on its validity. This presentation is referenced, logical and factual. It refers to a single site in a County wide process and must have occupied a proportionately small amount of assessment at its inclusion but which means immeasurably more to those who use and value it beyond its monetary value. It can only be hoped that, with the presentation of this interwoven evidence a true picture of the site as current recreational space, wildlife haven, functional flood plain and nationally important landscape it can be safeguarded. The descriptors in the above paragraph are those of agencies and Officers from whose hard work the argument above is developed and presented. Thank you for taking the time to consider and assess the above points. If at any point you feel that a visit to the site would be advantageous I would be happy to act as your guide. Bibliography Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A.9 Trowbridge Principal Settlement Wiltshire Council May 2018 Wiltshire Housing Site Allocations Plan Heritage impact assessment Final Report Prepared by LUC March 2018 <http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Submission%20July%202018/The%20Plan%20%26%20Supporting%20Documents&fileref=6> The 1997 Hedgerow act <https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management> 1793 Andrews and Durys map of Wiltshire Wiltshire & Swindon History Centre, Chippenham [http://www.wiltshirerecordsociety.org.uk/map/wrs\\_v08\\_index\\_map.jpg](http://www.wiltshirerecordsociety.org.uk/map/wrs_v08_index_map.jpg) CASE OFFICER'S REPORT 15/04570/FUL <https://unidoc.wiltshire.gov.uk/UniDoc/Document/Search/DSA,851321> <https://unidoc.wiltshire.gov.uk/UniDoc/Document/File/MTUvMDQ1NzAvRlVMLDY0NDcwNQ==> Wiltshire Housing Site Allocations Plan Pre-

	submission draft plan Habitat Regulations assessment (HRA) June 2017 WHSA%2520PSCONS10%2520Habitat%2520Regulations%2520Assessment%2520June%25202017[3917][3859].pdf Letters and emails from and to The Environment Agency, Natural England and the County Planning Archaeologist can be presented in full if required.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5152504		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	459	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126137	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC73				
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Whilst this is not visible from the Assets, it has impacted on the managed landscape and associated ancillary buildings related to the Assets. The proposed development is directly adjacent to the Assets themselves. To the immediate South-East lie Bramble Farm. This land is currently used for cattle farming as is the site itself which is worked on a tenancy basis. Access to Bramble Farm is by a part shingled and part earthen trackway known as Axe and Cleaver Lane. The proposed site itself is currently used for a mix of the aforementioned cattle farming, informal recreation and leisure, and houses a number of public footpaths. The footpaths lead to the nearby villages of Southwick and North Bradley and on to the villages of Wingfield and Hoggington. Current OS maps include three footpaths, but DMMO procedures are currently in place for two others with documentary evidence showing their unrestricted use for thirty years. 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Legislative, Factual and Policy issues Legislative The 1997 Hedgerow act specifically forbids the permanent destruction or removal of an Important hedgerow. A link provided by DEFRA is here: <https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management> The hedgerow running to the immediate North of the site, forming the boundary between Trowbridge and Southwick is show on the 1793 Andrews and Durys map of Wiltshire and can be found in the Wiltshire & Swindon History Centre, Chippenham. A link to this map appears in the bibliography and a detail is reproduced below: [See attachment for map] This unequivocally dates the boundary and is sufficient, along with other set criteria such as the presence of a watercourse, footpath and broad leaved species, to meet the criteria. Despite permission granted in advance of any application by the County arboricultural Officer to cut through this hedgerow: There has been a site meeting with various interested parties who have expressed a clear desire not to remove any trees or any parts of the existing hedge other than one small section to make way for an emergency access route with lockable bollards on both sides of the proposed route. They will include this within a tree survey and recommendations and should the development gain consent, they would be permitted to remove the small, 7m section of hedge. This hedgerow is protected under legislation. No order needs to me made to confer this status in law, just the meeting of the criteria. It marks a pre-1850 parish or township boundary (criterion a) It incorporates an archaeological feature (post medieval earthworks) as noted in the Proposal and confirmed by the Planning Archaeologist (email in appendix C) (criterion 2/3). The hedgerow is associated with a pre-1600 estate or manor (criterion 4) Contains certain categories of species of bird, animals or plants listed in the Wildlife and Countryside Act or Joint Nature Conservation Committee (JNCC) publications. Runs alongside a bridleway, footpath, road used as a public path, or a byway open to all traffic and includes at least 4 woody species, on average, in a 30m length and has at least 2 of the associated features listed at (i) or (v) below. The associated features are: i. A bank or wall supporting the hedgerow. ii. Less than 10% gaps. iii. On average, at least one tree per 50m. iv. At least 3 species from a list of 57 woodland plants. v. v.A ditch. vi. A number of connections with other hedgerows, ponds or woodland. vii. A parallel hedge within 15m. The act states that the hedgerow cannot be removed and can only be temporarily broken through if the work is for defence of the realm or for public safety reasons and only if there is no other access. If a breakthrough has to occur it must be no wider than 20

metres and replaced as soon as the work is complete. Furthermore it is clearly stated that: The presumption is in favour of protecting and retaining important hedgerows (The hedgerow regulations 1997 1.7) the removal(1) of a hedgerow to which these Regulations apply is prohibited (The hedgerow regulations 1997 5.0) This removes access from the town of Trowbridge. Paragraph 170 of the current NPPF regulations states that: A functional floodplain is a very important planning tool in making space for flood waters when flooding occurs. Generally, development should be directed away from these areas using the Environment Agency's catchment flood management plans, shoreline management plans and local flood risk management strategies produced by lead local flood authorities. The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. Areas which would naturally flood, but which are prevented from doing so by existing defences and infrastructure or solid buildings, will not normally be identified as functional floodplain. If an area is intended to flood, eg an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often. Paragraph: 015 Reference ID: 7-015-20140306 This photograph illustrates the nature of the functional flood plain as shown in the Environment Agency South Court Farm map. The photograph was taken on the upper portion of the flood plain itself. [See attachment for photograph] The building in the background being Southwick Court Farm and the wooden structure in the middle ground the corral indicated on the same photograph. This is at the high point of a drop off of approximately two metres to the hedge junction at the bottom left of the photo (Northern fringe of the site). This photograph was taken from approximately this point on the satellite image: [See attachment for map] This is the Environment Agency Flood plain assessment (two footpaths appearing on OS maps are absent from this map but run from the current built form, these are not currently disputed or subject to DMMO Process): [See attachment for map] Current flood events have had this impact in nearby properties: Policy Wiltshire Policy CR1, contained within the January 2009 Leisure and Recreation Development Plan Document states that: The public rights of way network will be protected from development for other land uses and extensions and improvements will be sought, where appropriate, as part of development proposals. This recognition goes further and an Officer report relating to the Solar Farm constructed in another section of the Southwick Court estate reads: The Planning (Listed Buildings and Conservation Areas) Act 1990 to give special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (S16 and 66). Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation. Significance can be harmed or lost through development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Core Policy 58 of the Wiltshire Core Strategy echoes the above national policy in seeking the protection, conservation and, where possible, enhancement of listed buildings. As will be illustrated this policy is not upheld when the HIA report is considered. The proposed site contains three notified footpaths as set out in OS maps and a further two long standing trackways are the subject of DMMO applications at this time. When Natural England comments made to Wiltshire Council in their response to the Housing Allocation Proposal are taken into consideration: We note that a high proportion of the proposed sites are land which is either bisected or bounded by public rights of way or is used for recreational purposes as open space. Development of these sites is likely to detrimentally affect the recreational value of these features. (C.f. NPPF paras 74. Existing open space should not be built on unless and 75. Planning policies should protect and enhance public rights of way and access.). We note that the Wiltshire Core Strategy says (CP51 green infrastructure) If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required. Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process. We are unaware of any such audits being undertaken since the Core Strategy was adopted, and our impression is that, compensatory provision has rarely, if ever, been made. This demonstrates the determination of an independent body in the assessment of the aspect of the site which is relevant here. The Sustainability Assessment defines the site as being used for informal recreation. A survey delivered average daily usage as being between 100

and 120 individuals. Furthermore Natural England responded to Wiltshire Council by stating that: It is not clear how public rights of way and valued open space has been considered in the Sustainability Appraisal. While they feature under objective 7, (will the policy protect rights of way, open space and common land?), a word search shows that right/rights of way is only mentioned 3 times in the site assessments, while existing open space is mentioned only twice. In its own assessment of the site Wiltshire Council describe the site in the following words: This is recreational or amenity space at the edge of a settlement that relates more closely to the built environment. Core Policy 29 and the supporting text (paragraph 5.150) of the WCS identify specific issues to be addressed in planning for the Trowbridge Community Area, including: It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. All development in Trowbridge should be sensitive to constraints, such as the local County Wildlife Sites, SSSIs, Ancient Woodland, the Western Wiltshire Greenbelt and areas at risk of flooding This site is within Southwick, but abutting Trowbridge thereby removing that separation entirely and both contains, and is bounded by, areas not only at risk of flooding, but which currently flood on a regular basis. Independent adjudication WCC commissioned reports The Sustainability assessment commissioned by Wiltshire Council (Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Annex 1, A.9 Trowbridge Principal Settlement) is confusing and as a document presented to both Cabinet and Council for two discrete votes talks of housing density of both 280 and 237 dwellings. The Housing Allocation Proposal suggests 180 as the density for this site. Despite this the site is continually referred to as being on the North of the town. The inference being that the site is within the boundary of the Town and not the village. Paragraph 157 of the current NPPF states that: Crucially, Local Plans should: Identify land where development would be inappropriate, for instance because of its environmental or historic significance The County Planning Archaeologist has reported in June 2017 that: I have previously provided screening opinion advice for this site to the planning team. I highlighted that The Wiltshire and Swindon Historic Environment Record shows that a number of features have been plotted within the proposed development site which relate to a post-medieval water meadow system. Southwick Court Farm lies immediately south of the proposed development site and contains a number of important heritage assets including a medieval moated site with a medieval farmstead of which the farmhouse is a Grade II\* Listed Building (national ref. 1194818) dating from 1567 to 1599. I therefore raised the need to have a full assessment of the impacts on the heritage assets in particular on the water meadows and Grade II\* Listed Building. Without further assessment I cannot advise on the appropriateness of the development but I would say that putting 180 houses will have an impact on a number of heritage assets. The Sustainability Assessment advises strongly that an independent Heritage Impact Assessment be made of the site. At the time of presentation of the Sustainability Assessment such a report had been made and presented. The section pertaining to this site runs for seven pages including a map and I have taken the liberty of adding a link in the bibliography to this document in which seven pages relate to this site. In an attempt to present the significance of this document to the argument I reproduce a number of direct quotations here: 7.16 Setting makes a critical contribution to the significance of both assets, relating in the first instance to their immediate setting within the earlier intact and functional moated enclosure. The relationship to the later farm buildings outside the moat adds to the historical value in supplying the most recent agricultural chapter in the narrative of a site continuously occupied for around 600 years. The relationship to the wider landscape also contributes to the significance of the assets. 7.17 Similarly, the relationship of the asset group to the wider agricultural hinterland is important, as currently it stands in splendid isolation as the one prominent feature delineated in part by the trees following the moat boundary in a sizeable tract of open agricultural landscape. The asset and its wider setting should therefore be considered to be an archaeological landscape of considerable importance. For example, the open space around the asset allows a clear understanding of the hierarchy of the 16th/17th century farmsteads in the immediate vicinity. 7.18 A Functional and historical connection with this agricultural landscape can therefore be established which elevates its importance in terms of contribution to these values and the assets setting. 7.20 The designated assets are of high importance, reflecting their national significance. The moat itself should be viewed as being indivisible from the significance of the designated features and, in its own right, likely to be of equivalent significance to a Scheduled Monument<sup>18</sup>. 7.23 Change in the wider landscape of the proposed site is

likely to have two main effects. Firstly, it has the potential to sever the functional and historical links between the moated site and particularly the farmhouse with the contemporary water meadows that were likely integral to the 16th century enhancement of the place, and with the later enclosure landscape that forms its agricultural hinterland. Secondly, development has the potential to change the ability to appreciate the assets relatively prominent position in the local landscape. It stands on a small area of slightly elevated ground, in splendid isolation from the surrounding historic villages reflecting its origins as an isolated farm centre. Risk of harm 7.24 Development of the entire proposed allocation would completely sever the assets from their landscape and economic/historical context. This would result in harm to the significance of the asset. Similarly, development would be likely to reduce the legibility of the asset as an isolated manorial farm, and change its prominence in the local landscape. The historical landholdings of the assets have already been harmed by development, particularly the large-scale intrusion created by the nearby solar farm. 7.25 While the core of the assets relationships and setting i.e. between the individual built elements and the archaeological heritage would remain intact, the potential extent of losses of demonstrably functionally, historically and visually connected landscape comprising the wider setting of the asset represents a major impact. This would likely approach substantial harm, given the cumulative effect of interacting layers of assets significance in forming a large-scale and relatively intact historic landscape. 7.26 Taking a precautionary approach, this is considered to be a high effect for the purposes of this assessment. 7.27 The same assertions hold for the non-designated elements of the place. Options for sustainable development 7.28 Development anywhere within the proposed allocation area will result in loss of functional and historical relationships between the asset and the area of water meadow or enclosures affected. Mitigation by design is not considered to be a realistic option if delivery of significant numbers of houses on site is required. While a small number of units could be accommodated in the extreme eastern extent of the site, this would need to be very carefully designed to sit down into the landscape but the comparatively flat site and open landscape does not lend itself to this type of intervention. Cumulative effects 7.34 When considered in combination with other proposed allocations (H2.2 and H2.4) H2.6 could result in significant urbanisation of the southern edge of Trowbridge. This would substantially reduce the current separation between the historic settlements of Southwick and North Bradley from suburban Trowbridge, in addition to eroding the significant and legible historic character of the landscape. The final summative comment is: Options for sustainable development 7.36 As indicated above, archaeological investigation to understand the extent, date and significance of in situ remains would be required; the results should inform an appropriate mitigation strategy in support of any planning application. This would be secured by condition. 7.37 Mitigation by design is not considered to be a realistic option if delivery of significant numbers of houses on site is required. Insertion of a small area of development in the eastern extremity of the site could potentially avoid the majority of effects, but may not be either viable or feasible on other grounds. (My highlights throughout) [See attachment for highlights] The conclusion is accompanied by this map, red being land to remain untouched: [See attachment for map] And the interpretation of this conclusion as presented to Cabinet and Council to inform their vote was presented as: In fact, the assessment concludes that less than substantial harm would likely result, albeit at a perceived higher end of the less than substantial harm scale. To paraphrase this interpretation: In actual fact the wording used to interpret a clear directive is speculative, misleading and does not appear in any conclusion in the independent report and the site has been adjudged to be at high risk and totally unsuited to any significant development. In the HRA assessment of the site commissioned by Wiltshire Council a determination of the site determined that due to its ecologically and environmentally sensitive nature the Lambrok stream and associated drainage features must be: Protected and/or buffered. This is in partial recognition of its significance as a natural corridor for wildlife, relied upon by some endangered species such as water voles and Bechstein bats and partially as recognition of the ongoing practical function as a flood plain. National body comment In response to the HRA document Natural England responded to Wiltshire Council with this determination: A range of onsite mitigation measures are proposed. However, it is not clear that these measures can be delivered while delivering the development requirements of the site. For example, can hedgerows be retained or will they need to be bisected by access roads etc.? If they cannot be delivered, it is not clear whether this invalidates the conclusions of the HRA. The onsite mitigation policy says Sensitive habitat features include: ... These features should be retained. The policy thus only protects the listed sensitive features, but not any unlisted

sensitive features. The HRA does not discuss whether this list of features covers the vast majority of features or otherwise quantified the proportion of features covered. It would give greater certainty to the HRA if it did. We note that the onsite mitigation policy requires 10-16m of native landscaping. It is not clear why these figures were chosen, and why there is such a spread in width. We suggest this is reviewed and justified, to provide greater certainty in the conclusions of the HRA. In the same response they also determine: In terms of site allocation policies, we have concerns around whether the allocations are consistent with the NPPF in the context of impacts on rights of way and open space, given what we perceive as a lack of implementation of relevant NPPF and Core Strategy policies (NPPF paras 74 and 75 and CP51) on comparable sites. As such, without confirmation that a robust approach will be taken to implementing these policies, we advise that the plan is unsound. (My bold and italic) The Environment agency has, in relation to this point, determined that a 20 metre environmental buffer be incorporated. This independent determination and specialist advice removes the access to the site from either the North or East. Access from the North, being through the residential property which the Council have pledged to respect in the plan as voted upon by Cabinet and Councillors, and through an important hedgerow protected in law and through a required environmental buffer (whatever the depth) is therefore neither practical or legal. This would also require acquiescence from The Town and Parish Councils who publicly oppose the site along with a separate license from the Environment Agency due to the notified flood plain and the associated drainage system. Access from the East, the A361, would also require cutting through hedgerow protected by the HRA assessment, Natural England requirements and disregarding the Heritage Impact Assessment. In addition a bridge/culvert would need to be constructed to protect not only the Heritage Asset as listed, but to ensure the lifetime surety from flooding as required by the NPPF sequential test. The site is presented as being of marginal sustainability and fails many of the tests set up for sustainability criteria, most notably access to infrastructure and transport links (a sporadic and limited bus service and distances of over 2km to both the centre of town and any rail service). Serious concerns have been raised in the HIA report and breaches of both law and regulation would have to be made. Conclusion Since the site was first put forward for consultation in the June 2017 Draft Housing Allocation Proposal many arguments based in fact have emerged mitigating against its sustainability. These take the form of legal proscriptions such as the 1997 Hedgerows Act and the Planning (Listed Buildings and Conservation Areas) Act 1990, direction from National bodies such as Natural England and the Environment Agency, procedural direction from the NPPF and from reports commissioned by Wiltshire Council at great cost to the public purse. This emerging evidence argues strongly that, had it been in the hands of Council Officers during the writing of the Draft, the site would have been deemed unsustainable and unsuited to development. The process in which we are all engaged is designed to seek the truth and to give weight to all evidence, irrespective of its source, but judged only on its validity. This presentation is referenced, logical and factual. It refers to a single site in a County wide process and must have occupied a proportionately small amount of assessment at its inclusion but which means immeasurably more to those who use and value it beyond its monetary value. It can only be hoped that, with the presentation of this interwoven evidence a true picture of the site as current recreational space, wildlife haven, functional flood plain and nationally important landscape it can be safeguarded. The descriptors in the above paragraph are those of agencies and Officers from whose hard work the argument above is developed and presented. Thank you for taking the time to consider and assess the above points. If at any point you feel that a visit to the site would be advantageous I would be happy to act as your guide. Bibliography Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A.9 Trowbridge Principal Settlement Wiltshire Council May 2018 Wiltshire Housing Site Allocations Plan Heritage impact assessment Final Report Prepared by LUC March 2018 <http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Submission%20July%202018/The%20Plan%20%26%20Supporting%20Documents&fileref=6> The 1997 Hedgerow act <https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management> 1793 Andrews and Durys map of Wiltshire Wiltshire & Swindon History Centre, Chippenham [http://www.wiltshirerecordsociety.org.uk/map/wrs\\_v08\\_index\\_map.jpg](http://www.wiltshirerecordsociety.org.uk/map/wrs_v08_index_map.jpg) CASE OFFICER'S REPORT 15/04570/FUL <https://unidoc.wiltshire.gov.uk/UniDoc/Document/Search/DSA,851321> <https://unidoc.wiltshire.gov.uk/UniDoc/Document/File/MTUvMDQ1NzAvRlVMLDY0NDcwNQ==> Wiltshire Housing Site Allocations Plan Pre-



	submission draft plan Habitat Regulations assessment (HRA) June 2017 WHSA%2520PSCONS10%2520Habitat%2520Regulations%2520Assessment%2520June%25202017[3917][3859].pdf Letters and emails from and to The Environment Agency, Natural England and the County Planning Archaeologist can be presented in full if required.		
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>	
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5152504		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	460	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Main Report (EXAM/02A)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	Referenced objections to site 3565 Introduction All information presented below is believed to be factual. All references made are listed in the body of the text and where possible are included in a bibliography complete with hyperlinks. Sources referenced are from Wiltshire County Policy, WCC Commissioned consultants reports, Natural				

**Assessment Addendum  
(September 2018).**

England, The Environment Agency, Wiltshire County Officers Reports, DEFRA, Wiltshire County Planning Archaeologist and currently applicable NPPF direction.

Argument

Site 3565 is unsuitable for development and unsustainable

Description

Site 3565 (Fields adjacent to Southwick Court) lies mostly in the Parish of Southwick, and partly in the Parish of North Bradley, just outside of the County Town of Trowbridge (Grid Ref ST 84776 55992). On the Northern side of the site lies a stream and brook network which is defined by a hedgerow dating to at least 1795. The hedgerow is protected by the 1997 Hedgerows act under several set criteria as an Important hedgerow. A majority of this hedgerow is also protected by tree protection orders and contains a brook which intersects with the Lambrok Stream. The Northern side of this hedgerow lies within the town of Trowbridge, the Southern within the Parish of Southwick. As the Sustainability Appraisal states:

“The land serves to separate Trowbridge from the village of Southwick. As such, development would potentially threaten the separate identity of Southwick and intrinsic quality of the countryside.”

Which runs contrary to Core Policy 29 and should immediately render the site invalid.

To the immediate North of this protected hedgerow lies a variety of developments, the majority dating back to the 1970's with some as recently constructed as the late 1990's. These consist of a variety of building styles but are well screened from both the rolling landscape and the protected Heritage assets beyond. Without exception they are constructed within the boundary of the town of Trowbridge. The current built form has been protected within the Housing Site allocation document in which it pledges to respect the current form. This takes the shape of a number of cul-de-sac's which define the town boundary with the proposed site.

The proposed site is bisected on a North-South line by the protected Lambrok Stream. This divides the site into two portions, the westernmost third which is directly adjacent to the A361 and the easternmost two thirds. The stream feeds directly into the stream and brook running along the hedgerow and is bounded by significant level two and three flood plains. This is exacerbated by a drop-off of approximately three metres from the Southern extreme of the proposed site to the Northern boundary demarcated by the Hedgerow and stream.

The Lambrok stream floods on a regular basis which then impacts on the brook and stream feature running along the Parish boundary. The system takes surface water runoff from several hundred yards away from the properties to the North of Silver Street Lane some hundred and fifty metres upslope to the North. This flooding directly impacts on the entire North-South axis of the site and affects the entirety of the drop-off. A consequence of this flooding is to force both surface water and untreated sewage out of the drains in the nearby housing developments.

The immediate South of the site is bounded by the Lambrok Stream and is also classified as being predominantly level two and three flood plain. The majority of the land between these areas of notified flood plain is classified as suffering from build-up of excessive surface water.

To the South West of the site lie the two registered Heritage Assets of Southwick Court and it's separately listed moat. These are informed and contextualised by the site itself which contains earthworks associated with the Assets from the post-medieval period. The moat feature is fed and

supported by the managed and developed geology and fieldworks which are a part of the Lambrok stream. Independent consultants have recognised the interdependency of these features and the reliance of the one on the other.

A field to the South-East of the proposed site has been noted to have damaged the context of the Listed Assets with the construction of a solar farm. Whilst this is not visible from the Assets, it has impacted on the managed landscape and associated ancillary buildings related to the Assets. The proposed development is directly adjacent to the Assets themselves.

To the immediate South-East lie Bramble Farm. This land is currently used for cattle farming as is the site itself which is worked on a tenancy basis. Access to Bramble Farm is by a part shingled and part earthen trackway known as Axe and Cleaver Lane.

The proposed site itself is currently used for a mix of the aforementioned cattle farming, informal recreation and leisure, and houses a number of public footpaths. The footpaths lead to the nearby villages of Southwick and North Bradley and on to the villages of Wingfield and Hoggington. Current OS maps include three footpaths, but DMMO procedures are currently in place for two others with documentary evidence showing their unrestricted use for thirty years.

Use of the site for dwellings will therefore increase flooding suffered by current dwelling invalidating the Environment Agency requirement for 'lifetime certainty' of freedom from flooding and fail NPPF sequential testing. The use of the site will irreparably damage Heritage assets, described by consultants as:

"Nationally important"

(Wiltshire Housing Sites Allocations Plan: Historic impact assessment 7.15)

Finally, access to the site will either involve cutting through a level three flood plain and protected hedgerow.

Or

Cutting through Important Hedgerow protected by the 1997 Hedgrows Act and invalidating the terms of the proposed plan as voted into being by Cabinet and Councillors.

Or

Cutting a road from Southwick village across landscape integral to listed Heritage Assets.

Or

Enacting a Compulsory Purchase Order to develop Axe and Cleaver Lane to make it fit for vehicular traffic.

Legislative, Factual and Policy issues

Legislative

The 1997 Hedgerow act specifically forbids the permanent destruction or removal of an 'Important' hedgerow. A link provided by DEFRA is here:

<https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>

The hedgerow running to the immediate North of the site, forming the boundary between Trowbridge and Southwick is show on the 1793 Andrews and Durys map of Wiltshire and can be found in the Wiltshire & Swindon History Centre, Chippenham. A link to this map appears in the bibliography and a detail is reproduced below:

[See attachement for map]

This unequivocally dates the boundary and is sufficient, along with other set criteria such as the presence of a watercourse, footpath and broad leafed species, to meet the criteria.

Despite permission granted in advance of any application by the County arboricultural Officer to cut through this hedgerow:

“There has been a site meeting with various interested parties who have expressed a clear desire not to remove any trees or any parts of the existing hedge other than one small section to make way for an emergency access route with lockable bollards on both sides of the proposed route. They will include this within a tree survey and recommendations and should the development gain consent, they would be permitted to remove the small, 7m section of hedge.”

This hedgerow is protected under legislation. No order needs to me made to confer this status in law, just the meeting of the criteria.

- It marks a pre-1850 parish or township boundary (criterion a)
- It incorporates an archaeological feature (post medieval earthworks) as noted in the Proposal and confirmed by the Planning Archaeologist (email in appendix C) (criterion 2/3).
- The hedgerow is associated with a pre-1600 estate or manor (criterion 4)
- Contains certain categories of species of bird, animals or plants listed in the Wildlife and Countryside Act or Joint Nature Conservation Committee (JNCC) publications.
- Runs alongside a bridleway, footpath, road used as a public path, or a byway open to all traffic and includes at least 4 woody species, on average, in a 30m length and has at least 2 of the associated features listed at (i) or (v) below. The associated features are:
  - i. A bank or wall supporting the hedgerow.
  - ii. Less than 10% gaps.
  - iii. On average, at least one tree per 50m.
  - iv. At least 3 species from a list of 57 woodland plants.

v. v.A ditch.

vi. A number of connections with other hedgerows, ponds or woodland.

vii. A parallel hedge within 15m.

The act states that the hedgerow cannot be removed and can only be temporarily broken through if the work is for defence of the realm or for public safety reasons and only if there is no other access. If a breakthrough has to occur it must be no wider than 20 metres and replaced as soon as the work is complete.

Furthermore it is clearly stated that:

“ The presumption is in favour of protecting and retaining important hedgerows” (The hedgerow regulations 1997 1.7)

“the removal(1) of a hedgerow to which these Regulations apply is prohibited” (The hedgerow regulations 1997 5.0)

This removes access from the town of Trowbridge.

Paragraph 170 of the current NPPF regulations states that:

A functional floodplain is a very important planning tool in making space for flood waters when flooding occurs. Generally, development should be directed away from these areas using the Environment Agency’s catchment flood management plans, shoreline management plans and local flood risk management strategies produced by lead local flood authorities.

The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. Areas which would naturally flood, but which are prevented from doing so by existing defences and infrastructure or solid buildings, will not normally be identified as functional floodplain. If an area is intended to flood, eg an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often.

Paragraph: 015 Reference ID: 7-015-20140306

This photograph illustrates the nature of the functional flood plain as shown in the Environment Agency “South Court Farm” map. The photograph was taken on the upper portion of the flood plain itself.

[See attachement for photograph]

The building in the background being Southwick Court Farm and the wooden structure in the middle ground the corral indicated on the same photograph. This is at the high point of a drop off of approximately two metres to the hedge junction at the bottom left of the photo (Northern fringe of the site).

This photograph was taken from approximately this point on the satellite image:

[See attachment for map]

This is the Environment Agency Flood plain assessment (two footpaths appearing on OS maps are absent from this map but run from the current built form, these are not currently disputed or subject to DMMO Process):

[See attachment for map]

Current flood events have had this impact in nearby properties:

Policy

Wiltshire Policy CR1, contained within the January 2009 Leisure and Recreation Development Plan Document states that:

“The public rights of way network will be protected from development for other land uses and extensions and improvements will be sought, where appropriate, as part of development proposals.”

This recognition goes further and an Officer report relating to the Solar Farm constructed in another section of the Southwick Court estate reads:

“The Planning (Listed Buildings and Conservation Areas) Act 1990 to give special regard to the “desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” (S16 and 66). Paragraph 132 of the NPPF states that “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. ... Significance can be harmed or lost through ... development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.” Core Policy 58 of the Wiltshire Core Strategy echoes the above national policy in seeking the protection, conservation and, where possible, enhancement of listed buildings.”

As will be illustrated this policy is not upheld when the HIA report is considered.

The proposed site contains three notified footpaths as set out in OS maps and a further two-long standing trackways are the subject of DMMO applications at this time. When Natural England comments made to Wiltshire Council in their response to the Housing Allocation Proposal are taken into consideration:

“We note that a high proportion of the proposed sites are land which is either bisected or bounded by public rights of way or is used for recreational purposes as open space. Development of these sites is likely to detrimentally affect the recreational value of these features. (C.f. NPPF paras 74. Existing open space...should not be built on unless... and 75. Planning policies should protect and enhance public rights of way and access.). We note that the Wiltshire Core Strategy says (CP51 – green infrastructure)

“If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required. Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.”

We are unaware of any such audits being undertaken since the Core Strategy was adopted, and our impression is that, compensatory provision has rarely, if ever, been made.”

This demonstrates the determination of an independent body in the assessment of the aspect of the site which is relevant here.

The Sustainability Assessment defines the site as being used for informal recreation. A survey delivered average daily usage as being between 100 and 120 individuals. Furthermore Natural England responded to Wiltshire Council by stating that:

“It is not clear how public rights of way and valued open space has been considered in the Sustainability Appraisal. While they feature under objective 7, (will the policy protect rights of way, open space and common land?), a word search shows that right/rights of way is only mentioned 3 times in the site assessments, while existing open space is mentioned only twice.”

In its own assessment of the site Wiltshire Council describe the site in the following words:

“This is recreational or amenity space at the edge of a settlement that relates more closely to the built environment.

Core Policy 29 and the supporting text (paragraph 5.150) of the WCS identify specific issues to be addressed in planning for the Trowbridge Community Area, including:

“It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities.”

“All development in Trowbridge should be sensitive to constraints, such as the local County Wildlife Sites, SSSIs, Ancient Woodland, the Western Wiltshire Greenbelt and areas at risk of flooding”

This site is within Southwick, but abutting Trowbridge thereby removing that separation entirely and both contains, and is bounded by, areas not only at risk of flooding, but which currently flood on a regular basis.

Independent adjudication

WCC commissioned reports

The Sustainability assessment commissioned by Wiltshire Council (Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Annex 1, A.9 Trowbridge Principal Settlement) is confusing and as a document presented to both Cabinet and Council for two discrete votes talks of housing density of both 280 and 237 dwellings. The Housing Allocation Proposal suggests 180 as the density for this site. Despite this the site is continually referred to as being on the North of the town. The inference being that the site is within the boundary of the Town and not the village.

Paragraph 157 of the current NPPF states that:

Crucially, Local Plans should:



“Identify land where development would be inappropriate, for instance because of its environmental or historic significance”

The County Planning Archaeologist has reported in June 2017 that:

“I have previously provided screening opinion advice for this site to the planning team. I highlighted that The Wiltshire and Swindon Historic Environment Record shows that a number of features have been plotted within the proposed development site which relate to a post-medieval water meadow system. Southwick Court Farm lies immediately south of the proposed development site and contains a number of important heritage assets including a medieval moated site with a medieval farmstead of which the farmhouse is a Grade II\* Listed Building (national ref. 1194818) dating from 1567 to 1599. I therefore raised the need to have a full assessment of the impacts on the heritage assets in particular on the water meadows and Grade II\* Listed Building.

Without further assessment I cannot advise on the appropriateness of the development but I would say that putting 180 houses will have an impact on a number of heritage assets.”

The Sustainability Assessment advises strongly that an independent Heritage Impact Assessment be made of the site. At the time of presentation of the Sustainability Assessment such a report had been made and presented. The section pertaining to this site runs for seven pages including a map and I have taken the liberty of adding a link in the bibliography to this document in which seven pages relate to this site.

In an attempt to present the significance of this document to the argument I reproduce a number of direct quotations here:

7.16 Setting makes a critical contribution to the significance of both assets, relating in the first instance to their immediate setting within the earlier – intact and functional – moated enclosure. The relationship to the later farm buildings outside the moat adds to the historical value in supplying the most recent agricultural chapter in the narrative of a site continuously occupied for around 600 years. The relationship to the wider landscape also contributes to the significance of the assets.

7.17 Similarly, the relationship of the asset group to the wider agricultural hinterland is important, as currently it stands in ‘splendid isolation’ as the one prominent feature – delineated in part by the trees following the moat boundary – in a sizeable tract of open agricultural landscape. The asset and its wider setting should therefore be considered to be an archaeological landscape of considerable importance. For example, the open space around the asset allows a clear understanding of the hierarchy of the 16th/17th century farmsteads in the immediate vicinity.

7.18 A Functional and historical connection with this agricultural landscape can therefore be established which elevates its importance in terms of contribution to these values and the assets’ setting.

7.20 The designated assets are of high importance, reflecting their national significance. The moat itself should be viewed as being indivisible from the significance of the designated features and, in its own right, likely to be of equivalent significance to a Scheduled Monument<sup>18</sup>.

7.23 Change in the wider landscape of the proposed site is likely to have two main effects. Firstly, it has the potential to sever the functional and historical links between the moated site and particularly the farmhouse with the contemporary water meadows that were likely integral to the 16th century enhancement of the place, and with the later enclosure landscape that forms its agricultural hinterland. Secondly, development has the potential to change the ability to appreciate the assets’ relatively prominent position in the local landscape. It stands on a small area of slightly elevated ground, in ‘splendid isolation’ from the surrounding historic villages – reflecting its origins as an isolated farm centre.

#### Risk of harm

7.24 Development of the entire proposed allocation would completely sever the assets from their landscape and economic/historical context. This would result in harm to the significance of the asset. Similarly, development would be likely to reduce the legibility of the asset as an isolated manorial farm, and change its prominence in the local landscape. The historical landholdings of the assets have already been harmed by development, particularly the large-scale intrusion created by the nearby solar farm.

7.25 While the core of the assets' relationships and setting – i.e. between the individual built elements and the archaeological heritage – would remain intact, the potential extent of losses of demonstrably functionally, historically and visually connected landscape comprising the wider setting of the asset represents a major impact. This would likely approach substantial harm, given the cumulative effect of interacting layers of asset's significance in forming a large-scale and relatively intact historic landscape.

7.26 Taking a precautionary approach, this is considered to be a high effect for the purposes of this assessment.

7.27 The same assertions hold for the non-designated elements of the place.

#### Options for sustainable development

7.28 Development anywhere within the proposed allocation area will result in loss of functional and historical relationships between the asset and the area of water meadow or enclosures affected.

Mitigation by design is not considered to be a realistic option if delivery of significant numbers of houses on site is required. While a small number of units could be accommodated in the extreme eastern extent of the site, this would need to be very carefully designed to 'sit down' into the landscape – but the comparatively flat site and open landscape does not lend itself to this type of intervention.

#### Cumulative effects

7.34 When considered in combination with other proposed allocations (H2.2 and H2.4) H2.6 could result in significant urbanisation of the southern edge of Trowbridge. This would substantially reduce the current separation between the historic settlements of Southwick and North Bradley from suburban Trowbridge, in addition to eroding the significant and legible historic character of the landscape.

The final summative comment is:

#### Options for sustainable development

7.36 As indicated above, archaeological investigation to understand the extent, date and significance of in situ remains would be required; the results should inform an appropriate mitigation strategy in support of any planning application. This would be secured by condition.

7.37 Mitigation by design is not considered to be a realistic option if delivery of significant numbers of houses on site is required. Insertion of a small area of development in the eastern extremity of the site could potentially avoid the majority of effects, but may not be either viable or feasible on other grounds.

(My highlights throughout) [See attachment for highlights]

The conclusion is accompanied by this map, red being land to remain untouched:

[See attachment for map]

And the interpretation of this conclusion as presented to Cabinet and Council to inform their vote was presented as:

“In fact, the assessment concludes that less than substantial harm would likely result, albeit at a perceived higher end of the less than substantial harm scale.”

To paraphrase this interpretation:

“In actual fact the wording used to interpret a clear directive is speculative, misleading and does not appear in any conclusion in the independent report and the site has been adjudged to be at high risk and totally unsuited to any significant development”

In the HRA assessment of the site commissioned by Wiltshire Council a determination of the site determined that due to its ecologically and environmentally sensitive nature the Lambrook stream and associated drainage features must be:

“Protected and/or buffered”

This is in partial recognition of its significance as a natural corridor for wildlife, relied upon by some endangered species such as water voles and Bechstein bats and partially as recognition of the ongoing practical function as a flood plain.

National body comment

In response to the HRA document Natural England responded to Wiltshire Council with this determination:

“A range of onsite mitigation measures are proposed. However, it is not clear that these measures can be delivered while delivering the development requirements of the site. For example, can hedgerows be retained or will they need to be bisected by access roads etc.? If they cannot be delivered, it is not clear whether this invalidates the conclusions of the HRA.

The onsite mitigation policy says “Sensitive habitat features...include: ... These features should be retained...”. The policy thus only protects the listed sensitive features, but not any unlisted sensitive features. The HRA does not discuss whether this list of features covers the vast majority of features or otherwise quantified the proportion of features covered. It would give greater certainty to the HRA if it did.

We note that the onsite mitigation policy requires 10-16m of native landscaping. It is not clear why these figures were chosen, and why there is such a spread in width. We suggest this is reviewed and justified, to provide greater certainty in the conclusions of the HRA.”

In the same response they also determine:

“In terms of site allocation policies, we have concerns around whether the allocations are consistent with the NPPF in the context of impacts on rights of way and open space, given what we perceive as a lack of implementation of relevant NPPF and Core Strategy policies (NPPF paras 74

and 75 and CP51) on comparable sites. As such, without confirmation that a robust approach will be taken to implementing these policies, we advise that the plan is unsound." (My bold and italic)

The Environment agency has, in relation to this point, determined that a 20 metre environmental buffer be incorporated.

This independent determination and specialist advice removes the access to the site from either the North or East.

Access from the North, being through the residential property which the Council have pledged to respect in the plan as voted upon by Cabinet and Councillors, and through an important hedgerow protected in law and through a required environmental buffer (whatever the depth) is therefore neither practical or legal. This would also require acquiescence from The Town and Parish Councils who publicly oppose the site along with a separate license from the Environment Agency due to the notified flood plain and the associated drainage system.

Access from the East, the A361, would also require cutting through hedgerow protected by the HRA assessment, Natural England requirements and disregarding the Heritage Impact Assessment. In addition a bridge/culvert would need to be constructed to protect not only the Heritage Asset as listed, but to ensure the lifetime surety from flooding as required by the NPPF sequential test.

The site is presented as being of marginal sustainability and fails many of the tests set up for sustainability criteria, most notably access to infrastructure and transport links (a sporadic and limited bus service and distances of over 2km to both the centre of town and any rail service). Serious concerns have been raised in the HIA report and breaches of both law and regulation would have to be made.

#### Conclusion

Since the site was first put forward for consultation in the June 2017 Draft Housing Allocation Proposal many arguments based in fact have emerged mitigating against its sustainability. These take the form of legal proscriptions such as the 1997 Hedgerows Act and the Planning (Listed Buildings and Conservation Areas) Act 1990, direction from National bodies such as Natural England and the Environment Agency, procedural direction from the NPPF and from reports commissioned by Wiltshire Council at great cost to the public purse.

This emerging evidence argues strongly that, had it been in the hands of Council Officers during the writing of the Draft, the site would have been deemed unsustainable and unsuited to development. The process in which we are all engaged is designed to seek the truth and to give weight to all evidence, irrespective of its source, but judged only on its validity.

This presentation is referenced, logical and factual. It refers to a single site in a County wide process and must have occupied a proportionately small amount of assessment at its inclusion but which means immeasurably more to those who use and value it beyond its monetary value. It can only be hoped that, with the presentation of this interwoven evidence a true picture of the site as current recreational space, wildlife haven, functional flood plain and nationally important landscape it can be safeguarded.

The descriptors in the above paragraph are those of agencies and Officers from whose hard work the argument above is developed and presented.

Thank you for taking the time to consider and assess the above points. If at any point you feel that a visit to the site would be advantageous I would be happy to act as your guide.

Bibliography

- Wiltshire Housing Site Allocations Plan

Sustainability Appraisal Report

Annex 1 A.9 Trowbridge Principal Settlement

Wiltshire Council

May 2018

- Wiltshire Housing Site Allocations Plan

Heritage impact assessment

Final Report Prepared by LUC March 2018

<http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Submission%20July%202018/The%20Plan%20%26%20Supporting%20Documents&fileref=6>

- The 1997 Hedgerow act

<https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>

- 1793 Andrews and Durys map of Wiltshire

Wiltshire & Swindon History Centre, Chippenham

[http://www.wiltshirerecordsociety.org.uk/map/wrs\\_v08\\_index\\_map.jpg](http://www.wiltshirerecordsociety.org.uk/map/wrs_v08_index_map.jpg)

- CASE OFFICER'S REPORT

15/04570/FUL

<https://unidoc.wiltshire.gov.uk/UniDoc/Document/Search/DSA,851321>

<https://unidoc.wiltshire.gov.uk/UniDoc/Document/File/MTUvMDQ1NzAvRlVMDY0NDcwNQ==>

- Wiltshire Housing Site Allocations Plan Pre-submission draft plan

Habitat Regulations assessment (HRA)

	<p>June 2017</p> <p>WWSA%2520PSCONS10%2520Habitat%2520Regulations%2520Assessment%2520June%25202017[3917][3859].pdf</p> <ul style="list-style-type: none"> <li>• Letters and emails from and to The Environment Agency, Natural England and the County Planning Archaeologist can be presented in full if required.</li> </ul>		
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5152504		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	461	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Sustainability Appraisal September 2018 - Main Report (EXAM/02A)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	Referenced objections to site 3565 Introduction All information presented below is believed to be factual. All references made are listed in the body of the text and where possible are included in a bibliography complete with hyperlinks. Sources referenced are from Wiltshire County Policy, WCC Commissioned consultants reports, Natural				

**Assessment Addendum  
(September 2018).**

England, The Environment Agency, Wiltshire County Officers Reports, DEFRA, Wiltshire County Planning Archaeologist and currently applicable NPPF direction.

Argument

Site 3565 is unsuitable for development and unsustainable

Description

Site 3565 (Fields adjacent to Southwick Court) lies mostly in the Parish of Southwick, and partly in the Parish of North Bradley, just outside of the County Town of Trowbridge (Grid Ref ST 84776 55992). On the Northern side of the site lies a stream and brook network which is defined by a hedgerow dating to at least 1795. The hedgerow is protected by the 1997 Hedgerows act under several set criteria as an Important hedgerow. A majority of this hedgerow is also protected by tree protection orders and contains a brook which intersects with the Lambrok Stream. The Northern side of this hedgerow lies within the town of Trowbridge, the Southern within the Parish of Southwick. As the Sustainability Appraisal states:

“The land serves to separate Trowbridge from the village of Southwick. As such, development would potentially threaten the separate identity of Southwick and intrinsic quality of the countryside.”

Which runs contrary to Core Policy 29 and should immediately render the site invalid.

To the immediate North of this protected hedgerow lies a variety of developments, the majority dating back to the 1970's with some as recently constructed as the late 1990's. These consist of a variety of building styles but are well screened from both the rolling landscape and the protected Heritage assets beyond. Without exception they are constructed within the boundary of the town of Trowbridge. The current built form has been protected within the Housing Site allocation document in which it pledges to respect the current form. This takes the shape of a number of cul-de-sac's which define the town boundary with the proposed site.

The proposed site is bisected on a North-South line by the protected Lambrok Stream. This divides the site into two portions, the westernmost third which is directly adjacent to the A361 and the easternmost two thirds. The stream feeds directly into the stream and brook running along the hedgerow and is bounded by significant level two and three flood plains. This is exacerbated by a drop-off of approximately three metres from the Southern extreme of the proposed site to the Northern boundary demarcated by the Hedgerow and stream.

The Lambrok stream floods on a regular basis which then impacts on the brook and stream feature running along the Parish boundary. The system takes surface water runoff from several hundred yards away from the properties to the North of Silver Street Lane some hundred and fifty metres upslope to the North. This flooding directly impacts on the entire North-South axis of the site and affects the entirety of the drop-off. A consequence of this flooding is to force both surface water and untreated sewage out of the drains in the nearby housing developments.

The immediate South of the site is bounded by the Lambrok Stream and is also classified as being predominantly level two and three flood plain. The majority of the land between these areas of notified flood plain is classified as suffering from build-up of excessive surface water.

To the South West of the site lie the two registered Heritage Assets of Southwick Court and it's separately listed moat. These are informed and contextualised by the site itself which contains earthworks associated with the Assets from the post-medieval period. The moat feature is fed and



supported by the managed and developed geology and fieldworks which are a part of the Lambrok stream. Independent consultants have recognised the interdependency of these features and the reliance of the one on the other.

A field to the South-East of the proposed site has been noted to have damaged the context of the Listed Assets with the construction of a solar farm. Whilst this is not visible from the Assets, it has impacted on the managed landscape and associated ancillary buildings related to the Assets. The proposed development is directly adjacent to the Assets themselves.

To the immediate South-East lie Bramble Farm. This land is currently used for cattle farming as is the site itself which is worked on a tenancy basis. Access to Bramble Farm is by a part shingled and part earthen trackway known as Axe and Cleaver Lane.

The proposed site itself is currently used for a mix of the aforementioned cattle farming, informal recreation and leisure, and houses a number of public footpaths. The footpaths lead to the nearby villages of Southwick and North Bradley and on to the villages of Wingfield and Hoggington. Current OS maps include three footpaths, but DMMO procedures are currently in place for two others with documentary evidence showing their unrestricted use for thirty years.

Use of the site for dwellings will therefore increase flooding suffered by current dwelling invalidating the Environment Agency requirement for 'lifetime certainty' of freedom from flooding and fail NPPF sequential testing. The use of the site will irreparably damage Heritage assets, described by consultants as:

"Nationally important"

(Wiltshire Housing Sites Allocations Plan: Historic impact assessment 7.15)

Finally, access to the site will either involve cutting through a level three flood plain and protected hedgerow.

Or

Cutting through Important Hedgerow protected by the 1997 Hedgrows Act and invalidating the terms of the proposed plan as voted into being by Cabinet and Councillors.

Or

Cutting a road from Southwick village across landscape integral to listed Heritage Assets.

Or

Enacting a Compulsory Purchase Order to develop Axe and Cleaver Lane to make it fit for vehicular traffic.

Legislative, Factual and Policy issues

Legislative

The 1997 Hedgerow act specifically forbids the permanent destruction or removal of an 'Important' hedgerow. A link provided by DEFRA is here:

<https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>

The hedgerow running to the immediate North of the site, forming the boundary between Trowbridge and Southwick is show on the 1793 Andrews and Durys map of Wiltshire and can be found in the Wiltshire & Swindon History Centre, Chippenham. A link to this map appears in the bibliography and a detail is reproduced below:

[See attachment for map]

This unequivocally dates the boundary and is sufficient, along with other set criteria such as the presence of a watercourse, footpath and broad leafed species, to meet the criteria.

Despite permission granted in advance of any application by the County arboricultural Officer to cut through this hedgerow:

“There has been a site meeting with various interested parties who have expressed a clear desire not to remove any trees or any parts of the existing hedge other than one small section to make way for an emergency access route with lockable bollards on both sides of the proposed route. They will include this within a tree survey and recommendations and should the development gain consent, they would be permitted to remove the small, 7m section of hedge.”

This hedgerow is protected under legislation. No order needs to me made to confer this status in law, just the meeting of the criteria.

- It marks a pre-1850 parish or township boundary (criterion a)
- It incorporates an archaeological feature (post medieval earthworks) as noted in the Proposal and confirmed by the Planning Archaeologist (email in appendix C) (criterion 2/3).
- The hedgerow is associated with a pre-1600 estate or manor (criterion 4)
- Contains certain categories of species of bird, animals or plants listed in the Wildlife and Countryside Act or Joint Nature Conservation Committee (JNCC) publications.
- Runs alongside a bridleway, footpath, road used as a public path, or a byway open to all traffic and includes at least 4 woody species, on average, in a 30m length and has at least 2 of the associated features listed at (i) or (v) below. The associated features are:
  - i. A bank or wall supporting the hedgerow.
  - ii. Less than 10% gaps.
  - iii. On average, at least one tree per 50m.
  - iv. At least 3 species from a list of 57 woodland plants.

v. v.A ditch.

vi. A number of connections with other hedgerows, ponds or woodland.

vii. A parallel hedge within 15m.

The act states that the hedgerow cannot be removed and can only be temporarily broken through if the work is for defence of the realm or for public safety reasons and only if there is no other access. If a breakthrough has to occur it must be no wider than 20 metres and replaced as soon as the work is complete.

Furthermore it is clearly stated that:

“ The presumption is in favour of protecting and retaining important hedgerows” (The hedgerow regulations 1997 1.7)

“the removal(1) of a hedgerow to which these Regulations apply is prohibited” (The hedgerow regulations 1997 5.0)

This removes access from the town of Trowbridge.

Paragraph 170 of the current NPPF regulations states that:

A functional floodplain is a very important planning tool in making space for flood waters when flooding occurs. Generally, development should be directed away from these areas using the Environment Agency’s catchment flood management plans, shoreline management plans and local flood risk management strategies produced by lead local flood authorities.

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Paragraph: 015 Reference ID: 7-015-20140306

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This demonstrates the determination of an independent body in the assessment of the aspect of the site which is relevant here.

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“It is not clear how public rights of way and valued open space has been considered in the Sustainability Appraisal. While they feature under objective 7, (will the policy protect rights of way, open space and common land?), a word search shows that right/rights of way is only mentioned 3 times in the site assessments, while existing open space is mentioned only twice.”

In its own assessment of the site Wiltshire Council describe the site in the following words:

“This is recreational or amenity space at the edge of a settlement that relates more closely to the built environment.

Core Policy 29 and the supporting text (paragraph 5.150) of the WCS identify specific issues to be addressed in planning for the Trowbridge Community Area, including:

“It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities.”

“All development in Trowbridge should be sensitive to constraints, such as the local County Wildlife Sites, SSSIs, Ancient Woodland, the Western Wiltshire Greenbelt and areas at risk of flooding”

This site is within Southwick, but abutting Trowbridge thereby removing that separation entirely and both contains, and is bounded by, areas not only at risk of flooding, but which currently flood on a regular basis.

Independent adjudication

WCC commissioned reports

The Sustainability assessment commissioned by Wiltshire Council (Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Annex 1, A.9 Trowbridge Principal Settlement) is confusing and as a document presented to both Cabinet and Council for two discrete votes talks of housing density of both 280 and 237 dwellings. The Housing Allocation Proposal suggests 180 as the density for this site. Despite this the site is continually referred to as being on the North of the town. The inference being that the site is within the boundary of the Town and not the village.

Paragraph 157 of the current NPPF states that:

Crucially, Local Plans should:

“Identify land where development would be inappropriate, for instance because of its environmental or historic significance”

The County Planning Archaeologist has reported in June 2017 that:

“I have previously provided screening opinion advice for this site to the planning team. I highlighted that The Wiltshire and Swindon Historic Environment Record shows that a number of features have been plotted within the proposed development site which relate to a post-medieval water meadow system. Southwick Court Farm lies immediately south of the proposed development site and contains a number of important heritage assets including a medieval moated site with a medieval farmstead of which the farmhouse is a Grade II\* Listed Building (national ref. 1194818) dating from 1567 to 1599. I therefore raised the need to have a full assessment of the impacts on the heritage assets in particular on the water meadows and Grade II\* Listed Building.

Without further assessment I cannot advise on the appropriateness of the development but I would say that putting 180 houses will have an impact on a number of heritage assets.”

The Sustainability Assessment advises strongly that an independent Heritage Impact Assessment be made of the site. At the time of presentation of the Sustainability Assessment such a report had been made and presented. The section pertaining to this site runs for seven pages including a map and I have taken the liberty of adding a link in the bibliography to this document in which seven pages relate to this site.

In an attempt to present the significance of this document to the argument I reproduce a number of direct quotations here:

7.16 Setting makes a critical contribution to the significance of both assets, relating in the first instance to their immediate setting within the earlier – intact and functional – moated enclosure. The relationship to the later farm buildings outside the moat adds to the historical value in supplying the most recent agricultural chapter in the narrative of a site continuously occupied for around 600 years. The relationship to the wider landscape also contributes to the significance of the assets.

7.17 Similarly, the relationship of the asset group to the wider agricultural hinterland is important, as currently it stands in ‘splendid isolation’ as the one prominent feature – delineated in part by the trees following the moat boundary – in a sizeable tract of open agricultural landscape. The asset and its wider setting should therefore be considered to be an archaeological landscape of considerable importance. For example, the open space around the asset allows a clear understanding of the hierarchy of the 16th/17th century farmsteads in the immediate vicinity.

7.18 A Functional and historical connection with this agricultural landscape can therefore be established which elevates its importance in terms of contribution to these values and the assets’ setting.

7.20 The designated assets are of high importance, reflecting their national significance. The moat itself should be viewed as being indivisible from the significance of the designated features and, in its own right, likely to be of equivalent significance to a Scheduled Monument<sup>18</sup>.

7.23 Change in the wider landscape of the proposed site is likely to have two main effects. Firstly, it has the potential to sever the functional and historical links between the moated site and particularly the farmhouse with the contemporary water meadows that were likely integral to the 16th century enhancement of the place, and with the later enclosure landscape that forms its agricultural hinterland. Secondly, development has the potential to change the ability to appreciate the assets’ relatively prominent position in the local landscape. It stands on a small area of slightly elevated ground, in ‘splendid isolation’ from the surrounding historic villages – reflecting its origins as an isolated farm centre.

#### Risk of harm

7.24 Development of the entire proposed allocation would completely sever the assets from their landscape and economic/historical context. This would result in harm to the significance of the asset. Similarly, development would be likely to reduce the legibility of the asset as an isolated manorial farm, and change its prominence in the local landscape. The historical landholdings of the assets have already been harmed by development, particularly the large-scale intrusion created by the nearby solar farm.

7.25 While the core of the assets' relationships and setting – i.e. between the individual built elements and the archaeological heritage – would remain intact, the potential extent of losses of demonstrably functionally, historically and visually connected landscape comprising the wider setting of the asset represents a major impact. This would likely approach substantial harm, given the cumulative effect of interacting layers of asset's significance in forming a large-scale and relatively intact historic landscape.

7.26 Taking a precautionary approach, this is considered to be a high effect for the purposes of this assessment.

7.27 The same assertions hold for the non-designated elements of the place.

#### Options for sustainable development

7.28 Development anywhere within the proposed allocation area will result in loss of functional and historical relationships between the asset and the area of water meadow or enclosures affected.

Mitigation by design is not considered to be a realistic option if delivery of significant numbers of houses on site is required. While a small number of units could be accommodated in the extreme eastern extent of the site, this would need to be very carefully designed to 'sit down' into the landscape – but the comparatively flat site and open landscape does not lend itself to this type of intervention.

#### Cumulative effects

7.34 When considered in combination with other proposed allocations (H2.2 and H2.4) H2.6 could result in significant urbanisation of the southern edge of Trowbridge. This would substantially reduce the current separation between the historic settlements of Southwick and North Bradley from suburban Trowbridge, in addition to eroding the significant and legible historic character of the landscape.

The final summative comment is:

#### Options for sustainable development

7.36 As indicated above, archaeological investigation to understand the extent, date and significance of in situ remains would be required; the results should inform an appropriate mitigation strategy in support of any planning application. This would be secured by condition.

7.37 Mitigation by design is not considered to be a realistic option if delivery of significant numbers of houses on site is required. Insertion of a small area of development in the eastern extremity of the site could potentially avoid the majority of effects, but may not be either viable or feasible on other grounds.

(My highlights throughout) [See attachment for highlights]

The conclusion is accompanied by this map, red being land to remain untouched:

[See attachment for map]

And the interpretation of this conclusion as presented to Cabinet and Council to inform their vote was presented as:

“In fact, the assessment concludes that less than substantial harm would likely result, albeit at a perceived higher end of the less than substantial harm scale.”

To paraphrase this interpretation:

“In actual fact the wording used to interpret a clear directive is speculative, misleading and does not appear in any conclusion in the independent report and the site has been adjudged to be at high risk and totally unsuited to any significant development”

In the HRA assessment of the site commissioned by Wiltshire Council a determination of the site determined that due to its ecologically and environmentally sensitive nature the Lambrook stream and associated drainage features must be:

“Protected and/or buffered”

This is in partial recognition of its significance as a natural corridor for wildlife, relied upon by some endangered species such as water voles and Bechstein bats and partially as recognition of the ongoing practical function as a flood plain.

National body comment

In response to the HRA document Natural England responded to Wiltshire Council with this determination:

“A range of onsite mitigation measures are proposed. However, it is not clear that these measures can be delivered while delivering the development requirements of the site. For example, can hedgerows be retained or will they need to be bisected by access roads etc.? If they cannot be delivered, it is not clear whether this invalidates the conclusions of the HRA.

The onsite mitigation policy says “Sensitive habitat features...include: ... These features should be retained...”. The policy thus only protects the listed sensitive features, but not any unlisted sensitive features. The HRA does not discuss whether this list of features covers the vast majority of features or otherwise quantified the proportion of features covered. It would give greater certainty to the HRA if it did.

We note that the onsite mitigation policy requires 10-16m of native landscaping. It is not clear why these figures were chosen, and why there is such a spread in width. We suggest this is reviewed and justified, to provide greater certainty in the conclusions of the HRA.”

In the same response they also determine:

“In terms of site allocation policies, we have concerns around whether the allocations are consistent with the NPPF in the context of impacts on rights of way and open space, given what we perceive as a lack of implementation of relevant NPPF and Core Strategy policies (NPPF paras 74



and 75 and CP51) on comparable sites. As such, without confirmation that a robust approach will be taken to implementing these policies, we advise that the plan is unsound." (My bold and italic)

The Environment agency has, in relation to this point, determined that a 20 metre environmental buffer be incorporated.

This independent determination and specialist advice removes the access to the site from either the North or East.

Access from the North, being through the residential property which the Council have pledged to respect in the plan as voted upon by Cabinet and Councillors, and through an important hedgerow protected in law and through a required environmental buffer (whatever the depth) is therefore neither practical or legal. This would also require acquiescence from The Town and Parish Councils who publicly oppose the site along with a separate license from the Environment Agency due to the notified flood plain and the associated drainage system.

Access from the East, the A361, would also require cutting through hedgerow protected by the HRA assessment, Natural England requirements and disregarding the Heritage Impact Assessment. In addition a bridge/culvert would need to be constructed to protect not only the Heritage Asset as listed, but to ensure the lifetime surety from flooding as required by the NPPF sequential test.

The site is presented as being of marginal sustainability and fails many of the tests set up for sustainability criteria, most notably access to infrastructure and transport links (a sporadic and limited bus service and distances of over 2km to both the centre of town and any rail service). Serious concerns have been raised in the HIA report and breaches of both law and regulation would have to be made.

#### Conclusion

Since the site was first put forward for consultation in the June 2017 Draft Housing Allocation Proposal many arguments based in fact have emerged mitigating against its sustainability. These take the form of legal proscriptions such as the 1997 Hedgerows Act and the Planning (Listed Buildings and Conservation Areas) Act 1990, direction from National bodies such as Natural England and the Environment Agency, procedural direction from the NPPF and from reports commissioned by Wiltshire Council at great cost to the public purse.

This emerging evidence argues strongly that, had it been in the hands of Council Officers during the writing of the Draft, the site would have been deemed unsustainable and unsuited to development. The process in which we are all engaged is designed to seek the truth and to give weight to all evidence, irrespective of its source, but judged only on its validity.

This presentation is referenced, logical and factual. It refers to a single site in a County wide process and must have occupied a proportionately small amount of assessment at its inclusion but which means immeasurably more to those who use and value it beyond its monetary value. It can only be hoped that, with the presentation of this interwoven evidence a true picture of the site as current recreational space, wildlife haven, functional flood plain and nationally important landscape it can be safeguarded.

The descriptors in the above paragraph are those of agencies and Officers from whose hard work the argument above is developed and presented.

Thank you for taking the time to consider and assess the above points. If at any point you feel that a visit to the site would be advantageous I would be happy to act as your guide.

Bibliography

- Wiltshire Housing Site Allocations Plan

Sustainability Appraisal Report

Annex 1 A.9 Trowbridge Principal Settlement

Wiltshire Council

May 2018

- Wiltshire Housing Site Allocations Plan

Heritage impact assessment

Final Report Prepared by LUC March 2018

<http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Submission%20July%202018/The%20Plan%20%26%20Supporting%20Documents&fileref=6>

- The 1997 Hedgerow act

<https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>

- 1793 Andrews and Durys map of Wiltshire

Wiltshire & Swindon History Centre, Chippenham

[http://www.wiltshirerecordsociety.org.uk/map/wrs\\_v08\\_index\\_map.jpg](http://www.wiltshirerecordsociety.org.uk/map/wrs_v08_index_map.jpg)

- CASE OFFICER'S REPORT

15/04570/FUL

<https://unidoc.wiltshire.gov.uk/UniDoc/Document/Search/DSA,851321>

<https://unidoc.wiltshire.gov.uk/UniDoc/Document/File/MTUvMDQ1NzAvRlVMDY0NDcwNQ==>

- Wiltshire Housing Site Allocations Plan Pre-submission draft plan

Habitat Regulations assessment (HRA)

	<p>June 2017</p> <p>WHSAs%2520PSCONS10%2520Habitat%2520Regulations%2520Assessment%2520June%25202017[3917][3859].pdf</p> <ul style="list-style-type: none"> <li>• Letters and emails from and to The Environment Agency, Natural England and the County Planning Archaeologist can be presented in full if required.</li> </ul>		
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5152504		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	462	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Sustainability Appraisal (September 2018) or Update to the Habitat Regulations Assessment Addendum	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>	Update to Habitats Regulations Assessment Addendum (September 2018) (EXAM/03)				
<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation</b>	Referenced objections to site 3565 Introduction All information presented below is believed to be factual. All references made are listed in the body of the text and where possible are included in a bibliography complete with hyperlinks. Sources referenced are from Wiltshire County Policy, WCC Commissioned consultants reports, Natural				

**Assessment Addendum  
(September 2018).**

England, The Environment Agency, Wiltshire County Officers Reports, DEFRA, Wiltshire County Planning Archaeologist and currently applicable NPPF direction.

Argument

Site 3565 is unsuitable for development and unsustainable

Description

Site 3565 (Fields adjacent to Southwick Court) lies mostly in the Parish of Southwick, and partly in the Parish of North Bradley, just outside of the County Town of Trowbridge (Grid Ref ST 84776 55992). On the Northern side of the site lies a stream and brook network which is defined by a hedgerow dating to at least 1795. The hedgerow is protected by the 1997 Hedgerows act under several set criteria as an Important hedgerow. A majority of this hedgerow is also protected by tree protection orders and contains a brook which intersects with the Lambrok Stream. The Northern side of this hedgerow lies within the town of Trowbridge, the Southern within the Parish of Southwick. As the Sustainability Appraisal states:

“The land serves to separate Trowbridge from the village of Southwick. As such, development would potentially threaten the separate identity of Southwick and intrinsic quality of the countryside.”

Which runs contrary to Core Policy 29 and should immediately render the site invalid.

To the immediate North of this protected hedgerow lies a variety of developments, the majority dating back to the 1970's with some as recently constructed as the late 1990's. These consist of a variety of building styles but are well screened from both the rolling landscape and the protected Heritage assets beyond. Without exception they are constructed within the boundary of the town of Trowbridge. The current built form has been protected within the Housing Site allocation document in which it pledges to respect the current form. This takes the shape of a number of cul-de-sac's which define the town boundary with the proposed site.

The proposed site is bisected on a North-South line by the protected Lambrok Stream. This divides the site into two portions, the westernmost third which is directly adjacent to the A361 and the easternmost two thirds. The stream feeds directly into the stream and brook running along the hedgerow and is bounded by significant level two and three flood plains. This is exacerbated by a drop-off of approximately three metres from the Southern extreme of the proposed site to the Northern boundary demarcated by the Hedgerow and stream.

The Lambrok stream floods on a regular basis which then impacts on the brook and stream feature running along the Parish boundary. The system takes surface water runoff from several hundred yards away from the properties to the North of Silver Street Lane some hundred and fifty metres upslope to the North. This flooding directly impacts on the entire North-South axis of the site and affects the entirety of the drop-off. A consequence of this flooding is to force both surface water and untreated sewage out of the drains in the nearby housing developments.

The immediate South of the site is bounded by the Lambrok Stream and is also classified as being predominantly level two and three flood plain. The majority of the land between these areas of notified flood plain is classified as suffering from build-up of excessive surface water.

To the South West of the site lie the two registered Heritage Assets of Southwick Court and it's separately listed moat. These are informed and contextualised by the site itself which contains earthworks associated with the Assets from the post-medieval period. The moat feature is fed and

supported by the managed and developed geology and fieldworks which are a part of the Lambrok stream. Independent consultants have recognised the interdependency of these features and the reliance of the one on the other.

A field to the South-East of the proposed site has been noted to have damaged the context of the Listed Assets with the construction of a solar farm. Whilst this is not visible from the Assets, it has impacted on the managed landscape and associated ancillary buildings related to the Assets. The proposed development is directly adjacent to the Assets themselves.

To the immediate South-East lie Bramble Farm. This land is currently used for cattle farming as is the site itself which is worked on a tenancy basis. Access to Bramble Farm is by a part shingled and part earthen trackway known as Axe and Cleaver Lane.

The proposed site itself is currently used for a mix of the aforementioned cattle farming, informal recreation and leisure, and houses a number of public footpaths. The footpaths lead to the nearby villages of Southwick and North Bradley and on to the villages of Wingfield and Hoggington. Current OS maps include three footpaths, but DMMO procedures are currently in place for two others with documentary evidence showing their unrestricted use for thirty years.

Use of the site for dwellings will therefore increase flooding suffered by current dwelling invalidating the Environment Agency requirement for 'lifetime certainty' of freedom from flooding and fail NPPF sequential testing. The use of the site will irreparably damage Heritage assets, described by consultants as:

"Nationally important"

(Wiltshire Housing Sites Allocations Plan: Historic impact assessment 7.15)

Finally, access to the site will either involve cutting through a level three flood plain and protected hedgerow.

Or

Cutting through Important Hedgerow protected by the 1997 Hedgrows Act and invalidating the terms of the proposed plan as voted into being by Cabinet and Councillors.

Or

Cutting a road from Southwick village across landscape integral to listed Heritage Assets.

Or

Enacting a Compulsory Purchase Order to develop Axe and Cleaver Lane to make it fit for vehicular traffic.

Legislative, Factual and Policy issues

Legislative

The 1997 Hedgerow act specifically forbids the permanent destruction or removal of an 'Important' hedgerow. A link provided by DEFRA is here:  
<https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>

The hedgerow running to the immediate North of the site, forming the boundary between Trowbridge and Southwick is show on the 1793 Andrews and Durys map of Wiltshire and can be found in the Wiltshire & Swindon History Centre, Chippenham. A link to this map appears in the bibliography and a detail is reproduced below:

[See attachement for map]

This unequivocally dates the boundary and is sufficient, along with other set criteria such as the presence of a watercourse, footpath and broad leafed species, to meet the criteria.

Despite permission granted in advance of any application by the County arboricultural Officer to cut through this hedgerow:

“There has been a site meeting with various interested parties who have expressed a clear desire not to remove any trees or any parts of the existing hedge other than one small section to make way for an emergency access route with lockable bollards on both sides of the proposed route. They will include this within a tree survey and recommendations and should the development gain consent, they would be permitted to remove the small, 7m section of hedge.”

This hedgerow is protected under legislation. No order needs to me made to confer this status in law, just the meeting of the criteria.

- It marks a pre-1850 parish or township boundary (criterion a)
- It incorporates an archaeological feature (post medieval earthworks) as noted in the Proposal and confirmed by the Planning Archaeologist (email in appendix C) (criterion 2/3).
- The hedgerow is associated with a pre-1600 estate or manor (criterion 4)
- Contains certain categories of species of bird, animals or plants listed in the Wildlife and Countryside Act or Joint Nature Conservation Committee (JNCC) publications.
- Runs alongside a bridleway, footpath, road used as a public path, or a byway open to all traffic and includes at least 4 woody species, on average, in a 30m length and has at least 2 of the associated features listed at (i) or (v) below. The associated features are:
  - i. A bank or wall supporting the hedgerow.
  - ii. Less than 10% gaps.
  - iii. On average, at least one tree per 50m.
  - iv. At least 3 species from a list of 57 woodland plants.

v. v.A ditch.

vi. A number of connections with other hedgerows, ponds or woodland.

vii. A parallel hedge within 15m.

The act states that the hedgerow cannot be removed and can only be temporarily broken through if the work is for defence of the realm or for public safety reasons and only if there is no other access. If a breakthrough has to occur it must be no wider than 20 metres and replaced as soon as the work is complete.

Furthermore it is clearly stated that:

“ The presumption is in favour of protecting and retaining important hedgerows” (The hedgerow regulations 1997 1.7)

“the removal(1) of a hedgerow to which these Regulations apply is prohibited” (The hedgerow regulations 1997 5.0)

This removes access from the town of Trowbridge.

Paragraph 170 of the current NPPF regulations states that:

A functional floodplain is a very important planning tool in making space for flood waters when flooding occurs. Generally, development should be directed away from these areas using the Environment Agency’s catchment flood management plans, shoreline management plans and local flood risk management strategies produced by lead local flood authorities.

The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. Areas which would naturally flood, but which are prevented from doing so by existing defences and infrastructure or solid buildings, will not normally be identified as functional floodplain. If an area is intended to flood, eg an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often.

Paragraph: 015 Reference ID: 7-015-20140306

This photograph illustrates the nature of the functional flood plain as shown in the Environment Agency “South Court Farm” map. The photograph was taken on the upper portion of the flood plain itself.

[See attachement for photograph]

The building in the background being Southwick Court Farm and the wooden structure in the middle ground the corral indicated on the same photograph. This is at the high point of a drop off of approximately two metres to the hedge junction at the bottom left of the photo (Northern fringe of the site).

This photograph was taken from approximately this point on the satellite image:



[See attachment for map]

This is the Environment Agency Flood plain assessment (two footpaths appearing on OS maps are absent from this map but run from the current built form, these are not currently disputed or subject to DMMO Process):

[See attachment for map]

Current flood events have had this impact in nearby properties:

Policy

Wiltshire Policy CR1, contained within the January 2009 Leisure and Recreation Development Plan Document states that:

“The public rights of way network will be protected from development for other land uses and extensions and improvements will be sought, where appropriate, as part of development proposals.”

This recognition goes further and an Officer report relating to the Solar Farm constructed in another section of the Southwick Court estate reads:

“The Planning (Listed Buildings and Conservation Areas) Act 1990 to give special regard to the “desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” (S16 and 66). Paragraph 132 of the NPPF states that “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. ... Significance can be harmed or lost through ... development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.” Core Policy 58 of the Wiltshire Core Strategy echoes the above national policy in seeking the protection, conservation and, where possible, enhancement of listed buildings.”

As will be illustrated this policy is not upheld when the HIA report is considered.

The proposed site contains three notified footpaths as set out in OS maps and a further two-long standing trackways are the subject of DMMO applications at this time. When Natural England comments made to Wiltshire Council in their response to the Housing Allocation Proposal are taken into consideration:

“We note that a high proportion of the proposed sites are land which is either bisected or bounded by public rights of way or is used for recreational purposes as open space. Development of these sites is likely to detrimentally affect the recreational value of these features. (C.f. NPPF paras 74. Existing open space...should not be built on unless... and 75. Planning policies should protect and enhance public rights of way and access.). We note that the Wiltshire Core Strategy says (CP51 – green infrastructure)

“If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required. Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.”

We are unaware of any such audits being undertaken since the Core Strategy was adopted, and our impression is that, compensatory provision has rarely, if ever, been made.”

This demonstrates the determination of an independent body in the assessment of the aspect of the site which is relevant here.

The Sustainability Assessment defines the site as being used for informal recreation. A survey delivered average daily usage as being between 100 and 120 individuals. Furthermore Natural England responded to Wiltshire Council by stating that:

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In an attempt to present the significance of this document to the argument I reproduce a number of direct quotations here:

7.16 Setting makes a critical contribution to the significance of both assets, relating in the first instance to their immediate setting within the earlier – intact and functional – moated enclosure. The relationship to the later farm buildings outside the moat adds to the historical value in supplying the most recent agricultural chapter in the narrative of a site continuously occupied for around 600 years. The relationship to the wider landscape also contributes to the significance of the assets.

7.17 Similarly, the relationship of the asset group to the wider agricultural hinterland is important, as currently it stands in ‘splendid isolation’ as the one prominent feature – delineated in part by the trees following the moat boundary – in a sizeable tract of open agricultural landscape. The asset and its wider setting should therefore be considered to be an archaeological landscape of considerable importance. For example, the open space around the asset allows a clear understanding of the hierarchy of the 16th/17th century farmsteads in the immediate vicinity.

7.18 A Functional and historical connection with this agricultural landscape can therefore be established which elevates its importance in terms of contribution to these values and the assets’ setting.

7.20 The designated assets are of high importance, reflecting their national significance. The moat itself should be viewed as being indivisible from the significance of the designated features and, in its own right, likely to be of equivalent significance to a Scheduled Monument<sup>18</sup>.

7.23 Change in the wider landscape of the proposed site is likely to have two main effects. Firstly, it has the potential to sever the functional and historical links between the moated site and particularly the farmhouse with the contemporary water meadows that were likely integral to the 16th century enhancement of the place, and with the later enclosure landscape that forms its agricultural hinterland. Secondly, development has the potential to change the ability to appreciate the assets’ relatively prominent position in the local landscape. It stands on a small area of slightly elevated ground, in ‘splendid isolation’ from the surrounding historic villages – reflecting its origins as an isolated farm centre.

#### Risk of harm

7.24 Development of the entire proposed allocation would completely sever the assets from their landscape and economic/historical context. This would result in harm to the significance of the asset. Similarly, development would be likely to reduce the legibility of the asset as an isolated manorial farm, and change its prominence in the local landscape. The historical landholdings of the assets have already been harmed by development, particularly the large-scale intrusion created by the nearby solar farm.

7.25 While the core of the assets' relationships and setting – i.e. between the individual built elements and the archaeological heritage – would remain intact, the potential extent of losses of demonstrably functionally, historically and visually connected landscape comprising the wider setting of the asset represents a major impact. This would likely approach substantial harm, given the cumulative effect of interacting layers of asset's significance in forming a large-scale and relatively intact historic landscape.

7.26 Taking a precautionary approach, this is considered to be a high effect for the purposes of this assessment.

7.27 The same assertions hold for the non-designated elements of the place.

#### Options for sustainable development

7.28 Development anywhere within the proposed allocation area will result in loss of functional and historical relationships between the asset and the area of water meadow or enclosures affected.

Mitigation by design is not considered to be a realistic option if delivery of significant numbers of houses on site is required. While a small number of units could be accommodated in the extreme eastern extent of the site, this would need to be very carefully designed to 'sit down' into the landscape – but the comparatively flat site and open landscape does not lend itself to this type of intervention.

#### Cumulative effects

7.34 When considered in combination with other proposed allocations (H2.2 and H2.4) H2.6 could result in significant urbanisation of the southern edge of Trowbridge. This would substantially reduce the current separation between the historic settlements of Southwick and North Bradley from suburban Trowbridge, in addition to eroding the significant and legible historic character of the landscape.

The final summative comment is:

#### Options for sustainable development

7.36 As indicated above, archaeological investigation to understand the extent, date and significance of in situ remains would be required; the results should inform an appropriate mitigation strategy in support of any planning application. This would be secured by condition.

7.37 Mitigation by design is not considered to be a realistic option if delivery of significant numbers of houses on site is required. Insertion of a small area of development in the eastern extremity of the site could potentially avoid the majority of effects, but may not be either viable or feasible on other grounds.

(My highlights throughout) [See attachment for highlights]

The conclusion is accompanied by this map, red being land to remain untouched:

[See attachment for map]

And the interpretation of this conclusion as presented to Cabinet and Council to inform their vote was presented as:

“In fact, the assessment concludes that less than substantial harm would likely result, albeit at a perceived higher end of the less than substantial harm scale.”

To paraphrase this interpretation:

“In actual fact the wording used to interpret a clear directive is speculative, misleading and does not appear in any conclusion in the independent report and the site has been adjudged to be at high risk and totally unsuited to any significant development”

In the HRA assessment of the site commissioned by Wiltshire Council a determination of the site determined that due to its ecologically and environmentally sensitive nature the Lambrook stream and associated drainage features must be:

“Protected and/or buffered”

This is in partial recognition of its significance as a natural corridor for wildlife, relied upon by some endangered species such as water voles and Bechstein bats and partially as recognition of the ongoing practical function as a flood plain.

National body comment

In response to the HRA document Natural England responded to Wiltshire Council with this determination:

“A range of onsite mitigation measures are proposed. However, it is not clear that these measures can be delivered while delivering the development requirements of the site. For example, can hedgerows be retained or will they need to be bisected by access roads etc.? If they cannot be delivered, it is not clear whether this invalidates the conclusions of the HRA.

The onsite mitigation policy says “Sensitive habitat features...include: ... These features should be retained...”. The policy thus only protects the listed sensitive features, but not any unlisted sensitive features. The HRA does not discuss whether this list of features covers the vast majority of features or otherwise quantified the proportion of features covered. It would give greater certainty to the HRA if it did.

We note that the onsite mitigation policy requires 10-16m of native landscaping. It is not clear why these figures were chosen, and why there is such a spread in width. We suggest this is reviewed and justified, to provide greater certainty in the conclusions of the HRA.”

In the same response they also determine:

“In terms of site allocation policies, we have concerns around whether the allocations are consistent with the NPPF in the context of impacts on rights of way and open space, given what we perceive as a lack of implementation of relevant NPPF and Core Strategy policies (NPPF paras 74

and 75 and CP51) on comparable sites. As such, without confirmation that a robust approach will be taken to implementing these policies, we advise that the plan is unsound." (My bold and italic)

The Environment agency has, in relation to this point, determined that a 20 metre environmental buffer be incorporated.

This independent determination and specialist advice removes the access to the site from either the North or East.

Access from the North, being through the residential property which the Council have pledged to respect in the plan as voted upon by Cabinet and Councillors, and through an important hedgerow protected in law and through a required environmental buffer (whatever the depth) is therefore neither practical or legal. This would also require acquiescence from The Town and Parish Councils who publicly oppose the site along with a separate license from the Environment Agency due to the notified flood plain and the associated drainage system.

Access from the East, the A361, would also require cutting through hedgerow protected by the HRA assessment, Natural England requirements and disregarding the Heritage Impact Assessment. In addition a bridge/culvert would need to be constructed to protect not only the Heritage Asset as listed, but to ensure the lifetime surety from flooding as required by the NPPF sequential test.

The site is presented as being of marginal sustainability and fails many of the tests set up for sustainability criteria, most notably access to infrastructure and transport links (a sporadic and limited bus service and distances of over 2km to both the centre of town and any rail service). Serious concerns have been raised in the HIA report and breaches of both law and regulation would have to be made.

#### Conclusion

Since the site was first put forward for consultation in the June 2017 Draft Housing Allocation Proposal many arguments based in fact have emerged mitigating against its sustainability. These take the form of legal proscriptions such as the 1997 Hedgerows Act and the Planning (Listed Buildings and Conservation Areas) Act 1990, direction from National bodies such as Natural England and the Environment Agency, procedural direction from the NPPF and from reports commissioned by Wiltshire Council at great cost to the public purse.

This emerging evidence argues strongly that, had it been in the hands of Council Officers during the writing of the Draft, the site would have been deemed unsustainable and unsuited to development. The process in which we are all engaged is designed to seek the truth and to give weight to all evidence, irrespective of its source, but judged only on its validity.

This presentation is referenced, logical and factual. It refers to a single site in a County wide process and must have occupied a proportionately small amount of assessment at its inclusion but which means immeasurably more to those who use and value it beyond its monetary value. It can only be hoped that, with the presentation of this interwoven evidence a true picture of the site as current recreational space, wildlife haven, functional flood plain and nationally important landscape it can be safeguarded.

The descriptors in the above paragraph are those of agencies and Officers from whose hard work the argument above is developed and presented.

Thank you for taking the time to consider and assess the above points. If at any point you feel that a visit to the site would be advantageous I would be happy to act as your guide.

Bibliography

- Wiltshire Housing Site Allocations Plan

Sustainability Appraisal Report

Annex 1 A.9 Trowbridge Principal Settlement

Wiltshire Council

May 2018

- Wiltshire Housing Site Allocations Plan

Heritage impact assessment

Final Report Prepared by LUC March 2018

<http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Submission%20July%202018/The%20Plan%20%26%20Supporting%20Documents&fileref=6>

- The 1997 Hedgerow act

<https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>

- 1793 Andrews and Durys map of Wiltshire

Wiltshire & Swindon History Centre, Chippenham

[http://www.wiltshirerecordsociety.org.uk/map/wrs\\_v08\\_index\\_map.jpg](http://www.wiltshirerecordsociety.org.uk/map/wrs_v08_index_map.jpg)

- CASE OFFICER'S REPORT

15/04570/FUL

<https://unidoc.wiltshire.gov.uk/UniDoc/Document/Search/DSA,851321>

<https://unidoc.wiltshire.gov.uk/UniDoc/Document/File/MTUvMDQ1NzAvRlVMDY0NDcwNQ==>

- Wiltshire Housing Site Allocations Plan Pre-submission draft plan

Habitat Regulations assessment (HRA)

	<p>June 2017</p> <p>WWSA%2520PSCONS10%2520Habitat%2520Regulations%2520Assessment%2520June%25202017[3917][3859].pdf</p> <ul style="list-style-type: none"> <li>• Letters and emails from and to The Environment Agency, Natural England and the County Planning Archaeologist can be presented in full if required.</li> </ul>		
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5152504		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes



<b>Comment ID:</b>	463	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1126137	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a)				
<b>Please give details of why you support or do not support the updates to the</b>	Referenced objections to site 3565				

**associated evidence documents.**

Introduction

All information presented below is believed to be factual. All references made are listed in the body of the text and where possible are included in a bibliography complete with hyperlinks. Sources referenced are from Wiltshire County Policy, WCC Commissioned consultants reports, Natural England, The Environment Agency, Wiltshire County Officers Reports, DEFRA, Wiltshire County Planning Archaeologist and currently applicable NPPF direction.

Argument

Site 3565 is unsuitable for development and unsustainable

Description

Site 3565 (Fields adjacent to Southwick Court) lies mostly in the Parish of Southwick, and partly in the Parish of North Bradley, just outside of the County Town of Trowbridge (Grid Ref ST 84776 55992). On the Northern side of the site lies a stream and brook network which is defined by a hedgerow dating to at least 1795. The hedgerow is protected by the 1997 Hedgerows act under several set criteria as an Important hedgerow. A majority of this hedgerow is also protected by tree protection orders and contains a brook which intersects with the Lambrok Stream. The Northern side of this hedgerow lies within the town of Trowbridge, the Southern within the Parish of Southwick. As the Sustainability Appraisal states:

“The land serves to separate Trowbridge from the village of Southwick. As such, development would potentially threaten the separate identity of Southwick and intrinsic quality of the countryside.”

Which runs contrary to Core Policy 29 and should immediately render the site invalid.

To the immediate North of this protected hedgerow lies a variety of developments, the majority dating back to the 1970's with some as recently constructed as the late 1990's. These consist of a variety of building styles but are well screened from both the rolling landscape and the protected Heritage assets beyond. Without exception they are constructed within the boundary of the town of Trowbridge. The current built form has been protected within the Housing Site allocation document in which it pledges to respect the current form. This takes the shape of a number of cul-de-sac's which define the town boundary with the proposed site.

The proposed site is bisected on a North-South line by the protected Lambrok Stream. This divides the site into two portions, the westernmost third which is directly adjacent to the A361 and the easternmost two thirds. The stream feeds directly into the stream and brook running along the

hedgerow and is bounded by significant level two and three flood plains. This is exacerbated by a drop-off of approximately three metres from the Southern extreme of the proposed site to the Northern boundary demarcated by the Hedgerow and stream.

The Lambrok stream floods on a regular basis which then impacts on the brook and stream feature running along the Parish boundary. The system takes surface water runoff from several hundred yards away from the properties to the North of Silver Street Lane some hundred and fifty metres upslope to the North. This flooding directly impacts on the entire North-South axis of the site and affects the entirety of the drop-off. A consequence of this flooding is to force both surface water and untreated sewage out of the drains in the nearby housing developments.

The immediate South of the site is bounded by the Lambrok Stream and is also classified as being predominantly level two and three flood plain. The majority of the land between these areas of notified flood plain is classified as suffering from build-up of excessive surface water.

To the South West of the site lie the two registered Heritage Assets of Southwick Court and its separately listed moat. These are informed and contextualised by the site itself which contains earthworks associated with the Assets from the post-medieval period. The moat feature is fed and supported by the managed and developed geology and fieldworks which are a part of the Lambrok stream. Independent consultants have recognised the interdependency of these features and the reliance of the one on the other.

A field to the South-East of the proposed site has been noted to have damaged the context of the Listed Assets with the construction of a solar farm. Whilst this is not visible from the Assets, it has impacted on the managed landscape and associated ancillary buildings related to the Assets. The proposed development is directly adjacent to the Assets themselves.

To the immediate South-East lie Bramble Farm. This land is currently used for cattle farming as is the site itself which is worked on a tenancy basis. Access to Bramble Farm is by a part shingled and part earthen trackway known as Axe and Cleaver Lane.

The proposed site itself is currently used for a mix of the aforementioned cattle farming, informal recreation and leisure, and houses a number of public footpaths. The footpaths lead to the nearby villages of Southwick and North Bradley and on to the villages of Wingfield and Hoggington. Current OS maps include three footpaths, but DMMO procedures are currently in place for two others with documentary evidence showing their unrestricted use for thirty years.

Use of the site for dwellings will therefore increase flooding suffered by current dwelling invalidating the Environment Agency requirement for 'lifetime certainty' of freedom from flooding and fail NPPF sequential testing. The use of the site will irreparably damage Heritage assets, described by consultants as:

"Nationally important"

(Wiltshire Housing Sites Allocations Plan: Historic impact assessment 7.15)

Finally, access to the site will either involve cutting through a level three flood plain and protected hedgerow.

Or

Cutting through Important Hedgerow protected by the 1997 Hedgrows Act and invalidating the terms of the proposed plan as voted into being by Cabinet and Councillors.

Or

Cutting a road from Southwick village across landscape integral to listed Heritage Assets.

Or

Enacting a Compulsory Purchase Order to develop Axe and Cleaver Lane to make it fit for vehicular traffic.

Legislative, Factual and Policy issues

Legislative

The 1997 Hedgerow act specifically forbids the permanent destruction or removal of an 'Important' hedgerow. A link provided by DEFRA is here:

<https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>

The hedgerow running to the immediate North of the site, forming the boundary between Trowbridge and Southwick is show on the 1793 Andrews and Durys map of Wiltshire and can be found in the Wiltshire & Swindon History Centre, Chippenham. A link to this map appears in the bibliography and a detail is reproduced below:

[See attachement for map]

This unequivocally dates the boundary and is sufficient, along with other set criteria such as the presence of a watercourse, footpath and broad leafed species, to meet the criteria.

Despite permission granted in advance of any application by the County arboricultural Officer to cut through this hedgerow:

“There has been a site meeting with various interested parties who have expressed a clear desire not to remove any trees or any parts of the existing hedge other than one small section to make way for an emergency access route with lockable bollards on both sides of the proposed route. They will include this within a tree survey and recommendations and should the development gain consent, they would be permitted to remove the small, 7m section of hedge.”

This hedgerow is protected under legislation. No order needs to be made to confer this status in law, just the meeting of the criteria.

- It marks a pre-1850 parish or township boundary (criterion a)
- It incorporates an archaeological feature (post medieval earthworks) as noted in the Proposal and confirmed by the Planning Archaeologist (email in appendix C) (criterion 2/3).
- The hedgerow is associated with a pre-1600 estate or manor (criterion 4)
- Contains certain categories of species of bird, animals or plants listed in the Wildlife and Countryside Act or Joint Nature Conservation Committee (JNCC) publications.
- Runs alongside a bridleway, footpath, road used as a public path, or a byway open to all traffic and includes at least 4 woody species, on average, in a 30m length and has at least 2 of the associated features listed at (i) or (v) below. The associated features are:
  - i. A bank or wall supporting the hedgerow.
  - ii. Less than 10% gaps.
  - iii. On average, at least one tree per 50m.
  - iv. At least 3 species from a list of 57 woodland plants.
  - v. A ditch.
  - vi. A number of connections with other hedgerows, ponds or woodland.
  - vii. A parallel hedge within 15m.

The act states that the hedgerow cannot be removed and can only be temporarily broken through if the work is for defence of the realm or for public safety reasons and only if there is no other access. If a breakthrough has to occur it must be no wider than 20 metres and replaced as soon as the work is complete.

Furthermore it is clearly stated that:

“ The presumption is in favour of protecting and retaining important hedgerows” (The hedgerow regulations 1997 1.7)

“the removal(1) of a hedgerow to which these Regulations apply is prohibited” (The hedgerow regulations 1997 5.0)

This removes access from the town of Trowbridge.

Paragraph 170 of the current NPPF regulations states that:

A functional floodplain is a very important planning tool in making space for flood waters when flooding occurs. Generally, development should be directed away from these areas using the Environment Agency’s catchment flood management plans, shoreline management plans and local flood risk management strategies produced by lead local flood authorities.

The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. Areas which would naturally flood, but which are prevented from doing so by existing defences and infrastructure or solid buildings, will not normally be identified as functional floodplain. If an area is intended to flood, eg an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often.

Paragraph: 015 Reference ID: 7-015-20140306

This photograph illustrates the nature of the functional flood plain as shown in the Environment Agency “South Court Farm” map. The photograph was taken on the upper portion of the flood plain itself.

[See attachment for photograph]

The building in the background being Southwick Court Farm and the wooden structure in the middle ground the corral indicated on the same photograph. This is at the high point of a drop off of approximately two metres to the hedge junction at the bottom left of the photo (Northern fringe of the site).

This photograph was taken from approximately this point on the satellite image:

[See attachement for map]

This is the Environment Agency Flood plain assessment (two footpaths appearing on OS maps are absent from this map but run from the current built form, these are not currently disputed or subject to DMMO Process):

[See attachment for map]

Current flood events have had this impact in nearby properties:

Policy

Wiltshire Policy CR1, contained within the January 2009 Leisure and Recreation Development Plan Document states that:

“The public rights of way network will be protected from development for other land uses and extensions and improvements will be sought, where appropriate, as part of development proposals.”

This recognition goes further and an Officer report relating to the Solar Farm constructed in another section of the Southwick Court estate reads:

“The Planning (Listed Buildings and Conservation Areas) Act 1990 to give special regard to the “desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” (S16 and 66). Paragraph 132 of the NPPF states that “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. ... Significance can be harmed or lost through ... development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.” Core Policy 58 of the Wiltshire Core Strategy echoes the above national policy in seeking the protection, conservation and, where possible, enhancement of listed buildings.”

As will be illustrated this policy is not upheld when the HIA report is considered.

The proposed site contains three notified footpaths as set out in OS maps and a further two-long standing trackways are the subject of DMMO applications at this time. When Natural England comments made to Wiltshire Council in their response to the Housing Allocation Proposal are taken into consideration:

“We note that a high proportion of the proposed sites are land which is either bisected or bounded by public rights of way or is used for recreational purposes as open space. Development of these sites is likely to detrimentally affect the recreational value of these features. (C.f. NPPF paras 74. Existing open space...should not be built on unless... and 75. Planning policies should protect and enhance public rights of way and access.). We note that the Wiltshire Core Strategy says (CP51 – green infrastructure)

“If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required. Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.”

We are unaware of any such audits being undertaken since the Core Strategy was adopted, and our impression is that, compensatory provision has rarely, if ever, been made.”

This demonstrates the determination of an independent body in the assessment of the aspect of the site which is relevant here.

The Sustainability Assessment defines the site as being used for informal recreation. A survey delivered average daily usage as being between 100 and 120 individuals. Furthermore Natural England responded to Wiltshire Council by stating that:

“It is not clear how public rights of way and valued open space has been considered in the Sustainability Appraisal. While they feature under objective 7, (will the policy protect rights of way, open space and common land?), a word search shows that right/rights of way is only mentioned 3 times in the site assessments, while existing open space is mentioned only twice.”

In its own assessment of the site Wiltshire Council describe the site in the following words:

“This is recreational or amenity space at the edge of a settlement that relates more closely to the built environment.

Core Policy 29 and the supporting text (paragraph 5.150) of the WCS identify specific issues to be addressed in planning for the Trowbridge Community Area, including:



“It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities.”

“All development in Trowbridge should be sensitive to constraints, such as the local County Wildlife Sites, SSSIs, Ancient Woodland, the Western Wiltshire Greenbelt and areas at risk of flooding”

This site is within Southwick, but abutting Trowbridge thereby removing that separation entirely and both contains, and is bounded by, areas not only at risk of flooding, but which currently flood on a regular basis.

Independent adjudication

WCC commissioned reports

The Sustainability assessment commissioned by Wiltshire Council (Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report, Annex 1, A.9 Trowbridge Principal Settlement) is confusing and as a document presented to both Cabinet and Council for two discrete votes talks of housing density of both 280 and 237 dwellings. The Housing Allocation Proposal suggests 180 as the density for this site. Despite this the site is continually referred to as being on the North of the town. The inference being that the site is within the boundary of the Town and not the village.

Paragraph 157 of the current NPPF states that:

Crucially, Local Plans should:

“Identify land where development would be inappropriate, for instance because of its environmental or historic significance”

The County Planning Archaeologist has reported in June 2017 that:

“I have previously provided screening opinion advice for this site to the planning team. I highlighted that The Wiltshire and Swindon Historic Environment Record shows that a number of features have been plotted within the proposed development site which relate to a post-medieval water meadow system. Southwick Court Farm lies immediately south of the proposed development site and contains a number of important heritage assets including a medieval moated site with a medieval farmstead of which the farmhouse is a Grade II\* Listed Building (national ref. 1194818) dating from 1567 to 1599. I therefore raised the need to have a full assessment of the impacts on the heritage assets in particular on the water meadows and Grade II\* Listed Building.

Without further assessment I cannot advise on the appropriateness of the development but I would say that putting 180 houses will have an impact on a number of heritage assets.”

The Sustainability Assessment advises strongly that an independent Heritage Impact Assessment be made of the site. At the time of presentation of the Sustainability Assessment such a report had been made and presented. The section pertaining to this site runs for seven pages including a map and I have taken the liberty of adding a link in the bibliography to this document in which seven pages relate to this site.

In an attempt to present the significance of this document to the argument I reproduce a number of direct quotations here:

7.16 Setting makes a critical contribution to the significance of both assets, relating in the first instance to their immediate setting within the earlier – intact and functional – moated enclosure. The relationship to the later farm buildings outside the moat adds to the historical value in supplying the most recent agricultural chapter in the narrative of a site continuously occupied for around 600 years. The relationship to the wider landscape also contributes to the significance of the assets.

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an isolated manorial farm, and change its prominence in the local landscape. The historical landholdings of the assets have already been harmed by development, particularly the large-scale intrusion created by the nearby solar farm.

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The final summative comment is:

#### Options for sustainable development

7.36 As indicated above, archaeological investigation to understand the extent, date and significance of in situ remains would be required; the results should inform an appropriate mitigation strategy in support of any planning application. This would be secured by condition.

7.37 Mitigation by design is not considered to be a realistic option if delivery of significant numbers of houses on site is required. Insertion of a small area of development in the eastern extremity of the site could potentially avoid the majority of effects, but may not be either viable or feasible on other grounds.

(My highlights throughout) [See attachment for highlights]

The conclusion is accompanied by this map, red being land to remain untouched:

[See attachment for map]

And the interpretation of this conclusion as presented to Cabinet and Council to inform their vote was presented as:

“In fact, the assessment concludes that less than substantial harm would likely result, albeit at a perceived higher end of the less than substantial harm scale.”

To paraphrase this interpretation:

“In actual fact the wording used to interpret a clear directive is speculative, misleading and does not appear in any conclusion in the independent report and the site has been adjudged to be at high risk and totally unsuited to any significant development”

In the HRA assessment of the site commissioned by Wiltshire Council a determination of the site determined that due to its ecologically and environmentally sensitive nature the Lambrook stream and associated drainage features must be:

“Protected and/or buffered”

This is in partial recognition of its significance as a natural corridor for wildlife, relied upon by some endangered species such as water voles and Bechstein bats and partially as recognition of the ongoing practical function as a flood plain.

National body comment

In response to the HRA document Natural England responded to Wiltshire Council with this determination:

“A range of onsite mitigation measures are proposed. However, it is not clear that these measures can be delivered while delivering the development requirements of the site. For example, can hedgerows be retained or will they need to be bisected by access roads etc.? If they cannot be delivered, it is not clear whether this invalidates the conclusions of the HRA.

The onsite mitigation policy says “Sensitive habitat features...include: ... These features should be retained...”. The policy thus only protects the listed sensitive features, but not any unlisted sensitive features. The HRA does not discuss whether this list of features covers the vast majority of features or otherwise quantified the proportion of features covered. It would give greater certainty to the HRA if it did.

We note that the onsite mitigation policy requires 10-16m of native landscaping. It is not clear why these figures were chosen, and why there is such a spread in width. We suggest this is reviewed and justified, to provide greater certainty in the conclusions of the HRA.”

In the same response they also determine:

“In terms of site allocation policies, we have concerns around whether the allocations are consistent with the NPPF in the context of impacts on rights of way and open space, given what we perceive as a lack of implementation of relevant NPPF and Core Strategy policies (NPPF paras 74 and 75 and CP51) on comparable sites. As such, without confirmation that a robust approach will be taken to implementing these policies, we advise that the plan is unsound.” (My bold and italic)

The Environment agency has, in relation to this point, determined that a 20 metre environmental buffer be incorporated.

This independent determination and specialist advice removes the access to the site from either the North or East.

Access from the North, being through the residential property which the Council have pledged to respect in the plan as voted upon by Cabinet and Councillors, and through an important hedgerow protected in law and through a required environmental buffer (whatever the depth) is therefore neither practical or legal. This would also require acquiescence from The Town and Parish Councils who publicly oppose the site along with a separate license from the Environment Agency due to the notified flood plain and the associated drainage system.

Access from the East, the A361, would also require cutting through hedgerow protected by the HRA assessment, Natural England requirements and disregarding the Heritage Impact Assessment. In addition a bridge/culvert would need to be constructed to protect not only the Heritage Asset as listed, but to ensure the lifetime surety from flooding as required by the NPPF sequential test.

The site is presented as being of marginal sustainability and fails many of the tests set up for sustainability criteria, most notably access to infrastructure and transport links (a sporadic and limited bus service and distances of over 2km to both the centre of town and any rail service). Serious concerns have been raised in the HIA report and breaches of both law and regulation would have to be made.

Conclusion

Since the site was first put forward for consultation in the June 2017 Draft Housing Allocation Proposal many arguments based in fact have emerged mitigating against its sustainability. These take the form of legal proscriptions such as the 1997 Hedgerows Act and the Planning

(Listed Buildings and Conservation Areas) Act 1990, direction from National bodies such as Natural England and the Environment Agency, procedural direction from the NPPF and from reports commissioned by Wiltshire Council at great cost to the public purse.

This emerging evidence argues strongly that, had it been in the hands of Council Officers during the writing of the Draft, the site would have been deemed unsustainable and unsuited to development. The process in which we are all engaged is designed to seek the truth and to give weight to all evidence, irrespective of its source, but judged only on its validity.

This presentation is referenced, logical and factual. It refers to a single site in a County wide process and must have occupied a proportionately small amount of assessment at its inclusion but which means immeasurably more to those who use and value it beyond its monetary value. It can only be hoped that, with the presentation of this interwoven evidence a true picture of the site as current recreational space, wildlife haven, functional flood plain and nationally important landscape it can be safeguarded.

The descriptors in the above paragraph are those of agencies and Officers from whose hard work the argument above is developed and presented.

Thank you for taking the time to consider and assess the above points. If at any point you feel that a visit to the site would be advantageous I would be happy to act as your guide.

#### Bibliography

- Wiltshire Housing Site Allocations Plan

Sustainability Appraisal Report

Annex 1 A.9 Trowbridge Principal Settlement

Wiltshire Council

May 2018

- Wiltshire Housing Site Allocations Plan

Heritage impact assessment

Final Report Prepared by LUC March 2018

<http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Submission%20July%202018/The%20Plan%20%26%20Supporting%20Documents&fileref=6>

- The 1997 Hedgerow act

<https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>

- 1793 Andrews and Durys map of Wiltshire

Wiltshire & Swindon History Centre, Chippenham

[http://www.wiltshirerecordsociety.org.uk/map/wrs\\_v08\\_index\\_map.jpg](http://www.wiltshirerecordsociety.org.uk/map/wrs_v08_index_map.jpg)

- CASE OFFICER'S REPORT

15/04570/FUL

<https://unidoc.wiltshire.gov.uk/UniDoc/Document/Search/DSA,851321>

<https://unidoc.wiltshire.gov.uk/UniDoc/Document/File/MTUvMDQ1NzAvRlVMLDY0NDcwNQ==>

- Wiltshire Housing Site Allocations Plan Pre-submission draft plan

Habitat Regulations assessment (HRA)

June 2017

[WWSA%2520PSCONS10%2520Habitat%2520Regulations%2520Assessment%2520June%25202017\[3917\]\[3859\].pdf](#)

- Letters and emails from and to The Environment Agency, Natural England and the County Planning Archaeologist can be presented in full if required

<b>Supporting documents (Please see Objective)</b>	5152504		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes



<b>Comment ID:</b>	464	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1132525	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Associated evidence documents		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				
<b>Please give details of why you support or do not support the updates to the</b>	<u>Regarding site 738 -14 houses on land adjacent to Dane's Lye</u>				

<p><b>associated evidence documents.</b></p>	<p>The planned size of development here is for 14 properties, which would give it a similar density to Rosenheim Rise, where I used to live. I have two concerns.</p> <p>Firstly, at this density, I hope that each property will be provided with two parking spaces to prevent parking on pavements and anti-social parking. This has become an increasing problem in Rosenheim Rise, and the other estate developments within the village.</p> <p>Secondly, I would be worried about the access to this site. There appears to be an access point from Castle Road to the land in question, but I suspect that developers wish for access directly onto the B3098. This latter option would be dangerous, as the junction would be on a non-linear approach to the village and visibility would be an issue. The safest access is definitely from Castle Road to the southeast corner of the land in question.</p>		
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	465	<b>Consultee</b> Chair Crudwell Neighbourhood Plan Steering Group	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1132949		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Re: Crudwell Parish Neighbourhood Plan Steering Group in support of the removal of Ridgeway Farm - Wiltshire Housing Site Allocation Proposed Change Reference Number PC92 Crudwell Neighbourhood Plan Steering Group fully supports the Councils decision to remove the Ridgeway Farm Site from the Wiltshire Housing Site Allocations Plan and would like to restate its comments on the original plan that decisions of this type are best made by local people at a local level with the support of the community. We submit our comments on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. Our Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for early December 2018 and Reg16 planned for Spring), and is planning to allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future. On that basis, we support the Proposed Change (PC92), which removes the Ridgeway Farm Site from the Wiltshire Housing Site Allocations Plan to allow the Crudwell Neighbourhood Plan to make the decision about growth in Crudwell Parish.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	466	<b>Consultee</b> Planner Persimmon Homes (Wessex)	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 983136		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC46				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] INTRODUCTION We write with reference to the above and welcome the opportunity to submit comments on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan. Please treat this as our formal representations, duly made within the consultation period. Building around 12,000 new homes a year in more than 400 locations nationwide, Persimmon is one of the UKs leading house builders, committed to the highest standards of planning, design and construction. Persimmon Homes is actively engaged with the delivery of various strategic and non-strategic mixed-use and residential schemes in Wiltshire and so is well placed to comment on the Plan. Persimmon Homes supports the preparation of the Wiltshire Site Allocations DPD as an opportunity to revise the out-of-date settlement boundaries and allocate new sites for housing to support the delivery of housing over the remainder of the Core Strategy plan period. However, Persimmon Homes maintains the concerns put forward in the previous comments on the draft Plan (representations dated 22 September 2017 consultee ID 983136). COMMENTS ON PROPOSED CHANGES PC1, PC5, PC7, PC8, PC11, PC18, PC18, PC38, PC45, PC46 MARKET LAVINGTON Persimmon Homes objects to proposed change PC46 which seeks to delete Housing Allocation H1.2 Underhill Nursery Market Lavington and the consequential changes to the Plan referenced as PC1, PC5, PC7, PC8, PC11, PC18, PC18, PC38 and PC45. The proposed change is not sound because it is not positively prepared or justified. The reason for the proposed change given in the Councils Schedule of Proposed Changes is: To reflect the resolution of Wiltshire Councils Cabinet, all sites at Market Lavington are proposed to be deleted from the WHSAP. The reason for this is that there is a comfortable five-year housing land supply position in the East HMA such that there is not a strategic need for sites to be allocated through the WHSAP at Market Lavington. Furthermore, significant progress has been made on the preparation of the Market Lavington Neighbourhood Plan, and given the strong five-year supply position in the East HMA, the Council can defer the consideration of potential housing allocations at Market Lavington to the emerging neighbourhood plan . The justification given for the change could therefore be summarised as: (i) because there is a five year land supply in the HMA; and (ii) because the Market Lavington Neighbourhood Plan can identify housing sites instead. With regard to the first reason, it is correct that the Council is currently able to demonstrate a five year land supply in the East Wiltshire HMA (indeed it is currently able to do this in each of the three HMAs). However this has not been used by the Council as justification for failing to identify sites in other Community Areas that have a substantial indicative remaining housing requirement to be identified. The Councils Devizes Community Area Topic Paper (July 2018) identifies that with the previously identified sites at Market Lavington removed (80 units) there is an indicative residual requirement for 81 dwellings still to be identified and delivered by 2026. Given that Market Lavington is identified in the Wiltshire Core Strategy as a Local Service Centre with a</p>			

good level of services and facilities (the highest order settlement in the Devizes Community Area remainder), it would be in line with the Councils overarching spatial strategy to deliver a high proportion of the outstanding need at Market Lavington, particularly given the lack of housing development at the settlement over recent years. Objective 3 of the draft Site Allocations Plan is to To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy. The spatial strategy for Wiltshire contained in the Core Strategy promotes the sustainable development of the County . The proposed removal of the sites at Market Lavington is inconsistent with this objective. The second reason given for the removal of the sites at Market Lavington relates to the relationship between the Site Allocations Plan and neighbourhood planning. In our representations to the previous consultation we made the following general comments about the lack of clarity between the two: The relationship between the draft Wiltshire Housing Site Allocations and emerging neighbourhood plans is not clear. Paragraph 2.22 states that the Site Allocations Plan does not take decisions in areas where Neighbourhood Plans have been made or are well advanced, however does not define this term. There is no guarantee that a draft Neighbourhood Plan will be progressed by the relevant Qualifying Body or be considered to meet the basic conditions by an independent examiner. It is therefore possible that settlements with capacity for housing development have not been comprehensively assessed as part of the DPD plan-making process. With respect to areas where Neighbourhood Plans are well advanced or have been made, Wiltshire Council would be encouraged to take a more positive approach to the preparation of the Housing Site Allocations DPD. The identification of reserve sites would be supported as this would allow for new housing to come forward in the event that a Neighbourhood Plan allocation proved to be unavailable or undeliverable. These comments have further relevance following the decision to delete the allocations at Market Lavington and leave it to the Neighbourhood Plan to deliver the outstanding need in the Community Area. The preparation of the Market Lavington Neighbourhood Plan has been nearly as protracted as that for the Housing Site Allocations Plan. The Market Lavington Neighbourhood Area was designated on 2 March 2015. A draft Neighbourhood Plan is yet to be submitted to the Local Planning Authority. It is recommended that Housing Allocation 1.2 Underhill Nursery Market Lavington be reinstated to the Plan. Persimmon Homes controls land required to facilitate the widening of the Fiddington Hill access highway to an adoptable standard.

**PC32 APPROXIMATE NUMBER OF DWELLINGS** In our previous representations we noted that As a general comment, it is critical that the approximate number of dwellings identified for each proposed site allocation is treated as indicative. For the majority of proposed site allocations, it is not possible at this stage in the planning process to prescribe an absolute figure for the capacity of each site. A design-led approach to the master planning of each site should be adopted, as informed by a detailed understanding of the site constraints and opportunities. Persimmon Homes therefore supports the proposed change to amend the heading in tables to note that the number of dwellings to be provided at each site allocation is approximate . This is consistent with the rest of the Plan and the underpinning Wiltshire Core Strategy.

**PC63 ELIZABETH WAY, TROWBRIDGE - SITE BOUNDARY** Persimmon Homes supports the proposed amendment to the boundary of the Elizabeth Way allocation to correct an error in the draft Site Allocations Plan. The allocation boundary now runs up to the southern boundary of the Elizabeth Way road.

**PC64 ELIZABETH WAY, TROWBRIDGE INCREASE NUMBER OF DWELLINGS** Persimmon Homes supports the amendment to increase the approximate number of dwellings to be delivered at the Elizabeth Way site allocation from 205 to 355. Whilst it should be appreciated that the number of dwellings is approximate, the figure of 205 dwellings stated in the draft Plan equates to a gross density of circa 10 dwellings per hectare, and thus grossly underestimated the potential of the site to contribute to delivering the housing shortfall at the Principal Settlement of Trowbridge. Furthermore, in February 2016 HGT Developments submitted an Outline planning application for up to 170 dwellings on part of the land, which is still to be determined. If Wiltshire Council granted consent to this application which covers circa 40% of the site allocation it would leave only approximately 35 dwellings to be delivered across the remaining circa 60% of the site (or approximately 3 dwellings per hectare). The underestimation of a sites potential to contribute to housing need in a Local Plan causes further issues at the application stage and can frustrate the delivery of new homes. Persimmon Homes supports a design-led approach to masterplanning the site as a whole, which will establish the number of dwellings that can be delivered on the allocation. Persimmon has an interest in part of the allocation and is collaborating with the other site owners / developers to bring the site forward for development. Persimmon would welcome an amendment to the Plan to require a site-wide

masterplan as has been identified for the other large allocations in the draft Wiltshire Housing Site Allocations Plan. PC65 ELIZABETH WAY, TROWBRIDGE HERITAGE IMPACT Persimmon Homes does not object to the proposed change, which seeks to give further recognition to the heritage assets in proximity to the site. It should however be noted that the site is capable of being developed without damaging these assets and their setting. The principal justification given for the proposed change is to reflect the Heritage Impact Assessment prepared by LUC on behalf of the Council in March 2018. The Heritage Impact Assessment considers the significance of the Fieldways Hotel (Grade II\* Listed). The Assessment notes that Fieldways setting makes an important contribution to the significance of the asset and that the most important element of its setting is the relationship between the building and its immediate grounds. The Assessment does note that there are landscape features outside of this area and specifically notes a series of three eyecatcher planting clumps. It should be noted that these landscape features are all positioned within a small field immediately adjacent to the Fieldways Hotel within the allocation site. This field (circa 0.8ha) is not controlled by Persimmon but will likely be retained as a green space. Persimmon would welcome an amendment to the Plan to require a site-wide masterplan as has been identified for the other large allocations in the draft Wiltshire Housing Site Allocations Plan to consider issues such as the potential impact on heritage assets. Persimmon Homes queries the other part of this proposed change to note that the site has high archaeological value. The reason given for making this change is in response to comments from Heritage England. However, Heritage Englands previous comments on the Plan note that the site is medium archaeological value. PC88, P90 EAST OF FARRELLS FIELD, YATTON KEYNELL SITE BOUNDARY Persimmon Homes previous comments noted It is recommended that the proposed allocation red line be amended to remove the track running along the western boundary of the site, to ensure that the masterplanning and development of the site can proceed on a sound basis. The proposed change to amend the allocation boundary to remove the adjacent track is therefore welcomed. It should be noted that the track is not a Public Right of Way. Furthermore its inclusion within the site allocation boundary had caused some local concern that the track may be used as vehicular access, which would not be appropriate. PC89 EAST OF FARRELLS FIELD, YATTON KEYNELL FRA Persimmon Homes does not object to the proposed change to require any planning application to be supported by a Flood Risk Assessment (FRA). Persimmon Homes is preparing a detailed planning application for the development of the site, which is supported by an FRA / Drainage Strategy. PC91 EAST OF FARRELLS FIELD, YATTON KEYNELL SITE ACCESS Persimmon Homes does not object to the proposed change to delete a sentence which stated that access to the site would be taken from Farrells Field. As stated in Persimmon Homes representations to the previous consultation on the Housing Site Allocations Plan, it was envisaged that the site would be accessed from the existing development of Farrells Field via an extension of the road that runs to the site boundary. This option was and remains a technically achievable way of accessing the site. However, following discussions with representatives of Yatton Keynell Parish Council and consultation with the local community who have expressed a preference for the site to be accessed via a new junction directly onto the main road (the B4039 to the north), Persimmon Homes has committed to this alternative access arrangement. Persimmon Homes is preparing a detailed planning application for the development of the site which identifies a vehicular access directly onto the B4039. COMMENTS ON SUPPORTING EVIDENCE Persimmon Homes maintains that there are inconsistencies in the identification of areas of search and the application of the Sustainability Appraisal in the site-selection process. The representations made during the previous consultation on the draft Plan are attached to these comments (representations dated 22 September 2017 consultee ID 983136).

**Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment**

**Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).**

<b>document this representation relates to:</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5147219		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	



<b>Comment ID:</b>	467	<b>Consultee</b> Planner Persimmon Homes (Wessex)	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 983136		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC32				
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<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC89				
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<b>Supporting documents (Please see Objective)</b>	5147219		
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<b>Identify Proposed Change Reference Number</b>	PC90				
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**PC32 APPROXIMATE NUMBER OF DWELLINGS** In our previous representations we noted that As a general comment, it is critical that the approximate number of dwellings identified for each proposed site allocation is treated as indicative. For the majority of proposed site allocations, it is not possible at this stage in the planning process to prescribe an absolute figure for the capacity of each site. A design-led approach to the master planning of each site should be adopted, as informed by a detailed understanding of the site constraints and opportunities. Persimmon Homes therefore supports the proposed change to amend the heading in tables to note that the number of dwellings to be provided at each site allocation is approximate. This is consistent with the rest of the Plan and the underpinning Wiltshire Core Strategy.

**PC63 ELIZABETH WAY, TROWBRIDGE - SITE BOUNDARY** Persimmon Homes supports the proposed amendment to the boundary of the Elizabeth Way allocation to correct an error in the draft Site Allocations Plan. The allocation boundary now runs up to the southern boundary of the Elizabeth Way road.

**PC64 ELIZABETH WAY, TROWBRIDGE INCREASE NUMBER OF DWELLINGS** Persimmon Homes supports the amendment to increase the approximate number of dwellings to be delivered at the Elizabeth Way site allocation from 205 to 355. Whilst it should be appreciated that the number of dwellings is approximate, the figure of 205 dwellings stated in the draft Plan equates to a gross density of circa 10 dwellings per hectare, and thus grossly underestimated the potential of the site to contribute to delivering the housing shortfall at the Principal Settlement of Trowbridge. Furthermore, in February 2016 HGT Developments submitted an Outline planning application for up to 170 dwellings on part of the land, which is still to be determined. If Wiltshire Council granted consent to this application which covers circa 40% of the site allocation it would leave only approximately 35 dwellings to be delivered across the remaining circa 60% of the site (or approximately 3 dwellings per hectare). The underestimation of a sites potential to contribute to housing need in a Local Plan causes further issues at the application stage and can frustrate the delivery of new homes. Persimmon Homes supports a design-led approach to masterplanning the site as a whole, which will establish the number of dwellings that can be delivered on the allocation. Persimmon has an interest in part of the allocation and is collaborating with the other site owners / developers to bring the site forward for development. Persimmon would welcome an amendment to the Plan to require a site-wide

masterplan as has been identified for the other large allocations in the draft Wiltshire Housing Site Allocations Plan. PC65 ELIZABETH WAY, TROWBRIDGE HERITAGE IMPACT Persimmon Homes does not object to the proposed change, which seeks to give further recognition to the heritage assets in proximity to the site. It should however be noted that the site is capable of being developed without damaging these assets and their setting. The principal justification given for the proposed change is to reflect the Heritage Impact Assessment prepared by LUC on behalf of the Council in March 2018. The Heritage Impact Assessment considers the significance of the Fieldways Hotel (Grade II\* Listed). The Assessment notes that Fieldways setting makes an important contribution to the significance of the asset and that the most important element of its setting is the relationship between the building and its immediate grounds. The Assessment does note that there are landscape features outside of this area and specifically notes a series of three eyecatcher planting clumps. It should be noted that these landscape features are all positioned within a small field immediately adjacent to the Fieldways Hotel within the allocation site. This field (circa 0.8ha) is not controlled by Persimmon but will likely be retained as a green space. Persimmon would welcome an amendment to the Plan to require a site-wide masterplan as has been identified for the other large allocations in the draft Wiltshire Housing Site Allocations Plan to consider issues such as the potential impact on heritage assets. Persimmon Homes queries the other part of this proposed change to note that the site has high archaeological value. The reason given for making this change is in response to comments from Heritage England. However, Heritage Englands previous comments on the Plan note that the site is medium archaeological value. PC88, P90 EAST OF FARRELLS FIELD, YATTON KEYNELL SITE BOUNDARY Persimmon Homes previous comments noted It is recommended that the proposed allocation red line be amended to remove the track running along the western boundary of the site, to ensure that the masterplanning and development of the site can proceed on a sound basis. The proposed change to amend the allocation boundary to remove the adjacent track is therefore welcomed. It should be noted that the track is not a Public Right of Way. Furthermore its inclusion within the site allocation boundary had caused some local concern that the track may be used as vehicular access, which would not be appropriate. PC89 EAST OF FARRELLS FIELD, YATTON KEYNELL FRA Persimmon Homes does not object to the proposed change to require any planning application to be supported by a Flood Risk Assessment (FRA). Persimmon Homes is preparing a detailed planning application for the development of the site, which is supported by an FRA / Drainage Strategy. PC91 EAST OF FARRELLS FIELD, YATTON KEYNELL SITE ACCESS Persimmon Homes does not object to the proposed change to delete a sentence which stated that access to the site would be taken from Farrells Field. As stated in Persimmon Homes representations to the previous consultation on the Housing Site Allocations Plan, it was envisaged that the site would be accessed from the existing development of Farrells Field via an extension of the road that runs to the site boundary. This option was and remains a technically achievable way of accessing the site. However, following discussions with representatives of Yatton Keynell Parish Council and consultation with the local community who have expressed a preference for the site to be accessed via a new junction directly onto the main road (the B4039 to the north), Persimmon Homes has committed to this alternative access arrangement. Persimmon Homes is preparing a detailed planning application for the development of the site which identifies a vehicular access directly onto the B4039. COMMENTS ON SUPPORTING EVIDENCE Persimmon Homes maintains that there are inconsistencies in the identification of areas of search and the application of the Sustainability Appraisal in the site-selection process. The representations made during the previous consultation on the draft Plan are attached to these comments (representations dated 22 September 2017 consultee ID 983136).

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<b>document this representation relates to:</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	
<b>Supporting documents (Please see Objective)</b>	5147219		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	



<b>Comment ID:</b>	475	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187935	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5147074</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	476	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187937	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
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<p><b>Supporting documents (Please see Objective)</b></p>	<p>5147074</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	477	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1125220	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

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**Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:**

**Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).**



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<p><b>Supporting documents (Please see Objective)</b></p>	<p>5147074</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
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<b>Comment ID:</b>	478	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187939	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
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	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5147074</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	479	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187940	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. The proposed developments cannot be legally compliant if they do not comply with the Core Strategy. Site 321 development will increase traffic on Court Lane which, as it already has cars parked on it which reduce it to single file, will become even more dangerous.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	5147074		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	480	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 1187949	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. There is a need for 1 and 2 bed roomed and terraced houses (30% mixed starter homes) which was and is being addressed by Plan no. 321 which also is reacting to the original Plan as read by the village (through survey) some 3-4 years ago. Plan 738 should not even be considered it would congest the entrance to the village it harms the views and landscapes of the village and would conflict with the landscape and Salisbury Plain (Special Protection Area). Access to by bike, car or on foot to Plan 738 would be dangerous whereas for the other site 321 would be safer with more space for layout. I have gone through the bullet points for both sites and have ticked those I agree with.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	5147074		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			

<p><b>proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	481	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187949	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Associated evidence documents		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Westbury (July 2018 Submission version) (CATP/19)				

**Please give details of why you support or do not support the updates to the associated evidence documents.**

**Positively prepared** - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses.

There is no requirement for further allocations.

**Justified** - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: *At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled.*

The reduction of 5 houses in PC 94 does not cancel the following points.

Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: *Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.*

The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch.

Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%.

Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport .

The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour.

Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view.

Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area).

Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement.

Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic.

Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a.

There is loss of green space and agricultural land.

Developments of this size will add to the existing pressures on Bratton Surgery.

The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan.

**Effective** - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities.

**Consistent with national policy** - Large scale housing developments in "Large Villages " are not promoted by National Policy.

There is a need for 1 and 2 bedroomed and terraced houses (30% mixed starter homes) which was and is being addressed by Plan no. 321 which also is reacting to the original Plan as read by the village (through survey) some 3-4 years ago.

Plan 738 should not even be considered it would congest the entrance to the village it harms the views and landscapes of the village and would conflict with the landscape and Salisbury Plain (Special Protection Area).

Access to by bike, car or on foot to Plan 738 would be dangerous – whereas for the other site 321 would be safer with more space for layout. I have gone through the bullet points for both sites and have ticked those I agree with.

<b>Supporting documents (Please see Objective)</b>	5147074		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	482	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>		PC94			
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>				

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. The villages of Bratton, Edington and Erlestoke adjoin s special landscape on the scarp face of Salisbury Plain. The area is unique and is a refuge for wildlife. Continued development in this area will damage and destroy this special place for future generations. There are no employment opportunities in Bratton whereas nearby towns of Westbury and Trowbridge have many.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5147074</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			



**Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.**

**Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.**

<b>Comment ID:</b>	483	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187933	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Additional comments: When driving from Westbury along the B3098 and on entering Bratton there is a natural narrowing of the road directly at the point where site 738 meets the B3098 and this narrowing continues to the further edge of the site 321. Therefore both sites touch the B3098 where the road is at its narrowest and this natural chicane extends for the full width of both sites, where there are also slight bends that may restrict vision. People may have noted that a new telegraph pole has been sited slightly further into the field by a few feet at the point where site 738 meets the B3098. Introducing what may be another 70 to 100 vehicles on to the B3098 at that point, I think would dramatically increase the "road risk" to cyclist, pedestrians and vehicle users. Specifically building on site 738 will not doubt have a negative effect on the wildlife that regularly uses the field, Badgers, Foxes, bats, deer, all types of birds and a couple of years ago I noted what I thought was a newt [REDACTED] close to site 738. In my view there are other areas within the Parish of Bratton that are more suitable for housing that will pose less risk to the travelling public.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your</b></p>			

<b>objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	484	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1126766	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	485	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			



	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	486	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1188037	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified	
<b>Identify Proposed Change Reference Number</b>	SBR PC42				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The change proposed in SBR PC42 is unsound due to reasons as follows: 1. It is not justified by the Wiltshire Settlement Boundary Review Methodology published in May 2018; 2. It is based on a submission by West Tisbury Parish Council without consultation with local residents. SBR PC42 does not follow the Review Methodology as published, which states that large gardens, paddocks, orchards and open spaces or allotments are the edge of settlements would be excluded. The changes proposed under SBR PC42 include exactly such categories of land. The lack of consultation by West Tisbury Parish Council on this proposed change is unjustified and represents poor practice. It is understood that West Tisbury Parish Council have now reconsidered the boundary change and are now proposing a change as follows: (Please see original representation) This change recognises inclusion in the settlement of the gardens and garages of 86, 87, 88 and 89 Monmouth Road, but exclude the field adjoining 86 Monmouth Road, the vegetable gardens next to Stanley Cottage Monmouth Road, the line of large conifers forming the field boundary and the space between those trees and the access track. This new proposed boundary change has my support.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>	5152193				

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>I did not submit any comments on the previous stage</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	487	<b>Consultee</b> Castlewood Properties Ventures Ltd	<b>Agent</b> Senior Planner Turley	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1137984	<b>Person ID:</b> 1130975	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC60				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Introduction On behalf of our client, Castlewood Properties Ventures Ltd. (hereafter referred to 'Castlewood'), we write to provide representations to the "Focussed consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan" (WHSAP). We are responding to this consultation in respect of our client's land interest at Land off the A363 at White Horse Business Park Trowbridge, which is proposed allocation H2.2 in the Wiltshire Housing Site Allocations Plan (WHSAP). Castlewood are local developers who can provide greater certainty of delivery, and have a strong track record in delivering development in Wiltshire. We comment specifically in respect of the proposed amendments relating to proposed allocation H2.2, namely PC59 and PC60 and their consequential changes (PC13, PC15, PC17, PC21, PC22, PC25, PC51, PC56). In summary, these proposed amendments seek to reduce the capacity of proposed allocation H2.2 to 'approximately 175 dwellings'. This follows a decision by the Council's Cabinet, relating to perceived coalescence between the proposed allocation site and the village of North Bradley. We consider this in detail in these Representations. These Representations should be viewed alongside the 'Land off the A363 at White Horse Business Park' Vision Document prepared by Tur1ey (November 2018). These Representations should also be read in combination with those from parties who also have an interest in the H2.2 site, on land to the south of Castlewood's parcel.</p> <p>Proposed H2.2 Allocation The Proposed Allocation site H2.2 comprises 18.96ha and extends from Bradley Road at the north to Westbury Road at the south. There are several land interests relating to Proposed Allocation H2.2. Castlewood's interests relate to a 8.37ha parcel at the northern end of the allocation site, closest to the Trowbridge settlement. This northern parcel of land (hereafter referred to 'The Site') is identified in the accompanying Vision Document, The Site fronts onto A363 where the proposed access is to the residential development is to be secured. Trowbridge is a Principal Settlement, situated within the Trowbridge Community Area and located in the North and West Wiltshire Housing Market Area (HMA). Therefore the scope of these representations is focused on the proposed strategy for the North and West Wiltshire HMA, the Trowbridge Community Area and Trowbridge specifically. Previous Representations on behalf of Castlewood were submitted to the Council in September 2017, in response to the WHSAP Pre-Submission consultation, and in February 2018 to provide the Council with an indicative illustrative layout. The following technical reports were all submitted in February 2018 to demonstrate that there are no significant constraints to delivery of residential development in the site: - Baseline Landscape and Visual Appraisal (referred to hereafter as LVA); LVIA Constraints and Opportunities Plan - Flood Risk and Surface Water Drainage Technical Note; - Highways and Transport Technical Note; - Heritage Technical Note; It is not the intention of these Representations to repeat information previously provided, rather to respond to the key changes proposed by this latest consultation. These representations are supported by the following documents, which provide further</p>				

technical information demonstrating the capability of the Proposed Allocation to deliver at least 300 dwellings, of which around 140 dwellings can be provided on the Site: - Land off the A363 at White Horse Business Park Vision Document, prepared by Turley (November 2018) - Ecology Technical Note (November 2018), prepared by Nicholas Pearson Associates The Ecology Technical Note discusses the ecological considerations which have informed the masterplan, and demonstrates that there are no ecological considerations which do not preclude development of the Site for approximately 140 dwellings, including the need for buffers to be retained as dark corridors. WHSAP Proposed Changes With respect to the document EXAM0101 Schedule of Proposed Changes (September 2018), the key changes related to the Proposed Allocation are as follows: - PC59 - Amend the boundary of the allocation as set out in Annex C; And first sentence of paragraph 5.52 to read: "Approximately 25.62 18.96 ha of land off the A363 southwest of the White Horse Business Park is allocated for the development" - PC60 - Amend first sentence of paragraph 5.52 as follows: "land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 225 175 dwellings, as identified on the Policies Map." We do wish to object to PC60. This reduction in dwelling numbers is unjustified, and indeed the allocation quantum should be increased to "at least 300 dwellings", based on the technical evidence and other considerations, such as Trowbridge's identified shortfall. The Representation will set out the justification for this. We note that the Councils evidence base has been updated in respect of: - Wiltshire Housing Site Allocations Plan Sustainability Appraisal Revised September 2018 (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C); - Update to the Wiltshire Housing Site Allocations Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03); - Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a); The Community Area Topic Paper Trowbridge has been amended in relation to site ref. 298 (The Proposed Allocation). The amendments are as follows: Whilst this site is not without constraint (including potential effects on protected bat species and the significance of heritage assets), these can be mitigated through on-site measures. To address these matters as a result in any development scheme on the allocation would not involve the whole SHLAA site option but would nonetheless need to deliver all necessary mitigation. Therefore, the potential dwelling capacity stated in the SHLAA/SHELAA would be reduced to approximately 150 175 dwellings (para 5.24, pg 22) This amendment is not supported by the technical information submitted with our previous representations nor the ecology technical note accompanying this Representation. As set out above, the ecological technical note concludes there are no ecological considerations which preclude development of the Site alone for approximately 140 dwellings, including the need for buffers to be retained as dark corridors in respect of the protected bat species. In relation to heritage assets, there are no listed buildings on the Site itself and the Masterplan identifies that appropriate provision can be made for the setting of listed buildings in the vicinity whilst providing c.140 units on the Site, with the remainder of the c.300 units to be provided on the remaining parts of the Proposed Allocation. It should also be noted that the Community Area Topic Paper has also been amended in relation to the immediately adjacent Elm Grove Farm Proposed Allocation. Ecology (protected bat species) and heritage assets are again raised as a potential constraint, however conversely for this site the amendment concludes that these matters can be mitigated through on site measures and the site's capacity increased. No clear explanation appears to have been provided for the different approach between the sites. It is noted that some of the documents which our previous representations and technical documents commented on, such as the Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 2 (June 2017) (WHSAP/20), have not been updated for the purposes of this consultation. We do not seek to repeat comments previously made in relation to these documents, and would refer you to our previous Representations. In respect of technical considerations we note that the only amendment to the Councils Sustainability Assessment in respect of Proposed Allocation H2.2 (site ref. 298) is in respect of heritage considerations: The Grade II Listed Kings Farmhouse (and its setting), Willow Grove, monuments and gateway to former Baptist Church and Little Common Farm are situated within the site area, and important heritage farmsteads are situated to the north and south of the site. A detailed heritage assessment (building upon the high-level Heritage Impact Assessment prepared by the Council) would be required to support any subsequent planning application. A Heritage Impact Assessment would be required. Archaeological potential of the site is

medium and therefore archaeological assessment would be required (SA Obj. 6). We can confirm that we have no objections to this amended text. It is acknowledged that heritage will be an important consideration for the Proposed Allocation, albeit of less significance to the Site given the location of the Listed Buildings, outwith the Castlewood land interests.

**Background to Allocation** By way of background, the site was submitted to the SHLAA and was assessed under site reference 298. The site passed stage 4a with a stated capacity of 338 dwellings and was progressed as a 'preferred site', however the stated capacity was reduced to 150 dwellings (WHSAP Trowbridge Community Area Topic Paper July 2018, page 18). The assessment of site options (Appendix G) explains this reduction stating "mitigation measures required to address effects on heritage assets, ecology and landscape would result in a reduction to the developable area of the site and a potential reduction in dwelling capacity." (WHSAP Trowbridge Community Area Topic Paper July 2018, page 97). This resulted in the Pre-Submission Draft WHSAP (September 2017) consultation including the site as an allocation for "approximately 150 dwellings" under site reference H2.2. The pre-submission draft was subject to a period of public consultation and subsequent to this consultation, the Council proposed to increase the capacity of the site. This amendment to proposed allocation H2.2 was originally set out in the Council's Cabinet Papers of 15th May 2018, which refer to a capacity increase from approximately 150 to 300 dwellings (Council's Cabinet Papers of 15th May 2018, pages 294, 365). [It is noted that there are inconsistencies in the Council's Cabinet Papers of 15th May 2018, as there is also reference to an increase to 225 dwellings.] This demonstrates that the Council consider that a capacity of approximately 300 dwellings was appropriate for the H2.2 allocation site. The WHSAP was subsequently deferred from consideration at the 15th May 2018 Cabinet meeting to be heard at the 3rd July 2018 Cabinet instead. It is understood this was to allow further consultation on the proposed changes with Wiltshire Councillors and town and parish councils (Minutes of 3rd July 2018 Cabinet, paragraph 257). For the Cabinet Papers of 3rd July 2018, the Council prepared an Addendum following the deferral of the item from Cabinet of 15 May 2018. This Addendum refers to a smaller capacity increase for allocation H2.2 from approximately 150 to 225 dwellings.. At the 3rd July 2018 Cabinet, Cllr Sturgis proposed further changes to the in response to the housing numbers on the Allocation site, understood to be in response to consultation with Wiltshire Councillors and town and parish councils. The following change was proposed:

(c) Amend Proposed Change 39 (site allocation H2.2, land off the A363 at White Horse Business Park, Trowbridge) to reduce the proposed dwelling increase by 50 dwellings This proposed change had the effect of reducing the capacity increase further from approximately 150 to 175 dwellings. The minutes of the 3rd July 2018 Cabinet meeting provide further insight into Member's justification for this change: In justifying the further proposed changes, Cllr Sturgis referred to the addendum, and provided clarification as follows ... the reduction in the increase in housing numbers on site H2.2 would provide for landscape buffer for North Bradley. In response to concerns raised by David Feather that insufficient weight had been given to North Bradley's Neighbourhood Plan, Councillor Sturgis stated that other neighbourhood plans were further 'forward, and could therefore be given greater weight. Councillor Sturgis went on to say that: he hoped that the proposed amendments to the White Horse business park site would go some way to maintaining a gap between North Bradley and Trowbridge; and that Wiltshire Council would continue to work to support the North Bradley neighbourhood plan so that it would be better progressed by the time of the examination in public. The issue of alleged coalescence between the Trowbridge and North Bradley settlements is therefore identified to be one of the key issues from the Council's perspective relating to the Proposed Allocation's capacity. It is noted that the Community Area Topic Paper raises concerns regarding ecological (bat species) and heritage constraints, which would require mitigation in order to be satisfactorily addressed. We dispute the Council's concerns regarding the perceived coalescence of Trowbridge and North Bradley, and the limit on capacity created by the ecological and heritage constraints. For the reasons we will set out below we consider the Council's approach to reducing the overall dwelling capacity on site H2.2 to be unsound. The capacity of proposed allocation H2.2 should be reinstated as approximately 300 dwellings, as per the previous view of Planning Officers .

**Representations** We fervently disagree with the Council's position, that the Proposed Allocation is only capable of accommodating approximately 175 dwellings, in order to maintain a gap between the North Bradley and Trowbridge settlements, and provide appropriate mitigation. Our evidence base (and supported by the representations prepared by Linden Homes in relation to a separate parcel of the Allocation Site) supports a higher capacity. Crucially, the Council's own evidence base supports a higher capacity. For example, the WSHAP

Stage 4a Site Landscape Assessment concludes that the capacity of the Site to accommodate change is described as 'moderate-high', This is discussed further below. We feel that the Proposed Allocation is capable of accommodating at least 300 dwellings, without causing issues of coalescence with the North Bradley settlement. Specifically to these Representations, we feel that the Site (the northern parcel of land defined in the accompanying Vision Document) is capable of accommodating approximately 140 dwellings, again without causing issues of coalescence and provide adequate mitigation. This is now considered in full.

**Background on Relationship to Trowbridge** The Site is in close proximity to the existing settlement boundary of Trowbridge to the north (as defined by the Core Strategy 2015, fig 1), less than 50m to the south of the existing boundary. As part of the WHSAP, the Council are undertaking a settlement boundary review (WHSAP Topic Paper 1 Settlement Boundary Review Methodology, refers). This Topic Paper concludes that the White Horse Business Park to the east of the site meets the methodology for being included within the settlement. [MAP INSERT] Accordingly the Draft WHSAP proposes to include White Horse Business Park within the settlement boundary (fig 2). As a result, in addition to being in close proximity to the existing settlement boundary of Trowbridge to the north, the Site also abuts the proposed settlement boundary of Trowbridge - in its extended form - to the east (as defined by the Draft WHSAP, fig 2). The Site therefore relates well to the Trowbridge settlement and in combination with proposed housing allocation 'Elm Grove Farm', would enhance connectivity between the existing Trowbridge settlement and the established White Horse Business Park. Indeed delivery of residential development on the Allocation Site would bridge the separation between the business park and the wider settlement. The potential of the Allocation Site and the adjacent Elm Grove Farm allocation to be successfully integrated into existing and planned developments in the area, while maintaining a defensible buffer to North Bradley is recognised in the Trowbridge Community Area Topic Paper. The relationship between White Horse Business Park, the Proposed Allocation (ref 298) to the SW and proposed allocation 'Elm Grove Farm' (ref 613/248) to the SE is demonstrated in fig 2. The Site is ideally placed to provide improvements to walking and cycling routes through to the town, and the proposed masterplan shows how these improved linkages can be delivered as part of a residential development. The Proposed Allocation would therefore provide a cohesive and logical extension to Trowbridge. It should be noted that the Site would be directly connected to the settlement to the north and east, and would very much look to the north and Trowbridge in terms of connectivity and access to facilities.

**[MAP INSERT] Landscape Evidence and Design Solution** The previous Representations submitted to the Council on behalf of Castlewood in February 2018 provide the Council with an indicative illustrative layout and a Landscape and Visual Appraisal which concludes that there are no significant constraints to the delivery of residential units on the site. The LVA concludes that visually, the Site is relatively well contained on account of the existing hedgerow structure, generally flat topography, the surrounding mature tree belts and surrounding development. The visibility of the site is limited to occasional short distance views from immediate visual receptors. In the wider surrounding landscape, the cumulative effect of field boundary hedgerows and the flat low lying topography provide visual containment. Although, the site is likely to be glimpsed from raised land to the southeast, the intervening distance will prevent its features being discernible. The Site therefore has low visual prominence. There are strong landscape buffers on the edge of North Bradley and the development provides opportunities to reinforce existing landscape features. This will lead to a softening of views towards Trowbridge from North Bradley, especially as the existing settlement edge of Trowbridge is defined by commercial development and the proposed development will provide a softer, more permanent edge. The LVA acknowledges that whilst there would be some physical reduction in the separation between Trowbridge and North Bradley as a result of the Proposed Allocation, the visual effects could be minimised and mitigated. The proposed Masterplan provided in the accompanying Vision Document incorporates such mitigation measures, including:

- The LVA acknowledges that a visual break is experienced between the settlements of Trowbridge and North Bradley when travelling along Woodmarsh. Accordingly the masterplan has not identified development in those areas most significant to the perceived visual separation between North Bradley and Trowbridge, as informed by the LVA. This preserves the setting of North Bradley village and its integrity.
- The northern development parcel is set back considerably from Woodmarsh to reinforce the visual separation from North Bradley and it is proposed that the development in this area will generally be of lower density so as to set the proposed development within a landscape context and that the built form is more visually connected to the south of Trowbridge and visually



buffer the scheme from North Bradley. - The proposed masterplan proposes to implement significant new planting along the south-western boundary, in addition to significant existing planting to reinforce the visual separation between the proposed development and North Bradley. The LVA confirms that the development of the site could be achieved without resulting in significant landscape and/or visual impacts (in relation to the receptors identified in the LVA including the A363, Woodmarsh and residential properties on the eastern edge of North Bradley). In addition, the findings of the Councils own evidence base are significant. The WHSAP Stage 4a Site Landscape Assessment (June 2017) concludes that the overall magnitude of effect on views if the site were to be developed is identified as 'low adverse'. The capacity of Site 298 to accommodate change is described as 'moderate-high'. It is considered, therefore, that the site should be allocated for a much higher number of dwellings given the sustainable location and absence of any constraints which cannot be mitigated against. The overall effect will be to proportionately increase the quantum of market and affordable dwellings, which can be achieved through the Proposed Allocation, whilst simultaneously protecting the integrity of North Bradley as a village. Indeed, the opportunity to achieve a comprehensive design will provide greater opportunities for more meaningful green infrastructure provision, landscaping and open space. In summary, we contend that delivery of approximately 300 dwellings on the Proposed Allocation would not lead to unacceptable coalescence between Trowbridge and North Bradley. Residential development on the site would link, both visually and physically, primarily with Trowbridge and the adjacent White Horse Business Park, which is proposed in the WHSAP to form part of the Trowbridge settlement boundary. As demonstrated in the accompanying Vision Document, development on the site would be sensitively designed with the incorporation of new or strengthened landscape buffers and careful siting of built form to protect visual separation between the two settlements. Utilising the approach set out in the Vision Document, the Site could accommodate c. 140 units, as part of a wider 300 unit allocation.

**Housing Need** As a Principal Settlement, Trowbridge is a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026 and beyond. There are, however, severe constraints to the growth of Trowbridge. In particular, with Green Belt and Flood Zone designations to the north and west of Trowbridge (Fig 3), opportunities to expand Trowbridge in order to accommodate the identified housing need are limited. In proposing the allocation of this site, the Council identified that development of the site for housing would contribute to the area strategy for the town by boosting the supply of homes to help meet indicative requirements" [MAP INSERT] In the context of Trowbridge being a focus for growth and taking a large proportion of housing need, we wish to comment on PC25, which is a factual update to reflect the latest published Housing Land Supply Statement (March 2018) and to reflect PC55, PC60, PC64 and PC70 that propose higher densities on site allocations to make best use of land. PC25 relates to the following amended paragraph: Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 1,050 dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220 1,297."

In addition, related to the Trowbridge Community Area, the Council's Housing Land Supply Statement Addendum July 2018 Submission Version (ref: TOP/03C) indicates there is still an indicative residual requirement for the remainder of the Trowbridge Community Area of at least 2,230 dwellings during the remainder of the Plan period up to 2026. As things stand therefore the Council are not National planning policy is clear that the Council must look at its residential allocations beyond five years to ensure there is a consistent pipeline for bringing forward new residential development. The Council, despite the amendments, acknowledge that housing development at Trowbridge will fall short of the requirements. By failing to allocating sufficient quantum of new housing in the WHSAP, the Council is currently failing to fully meet its identified housing needs. The Plan has not therefore been positively prepared. To ensure a sound Plan, which is consistent with national planning policy, it is essential that either: a) additional site are identified and allocated; or b) greater quantum of housing is allocated on existing/ proposed allocations. In relation to option a), as set out above Trowbridge lacks genuine, alternative options to extend the settlement due to constraints, including Green Belt designations and Flood Zone primarily to the north and west. Consideration should therefore be given to intensify allocations proposed by the WHSAP, where technical constraints do not preclude this. As has been demonstrated by these Representations,

	<p>and in those previously submitted, there are no technical constraints which preclude a greater quantum of development than currently proposed in the WHSAP. Indeed, the Council have previously identified the potential of this site to accommodate c 300 dwellings, and the proposed reduction to 175 to accommodate ecology and heritage mitigation measures is unjustified. The technical work undertaken, and submitted to the Council during the WHSAP process demonstrate that the Proposed Allocation is capable of accommodating at least 300 dwellings with the incorporation of necessary mitigation measures. The sustainability appraisal undertaken by the Council identify the Proposed Allocation as a 'more sustainable' site. As such, priority should be maximising the housing numbers on this site in the first instance to address the outstanding house requirement, rather than looking towards 'less sustainable sites. Conclusion In summary, it is contended that proposed modification PC60 (and its consequential changes) to the WHSAP render the document unsound and contrary to paragraph 182 of the NPPF (2012). The proposed modification is inconsistent with the technical information provided to the Council, and the Council's own evidence base documents, which recognises the capability of the Proposed Allocation to accommodate a greater quantum of residential units whilst still maintaining appropriate separation between Trowbridge and North Bradley and providing adequate mitigation. The reduction in dwelling numbers for Proposed Allocation H2.2 does not represent positive preparation of the WHSAP. There is an identified housing need in the Trowbridge Community Area and the WHSAP as currently proposed does not meet the full requirement. It is recognised that mitigation will be required in relation to heritage and ecology matters, however the technical work undertaken has identified that appropriate mitigation can be accommodated with a greater quantum of dwellings than 175. Indeed, the accompanying Vision Document relating specially to our client's interests on the north parcel, identifies around 140 dwellings can be appropriately accommodated on that part of the allocation alone. In order to remedy this and make the WHSAP sound, we request that the capacity of the Proposed Allocation H2.2 is reinstated as "at least 300 dwellings", and consequential changes subsequently amended. Specifically to these Representations, we request that recognition is given to the capability of the Site to accommodating approximately 140 dwellings as part of the H2.2 allocation. In order to effectively put this case before the Inspector and address any questions they may have and to also rebuff any argument the Council may make for proceeding with proposed modification PC60 and its consequential changes we consider it necessary to attend the Examination Hearings in a speaking capacity. For reference, we append a full set of additional details as follows. These reports and drawings concern the proposed development of the Site and provide information regarding constraints: Vision Document Ecology Technical Note Flood Risk &amp; Drainage Technical Note Heritage Technical Note Highways Technical Note Landscape and Visual Appraisal</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	488	<b>Consultee</b> Castlewood Properties Ventures Ltd	<b>Agent</b> Senior Planner Turley	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1137984	<b>Person ID:</b> 1130975	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC13				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Introduction On behalf of our client, Castlewood Properties Ventures Ltd. (hereafter referred to 'Castlewood'), we write to provide representations to the "Focussed consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan" (WHSAP). We are responding to this consultation in respect of our client's land interest at Land off the A363 at White Horse Business Park Trowbridge, which is proposed allocation H2.2 in the Wiltshire Housing Site Allocations Plan (WHSAP). Castlewood are local developers who can provide greater certainty of delivery, and have a strong track record in delivering development in Wiltshire. We comment specifically in respect of the proposed amendments relating to proposed allocation H2.2, namely PC59 and PC60 and their consequential changes (PC13, PC15, PC17, PC21, PC22, PC25, PC51, PC56). In summary, these proposed amendments seek to reduce the capacity of proposed allocation H2.2 to 'approximately 175 dwellings'. This follows a decision by the Council's Cabinet, relating to perceived coalescence between the proposed allocation site and the village of North Bradley. We consider this in detail in these Representations. These Representations should be viewed alongside the 'Land off the A363 at White Horse Business Park' Vision Document prepared by Tur1ey (November 2018). These Representations should also be read in combination with those from parties who also have an interest in the H2.2 site, on land to the south of Castlewood's parcel.</p> <p>Proposed H2.2 Allocation The Proposed Allocation site H2.2 comprises 18.96ha and extends from Bradley Road at the north to Westbury Road at the south. There are several land interests relating to Proposed Allocation H2.2. Castlewood's interests relate to a 8.37ha parcel at the northern end of the allocation site, closest to the Trowbridge settlement. This northern parcel of land (hereafter referred to 'The Site') is identified in the accompanying Vision Document, The Site fronts onto A363 where the proposed access is to the residential development is to be secured. Trowbridge is a Principal Settlement, situated within the Trowbridge Community Area and located in the North and West Wiltshire Housing Market Area (HMA). Therefore the scope of these representations is focused on the proposed strategy for the North and West Wiltshire HMA, the Trowbridge Community Area and Trowbridge specifically. Previous Representations on behalf of Castlewood were submitted to the Council in September 2017, in response to the WHSAP Pre-Submission consultation, and in February 2018 to provide the Council with an indicative illustrative layout. The following technical reports were all submitted in February 2018 to demonstrate that there are no significant constraints to delivery of residential development in the site: - Baseline Landscape and Visual Appraisal (referred to hereafter as LVA); LVIA Constraints and Opportunities Plan - Flood Risk and Surface Water Drainage Technical Note; - Highways and Transport Technical Note; - Heritage Technical Note; It is not the intention of these Representations to repeat information previously provided, rather to respond to the key changes proposed by this latest consultation. These representations are supported by the following documents, which provide further</p>				

technical information demonstrating the capability of the Proposed Allocation to deliver at least 300 dwellings, of which around 140 dwellings can be provided on the Site: - Land off the A363 at White Horse Business Park Vision Document, prepared by Turley (November 2018) - Ecology Technical Note (November 2018), prepared by Nicholas Pearson Associates. The Ecology Technical Note discusses the ecological considerations which have informed the masterplan, and demonstrates that there are no ecological considerations which do not preclude development of the Site for approximately 140 dwellings, including the need for buffers to be retained as dark corridors. WHSAP Proposed Changes. With respect to the document EXAM0101 Schedule of Proposed Changes (September 2018), the key changes related to the Proposed Allocation are as follows: - PC59 - Amend the boundary of the allocation as set out in Annex C; And first sentence of paragraph 5.52 to read: "Approximately 25.62 18.96 ha of land off the A363 southwest of the White Horse Business Park is allocated for the development" - PC60 - Amend first sentence of paragraph 5.52 as follows: "land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 225 175 dwellings, as identified on the Policies Map." We do wish to object to PC60. This reduction in dwelling numbers is unjustified, and indeed the allocation quantum should be increased to "at least 300 dwellings", based on the technical evidence and other considerations, such as Trowbridge's identified shortfall. The Representation will set out the justification for this. We note that the Council's evidence base has been updated in respect of: - Wiltshire Housing Site Allocations Plan Sustainability Appraisal Revised September 2018 (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C); - Update to the Wiltshire Housing Site Allocations Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03); - Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a); The Community Area Topic Paper Trowbridge has been amended in relation to site ref. 298 (The Proposed Allocation). The amendments are as follows: Whilst this site is not without constraint (including potential effects on protected bat species and the significance of heritage assets), these can be mitigated through on-site measures. To address these matters as a result in any development scheme on the allocation would not involve the whole SHLAA site option but would nonetheless need to deliver all necessary mitigation. Therefore, the potential dwelling capacity stated in the SHLAA/SHELAA would be reduced to approximately 150 175 dwellings (para 5.24, pg 22). This amendment is not supported by the technical information submitted with our previous representations nor the ecology technical note accompanying this Representation. As set out above, the ecological technical note concludes there are no ecological considerations which preclude development of the Site alone for approximately 140 dwellings, including the need for buffers to be retained as dark corridors in respect of the protected bat species. In relation to heritage assets, there are no listed buildings on the Site itself and the Masterplan identifies that appropriate provision can be made for the setting of listed buildings in the vicinity whilst providing c.140 units on the Site, with the remainder of the c.300 units to be provided on the remaining parts of the Proposed Allocation. It should also be noted that the Community Area Topic Paper has also been amended in relation to the immediately adjacent Elm Grove Farm Proposed Allocation. Ecology (protected bat species) and heritage assets are again raised as a potential constraint, however conversely for this site the amendment concludes that these matters can be mitigated through on-site measures and the site's capacity increased. No clear explanation appears to have been provided for the different approach between the sites. It is noted that some of the documents which our previous representations and technical documents commented on, such as the Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 2 (June 2017) (WHSAP/20), have not been updated for the purposes of this consultation. We do not seek to repeat comments previously made in relation to these documents, and would refer you to our previous Representations. In respect of technical considerations we note that the only amendment to the Council's Sustainability Assessment in respect of Proposed Allocation H2.2 (site ref. 298) is in respect of heritage considerations: The Grade II Listed Kings Farmhouse (and its setting), Willow Grove, monuments and gateway to former Baptist Church and Little Common Farm are situated within the site area, and important heritage farmsteads are situated to the north and south of the site. A detailed heritage assessment (building upon the high-level Heritage Impact Assessment prepared by the Council) would be required to support any subsequent planning application. A Heritage Impact Assessment would be required. Archaeological potential of the site is

medium and therefore archaeological assessment would be required (SA Obj. 6). We can confirm that we have no objections to this amended text. It is acknowledged that heritage will be an important consideration for the Proposed Allocation, albeit of less significance to the Site given the location of the Listed Buildings, outwith the Castlewood land interests.

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**[MAP INSERT] Landscape Evidence and Design Solution** The previous Representations submitted to the Council on behalf of Castlewood in February 2018 provide the Council with an indicative illustrative layout and a Landscape and Visual Appraisal which concludes that there are no significant constraints to the delivery of residential units on the site. The LVA concludes that visually, the Site is relatively well contained on account of the existing hedgerow structure, generally flat topography, the surrounding mature tree belts and surrounding development. The visibility of the site is limited to occasional short distance views from immediate visual receptors. In the wider surrounding landscape, the cumulative effect of field boundary hedgerows and the flat low lying topography provide visual containment. Although, the site is likely to be glimpsed from raised land to the southeast, the intervening distance will prevent its features being discernible. The Site therefore has low visual prominence. There are strong landscape buffers on the edge of North Bradley and the development provides opportunities to reinforce existing landscape features. This will lead to a softening of views towards Trowbridge from North Bradley, especially as the existing settlement edge of Trowbridge is defined by commercial development and the proposed development will provide a softer, more permanent edge. The LVA acknowledges that whilst there would be some physical reduction in the separation between Trowbridge and North Bradley as a result of the Proposed Allocation, the visual effects could be minimised and mitigated. The proposed Masterplan provided in the accompanying Vision Document incorporates such mitigation measures, including:

- The LVA acknowledges that a visual break is experienced between the settlements of Trowbridge and North Bradley when travelling along Woodmarsh. Accordingly the masterplan has not identified development in those areas most significant to the perceived visual separation between North Bradley and Trowbridge, as informed by the LVA. This preserves the setting of North Bradley village and its integrity.
- The northern development parcel is set back considerably from Woodmarsh to reinforce the visual separation from North Bradley and it is proposed that the development in this area will generally be of lower density so as to set the proposed development within a landscape context and that the built form is more visually connected to the south of Trowbridge and visually

buffer the scheme from North Bradley. - The proposed masterplan proposes to implement significant new planting along the south-western boundary, in addition to significant existing planting to reinforce the visual separation between the proposed development and North Bradley. The LVA confirms that the development of the site could be achieved without resulting in significant landscape and/or visual impacts (in relation to the receptors identified in the LVA including the A363, Woodmarsh and residential properties on the eastern edge of North Bradley). In addition, the findings of the Council's own evidence base are significant. The WHSAP Stage 4a Site Landscape Assessment (June 2017) concludes that the overall magnitude of effect on views if the site were to be developed is identified as 'low adverse'. The capacity of Site 298 to accommodate change is described as 'moderate-high'. It is considered, therefore, that the site should be allocated for a much higher number of dwellings given the sustainable location and absence of any constraints which cannot be mitigated against. The overall effect will be to proportionately increase the quantum of market and affordable dwellings, which can be achieved through the Proposed Allocation, whilst simultaneously protecting the integrity of North Bradley as a village. Indeed, the opportunity to achieve a comprehensive design will provide greater opportunities for more meaningful green infrastructure provision, landscaping and open space. In summary, we contend that delivery of approximately 300 dwellings on the Proposed Allocation would not lead to unacceptable coalescence between Trowbridge and North Bradley. Residential development on the site would link, both visually and physically, primarily with Trowbridge and the adjacent White Horse Business Park, which is proposed in the WHSAP to form part of the Trowbridge settlement boundary. As demonstrated in the accompanying Vision Document, development on the site would be sensitively designed with the incorporation of new or strengthened landscape buffers and careful siting of built form to protect visual separation between the two settlements. Utilising the approach set out in the Vision Document, the Site could accommodate c. 140 units, as part of a wider 300 unit allocation.

**Housing Need** As a Principal Settlement, Trowbridge is a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026 and beyond. There are, however, severe constraints to the growth of Trowbridge. In particular, with Green Belt and Flood Zone designations to the north and west of Trowbridge (Fig 3), opportunities to expand Trowbridge in order to accommodate the identified housing need are limited. In proposing the allocation of this site, the Council identified that development of the site for housing would contribute to the area strategy for the town by boosting the supply of homes to help meet indicative requirements" [MAP INSERT] In the context of Trowbridge being a focus for growth and taking a large proportion of housing need, we wish to comment on PC25, which is a factual update to reflect the latest published Housing Land Supply Statement (March 2018) and to reflect PC55, PC60, PC64 and PC70 that propose higher densities on site allocations to make best use of land. PC25 relates to the following amended paragraph: Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 1,050 dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220 1,297."

In addition, related to the Trowbridge Community Area, the Council's Housing Land Supply Statement Addendum July 2018 Submission Version (ref: TOP/03C) indicates there is still an indicative residual requirement for the remainder of the Trowbridge Community Area of at least 2,230 dwellings during the remainder of the Plan period up to 2026. As things stand therefore the Council are not National planning policy is clear that the Council must look at its residential allocations beyond five years to ensure there is a consistent pipeline for bringing forward new residential development. The Council, despite the amendments, acknowledge that housing development at Trowbridge will fall short of the requirements. By failing to allocating sufficient quantum of new housing in the WHSAP, the Council is currently failing to fully meet its identified housing needs. The Plan has not therefore been positively prepared. To ensure a sound Plan, which is consistent with national planning policy, it is essential that either: a) additional site are identified and allocated; or b) greater quantum of housing is allocated on existing/ proposed allocations. In relation to option a), as set out above Trowbridge lacks genuine, alternative options to extend the settlement due to constraints, including Green Belt designations and Flood Zone primarily to the north and west. Consideration should therefore be given to intensify allocations proposed by the WHSAP, where technical constraints do not preclude this. As has been demonstrated by these Representations,



	<p>and in those previously submitted, there are no technical constraints which preclude a greater quantum of development than currently proposed in the WHSAP. Indeed, the Council have previously identified the potential of this site to accommodate c 300 dwellings, and the proposed reduction to 175 to accommodate ecology and heritage mitigation measures is unjustified. The technical work undertaken, and submitted to the Council during the WHSAP process demonstrate that the Proposed Allocation is capable of accommodating at least 300 dwellings with the incorporation of necessary mitigation measures. The sustainability appraisal undertaken by the Council identify the Proposed Allocation as a 'more sustainable' site. As such, priority should be maximising the housing numbers on this site in the first instance to address the outstanding house requirement, rather than looking towards 'less sustainable sites. Conclusion In summary, it is contended that proposed modification PC60 (and its consequential changes) to the WHSAP render the document unsound and contrary to paragraph 182 of the NPPF (2012). The proposed modification is inconsistent with the technical information provided to the Council, and the Council's own evidence base documents, which recognises the capability of the Proposed Allocation to accommodate a greater quantum of residential units whilst still maintaining appropriate separation between Trowbridge and North Bradley and providing adequate mitigation. The reduction in dwelling numbers for Proposed Allocation H2.2 does not represent positive preparation of the WHSAP. There is an identified housing need in the Trowbridge Community Area and the WHSAP as currently proposed does not meet the full requirement. It is recognised that mitigation will be required in relation to heritage and ecology matters, however the technical work undertaken has identified that appropriate mitigation can be accommodated with a greater quantum of dwellings than 175. Indeed, the accompanying Vision Document relating specially to our client's interests on the north parcel, identifies around 140 dwellings can be appropriately accommodated on that part of the allocation alone. In order to remedy this and make the WHSAP sound, we request that the capacity of the Proposed Allocation H2.2 is reinstated as "at least 300 dwellings", and consequential changes subsequently amended. Specifically to these Representations, we request that recognition is given to the capability of the Site to accommodating approximately 140 dwellings as part of the H2.2 allocation. In order to effectively put this case before the Inspector and address any questions they may have and to also rebuff any argument the Council may make for proceeding with proposed modification PC60 and its consequential changes we consider it necessary to attend the Examination Hearings in a speaking capacity. For reference, we append a full set of additional details as follows. These reports and drawings concern the proposed development of the Site and provide information regarding constraints: Vision Document Ecology Technical Note Flood Risk &amp; Drainage Technical Note Heritage Technical Note Highways Technical Note Landscape and Visual Appraisal</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	489	<b>Consultee</b> Castlewood Properties Ventures Ltd	<b>Agent</b> Senior Planner Turley	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1137984	<b>Person ID:</b> 1130975	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC15				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Introduction On behalf of our client, Castlewood Properties Ventures Ltd. (hereafter referred to 'Castlewood'), we write to provide representations to the "Focussed consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan" (WHSAP). We are responding to this consultation in respect of our client's land interest at Land off the A363 at White Horse Business Park Trowbridge, which is proposed allocation H2.2 in the Wiltshire Housing Site Allocations Plan (WHSAP). Castlewood are local developers who can provide greater certainty of delivery, and have a strong track record in delivering development in Wiltshire. We comment specifically in respect of the proposed amendments relating to proposed allocation H2.2, namely PC59 and PC60 and their consequential changes (PC13, PC15, PC17, PC21, PC22, PC25, PC51, PC56). In summary, these proposed amendments seek to reduce the capacity of proposed allocation H2.2 to 'approximately 175 dwellings'. This follows a decision by the Council's Cabinet, relating to perceived coalescence between the proposed allocation site and the village of North Bradley. We consider this in detail in these Representations. These Representations should be viewed alongside the 'Land off the A363 at White Horse Business Park' Vision Document prepared by Tur1ey (November 2018). These Representations should also be read in combination with those from parties who also have an interest in the H2.2 site, on land to the south of Castlewood's parcel.</p> <p>Proposed H2.2 Allocation The Proposed Allocation site H2.2 comprises 18.96ha and extends from Bradley Road at the north to Westbury Road at the south. There are several land interests relating to Proposed Allocation H2.2. Castlewood's interests relate to a 8.37ha parcel at the northern end of the allocation site, closest to the Trowbridge settlement. This northern parcel of land (hereafter referred to 'The Site') is identified in the accompanying Vision Document, The Site fronts onto A363 where the proposed access is to the residential development is to be secured. Trowbridge is a Principal Settlement, situated within the Trowbridge Community Area and located in the North and West Wiltshire Housing Market Area (HMA). Therefore the scope of these representations is focused on the proposed strategy for the North and West Wiltshire HMA, the Trowbridge Community Area and Trowbridge specifically. Previous Representations on behalf of Castlewood were submitted to the Council in September 2017, in response to the WHSAP Pre-Submission consultation, and in February 2018 to provide the Council with an indicative illustrative layout. The following technical reports were all submitted in February 2018 to demonstrate that there are no significant constraints to delivery of residential development in the site: - Baseline Landscape and Visual Appraisal (referred to hereafter as LVA); LVIA Constraints and Opportunities Plan - Flood Risk and Surface Water Drainage Technical Note; - Highways and Transport Technical Note; - Heritage Technical Note; It is not the intention of these Representations to repeat information previously provided, rather to respond to the key changes proposed by this latest consultation. These representations are supported by the following documents, which provide further</p>				

technical information demonstrating the capability of the Proposed Allocation to deliver at least 300 dwellings, of which around 140 dwellings can be provided on the Site: - Land off the A363 at White Horse Business Park Vision Document, prepared by Turley (November 2018) - Ecology Technical Note (November 2018), prepared by Nicholas Pearson Associates. The Ecology Technical Note discusses the ecological considerations which have informed the masterplan, and demonstrates that there are no ecological considerations which do not preclude development of the Site for approximately 140 dwellings, including the need for buffers to be retained as dark corridors. WHSAP Proposed Changes. With respect to the document EXAM0101 Schedule of Proposed Changes (September 2018), the key changes related to the Proposed Allocation are as follows: - PC59 - Amend the boundary of the allocation as set out in Annex C; And first sentence of paragraph 5.52 to read: "Approximately 25.62 18.96 ha of land off the A363 southwest of the White Horse Business Park is allocated for the development" - PC60 - Amend first sentence of paragraph 5.52 as follows: "land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 225 175 dwellings, as identified on the Policies Map." We do wish to object to PC60. This reduction in dwelling numbers is unjustified, and indeed the allocation quantum should be increased to "at least 300 dwellings", based on the technical evidence and other considerations, such as Trowbridge's identified shortfall. The Representation will set out the justification for this. We note that the Council's evidence base has been updated in respect of: - Wiltshire Housing Site Allocations Plan Sustainability Appraisal Revised September 2018 (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C); - Update to the Wiltshire Housing Site Allocations Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03); - Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a); The Community Area Topic Paper Trowbridge has been amended in relation to site ref. 298 (The Proposed Allocation). The amendments are as follows: Whilst this site is not without constraint (including potential effects on protected bat species and the significance of heritage assets), these can be mitigated through on-site measures. To address these matters as a result in any development scheme on the allocation would not involve the whole SHLAA site option but would nonetheless need to deliver all necessary mitigation. Therefore, the potential dwelling capacity stated in the SHLAA/SHELAA would be reduced to approximately 150 175 dwellings (para 5.24, pg 22). This amendment is not supported by the technical information submitted with our previous representations nor the ecology technical note accompanying this Representation. As set out above, the ecological technical note concludes there are no ecological considerations which preclude development of the Site alone for approximately 140 dwellings, including the need for buffers to be retained as dark corridors in respect of the protected bat species. In relation to heritage assets, there are no listed buildings on the Site itself and the Masterplan identifies that appropriate provision can be made for the setting of listed buildings in the vicinity whilst providing c.140 units on the Site, with the remainder of the c.300 units to be provided on the remaining parts of the Proposed Allocation. It should also be noted that the Community Area Topic Paper has also been amended in relation to the immediately adjacent Elm Grove Farm Proposed Allocation. Ecology (protected bat species) and heritage assets are again raised as a potential constraint, however conversely for this site the amendment concludes that these matters can be mitigated through on-site measures and the site's capacity increased. No clear explanation appears to have been provided for the different approach between the sites. It is noted that some of the documents which our previous representations and technical documents commented on, such as the Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 2 (June 2017) (WHSAP/20), have not been updated for the purposes of this consultation. We do not seek to repeat comments previously made in relation to these documents, and would refer you to our previous Representations. In respect of technical considerations we note that the only amendment to the Council's Sustainability Assessment in respect of Proposed Allocation H2.2 (site ref. 298) is in respect of heritage considerations: The Grade II Listed Kings Farmhouse (and its setting), Willow Grove, monuments and gateway to former Baptist Church and Little Common Farm are situated within the site area, and important heritage farmsteads are situated to the north and south of the site. A detailed heritage assessment (building upon the high-level Heritage Impact Assessment prepared by the Council) would be required to support any subsequent planning application. A Heritage Impact Assessment would be required. Archaeological potential of the site is

medium and therefore archaeological assessment would be required (SA Obj. 6). We can confirm that we have no objections to this amended text. It is acknowledged that heritage will be an important consideration for the Proposed Allocation, albeit of less significance to the Site given the location of the Listed Buildings, outwith the Castlewood land interests. Background to Allocation By way of background, the site was submitted to the SHLAA and was assessed under site reference 298. The site passed stage 4a with a stated capacity of 338 dwellings and was progressed as a 'preferred site', however the stated capacity was reduced to 150 dwellings (WHSAP Trowbridge Community Area Topic Paper July 2018, page 18). The assessment of site options (Appendix G) explains this reduction stating "mitigation measures required to address effects on heritage assets, ecology and landscape would result in a reduction to the developable area of the site and a potential reduction in dwelling capacity." (WHSAP Trowbridge Community Area Topic Paper July 2018, page 97). This resulted in the Pre-Submission Draft WHSAP (September 2017) consultation including the site as an allocation for "approximately 150 dwellings" under site reference H2.2. The pre-submission draft was subject to a period of public consultation and subsequent to this consultation, the Council proposed to increase the capacity of the site. This amendment to proposed allocation H2.2 was originally set out in the Council's Cabinet Papers of 15th May 2018, which refer to a capacity increase from approximately 150 to 300 dwellings (Council's Cabinet Papers of 15th May 2018, pages 294, 365). [It is noted that there are inconsistencies in the Council's Cabinet Papers of 15th May 2018, as there is also reference to an increase to 225 dwellings.] This demonstrates that the Council consider that a capacity of approximately 300 dwellings was appropriate for the H2.2 allocation site. The WHSAP was subsequently deferred from consideration at the 15th May 2018 Cabinet meeting to be heard at the 3rd July 2018 Cabinet instead. It is understood this was to allow further consultation on the proposed changes with Wiltshire Councillors and town and parish councils (Minutes of 3rd July 2018 Cabinet, paragraph 257). For the Cabinet Papers of 3rd July 2018, the Council prepared an Addendum following the deferral of the item from Cabinet of 15 May 2018. This Addendum refers to a smaller capacity increase for allocation H2.2 from approximately 150 to 225 dwellings.. At the 3rd July 2018 Cabinet, Cllr Sturgis proposed further changes to the in response to the housing numbers on the Allocation site, understood to be in response to consultation with Wiltshire Councillors and town and parish councils. The following change was proposed: (c) Amend Proposed Change 39 (site allocation H2.2, land off the A363 at White Horse Business Park, Trowbridge) to reduce the proposed dwelling increase by 50 dwellings This proposed change had the effect of reducing the capacity increase further from approximately 150 to 175 dwellings. The minutes of the 3rd July 2018 Cabinet meeting provide further insight into Member's justification for this change: In justifying the further proposed changes, Cllr Sturgis referred to the addendum, and provided clarification as follows ... the reduction in the increase in housing numbers on site H2.2 would provide for landscape buffer for North Bradley. In response to concerns raised by David Feather that insufficient weight had been given to North Bradley's Neighbourhood Plan, Councillor Sturgis stated that other neighbourhood plans were further 'forward, and could therefore be given greater weight. Councillor Sturgis went on to say that: he hoped that the proposed amendments to the White Horse business park site would go some way to maintaining a gap between North Bradley and Trowbridge; and that Wiltshire Council would continue to work to support the North Bradley neighbourhood plan so that it would be better progressed by the time of the examination in public. The issue of alleged coalescence between the Trowbridge and North Bradley settlements is therefore identified to be one of the key issues from the Council's perspective relating to the Proposed Allocation's capacity. It is noted that the Community Area Topic Paper raises concerns regarding ecological (bat species) and heritage constraints, which would require mitigation in order to be satisfactorily addressed. We dispute the Council's concerns regarding the perceived coalescence of Trowbridge and North Bradley, and the limit on capacity created by the ecological and heritage constraints. For the reasons we will set out below we consider the Council's approach to reducing the overall dwelling capacity on site H2.2 to be unsound. The capacity of proposed allocation H2.2 should be reinstated as approximately 300 dwellings, as per the previous view of Planning Officers. Representations We fervently disagree with the Council's position, that the Proposed Allocation is only capable of accommodating approximately 175 dwellings, in order to maintain a gap between the North Bradley and Trowbridge settlements, and provide appropriate mitigation. Our evidence base (and supported by the representations prepared by Linden Homes in relation to a separate parcel of the Allocation Site) supports a higher capacity. Crucially, the Council's own evidence base supports a higher capacity. For example, the WSHAP

Stage 4a Site Landscape Assessment concludes that the capacity of the Site to accommodate change is described as 'moderate-high', This is discussed further below. We feel that the Proposed Allocation is capable of accommodating at least 300 dwellings, without causing issues of coalescence with the North Bradley settlement. Specifically to these Representations, we feel that the Site (the northern parcel of land defined in the accompanying Vision Document) is capable of accommodating approximately 140 dwellings, again without causing issues of coalescence and provide adequate mitigation. This is now considered in full.

**Background on Relationship to Trowbridge** The Site is in close proximity to the existing settlement boundary of Trowbridge to the north (as defined by the Core Strategy 2015, fig 1), less than 50m to the south of the existing boundary. As part of the WHSAP, the Council are undertaking a settlement boundary review (WHSAP Topic Paper 1 Settlement Boundary Review Methodology, refers). This Topic Paper concludes that the White Horse Business Park to the east of the site meets the methodology for being included within the settlement. [MAP INSERT] Accordingly the Draft WHSAP proposes to include White Horse Business Park within the settlement boundary (fig 2). As a result, in addition to being in close proximity to the existing settlement boundary of Trowbridge to the north, the Site also abuts the proposed settlement boundary of Trowbridge - in its extended form - to the east (as defined by the Draft WHSAP, fig 2). The Site therefore relates well to the Trowbridge settlement and in combination with proposed housing allocation 'Elm Grove Farm', would enhance connectivity between the existing Trowbridge settlement and the established White Horse Business Park. Indeed delivery of residential development on the Allocation Site would bridge the separation between the business park and the wider settlement. The potential of the Allocation Site and the adjacent Elm Grove Farm allocation to be successfully integrated into existing and planned developments in the area, while maintaining a defensible buffer to North Bradley is recognised in the Trowbridge Community Area Topic Paper. The relationship between White Horse Business Park, the Proposed Allocation (ref 298) to the SW and proposed allocation 'Elm Grove Farm' (ref 613/248) to the SE is demonstrated in fig 2. The Site is ideally placed to provide improvements to walking and cycling routes through to the town, and the proposed masterplan shows how these improved linkages can be delivered as part of a residential development. The Proposed Allocation would therefore provide a cohesive and logical extension to Trowbridge. It should be noted that the Site would be directly connected to the settlement to the north and east, and would very much look to the north and Trowbridge in terms of connectivity and access to facilities.

**[MAP INSERT] Landscape Evidence and Design Solution** The previous Representations submitted to the Council on behalf of Castlewood in February 2018 provide the Council with an indicative illustrative layout and a Landscape and Visual Appraisal which concludes that there are no significant constraints to the delivery of residential units on the site. The LVA concludes that visually, the Site is relatively well contained on account of the existing hedgerow structure, generally flat topography, the surrounding mature tree belts and surrounding development. The visibility of the site is limited to occasional short distance views from immediate visual receptors. In the wider surrounding landscape, the cumulative effect of field boundary hedgerows and the flat low lying topography provide visual containment. Although, the site is likely to be glimpsed from raised land to the southeast, the intervening distance will prevent its features being discernible. The Site therefore has low visual prominence. There are strong landscape buffers on the edge of North Bradley and the development provides opportunities to reinforce existing landscape features. This will lead to a softening of views towards Trowbridge from North Bradley, especially as the existing settlement edge of Trowbridge is defined by commercial development and the proposed development will provide a softer, more permanent edge. The LVA acknowledges that whilst there would be some physical reduction in the separation between Trowbridge and North Bradley as a result of the Proposed Allocation, the visual effects could be minimised and mitigated. The proposed Masterplan provided in the accompanying Vision Document incorporates such mitigation measures, including:

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<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
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<b>Comment ID:</b>	490	<b>Consultee</b> Castlewood Properties Ventures Ltd	<b>Agent</b> Senior Planner Turley	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1137984	<b>Person ID:</b> 1130975	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC17				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Introduction On behalf of our client, Castlewood Properties Ventures Ltd. (hereafter referred to 'Castlewood'), we write to provide representations to the "Focussed consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan" (WHSAP). We are responding to this consultation in respect of our client's land interest at Land off the A363 at White Horse Business Park Trowbridge, which is proposed allocation H2.2 in the Wiltshire Housing Site Allocations Plan (WHSAP). Castlewood are local developers who can provide greater certainty of delivery, and have a strong track record in delivering development in Wiltshire. We comment specifically in respect of the proposed amendments relating to proposed allocation H2.2, namely PC59 and PC60 and their consequential changes (PC13, PC15, PC17, PC21, PC22, PC25, PC51, PC56). In summary, these proposed amendments seek to reduce the capacity of proposed allocation H2.2 to 'approximately 175 dwellings'. This follows a decision by the Council's Cabinet, relating to perceived coalescence between the proposed allocation site and the village of North Bradley. We consider this in detail in these Representations. These Representations should be viewed alongside the 'Land off the A363 at White Horse Business Park' Vision Document prepared by Tur1ey (November 2018). These Representations should also be read in combination with those from parties who also have an interest in the H2.2 site, on land to the south of Castlewood's parcel.</p> <p>Proposed H2.2 Allocation The Proposed Allocation site H2.2 comprises 18.96ha and extends from Bradley Road at the north to Westbury Road at the south. There are several land interests relating to Proposed Allocation H2.2. Castlewood's interests relate to a 8.37ha parcel at the northern end of the allocation site, closest to the Trowbridge settlement. This northern parcel of land (hereafter referred to 'The Site') is identified in the accompanying Vision Document, The Site fronts onto A363 where the proposed access is to the residential development is to be secured. Trowbridge is a Principal Settlement, situated within the Trowbridge Community Area and located in the North and West Wiltshire Housing Market Area (HMA). Therefore the scope of these representations is focused on the proposed strategy for the North and West Wiltshire HMA, the Trowbridge Community Area and Trowbridge specifically. Previous Representations on behalf of Castlewood were submitted to the Council in September 2017, in response to the WHSAP Pre-Submission consultation, and in February 2018 to provide the Council with an indicative illustrative layout. The following technical reports were all submitted in February 2018 to demonstrate that there are no significant constraints to delivery of residential development in the site: - Baseline Landscape and Visual Appraisal (referred to hereafter as LVA); LVIA Constraints and Opportunities Plan - Flood Risk and Surface Water Drainage Technical Note; - Highways and Transport Technical Note; - Heritage Technical Note; It is not the intention of these Representations to repeat information previously provided, rather to respond to the key changes proposed by this latest consultation. These representations are supported by the following documents, which provide further</p>				

technical information demonstrating the capability of the Proposed Allocation to deliver at least 300 dwellings, of which around 140 dwellings can be provided on the Site: - Land off the A363 at White Horse Business Park Vision Document, prepared by Turley (November 2018) - Ecology Technical Note (November 2018), prepared by Nicholas Pearson Associates. The Ecology Technical Note discusses the ecological considerations which have informed the masterplan, and demonstrates that there are no ecological considerations which do not preclude development of the Site for approximately 140 dwellings, including the need for buffers to be retained as dark corridors. WHSAP Proposed Changes. With respect to the document EXAM0101 Schedule of Proposed Changes (September 2018), the key changes related to the Proposed Allocation are as follows: - PC59 - Amend the boundary of the allocation as set out in Annex C; And first sentence of paragraph 5.52 to read: "Approximately 25.62 18.96 ha of land off the A363 southwest of the White Horse Business Park is allocated for the development" - PC60 - Amend first sentence of paragraph 5.52 as follows: "land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 225 175 dwellings, as identified on the Policies Map." We do wish to object to PC60. This reduction in dwelling numbers is unjustified, and indeed the allocation quantum should be increased to "at least 300 dwellings", based on the technical evidence and other considerations, such as Trowbridge's identified shortfall. The Representation will set out the justification for this. We note that the Council's evidence base has been updated in respect of: - Wiltshire Housing Site Allocations Plan Sustainability Appraisal Revised September 2018 (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C); - Update to the Wiltshire Housing Site Allocations Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03); - Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a); The Community Area Topic Paper Trowbridge has been amended in relation to site ref. 298 (The Proposed Allocation). The amendments are as follows: Whilst this site is not without constraint (including potential effects on protected bat species and the significance of heritage assets), these can be mitigated through on-site measures. To address these matters as a result in any development scheme on the allocation would not involve the whole SHLAA site option but would nonetheless need to deliver all necessary mitigation. Therefore, the potential dwelling capacity stated in the SHLAA/SHELAA would be reduced to approximately 150 175 dwellings (para 5.24, pg 22). This amendment is not supported by the technical information submitted with our previous representations nor the ecology technical note accompanying this Representation. As set out above, the ecological technical note concludes there are no ecological considerations which preclude development of the Site alone for approximately 140 dwellings, including the need for buffers to be retained as dark corridors in respect of the protected bat species. In relation to heritage assets, there are no listed buildings on the Site itself and the Masterplan identifies that appropriate provision can be made for the setting of listed buildings in the vicinity whilst providing c.140 units on the Site, with the remainder of the c.300 units to be provided on the remaining parts of the Proposed Allocation. It should also be noted that the Community Area Topic Paper has also been amended in relation to the immediately adjacent Elm Grove Farm Proposed Allocation. Ecology (protected bat species) and heritage assets are again raised as a potential constraint, however conversely for this site the amendment concludes that these matters can be mitigated through on-site measures and the site's capacity increased. No clear explanation appears to have been provided for the different approach between the sites. It is noted that some of the documents which our previous representations and technical documents commented on, such as the Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 2 (June 2017) (WHSAP/20), have not been updated for the purposes of this consultation. We do not seek to repeat comments previously made in relation to these documents, and would refer you to our previous Representations. In respect of technical considerations we note that the only amendment to the Council's Sustainability Assessment in respect of Proposed Allocation H2.2 (site ref. 298) is in respect of heritage considerations: The Grade II Listed Kings Farmhouse (and its setting), Willow Grove, monuments and gateway to former Baptist Church and Little Common Farm are situated within the site area, and important heritage farmsteads are situated to the north and south of the site. A detailed heritage assessment (building upon the high-level Heritage Impact Assessment prepared by the Council) would be required to support any subsequent planning application. A Heritage Impact Assessment would be required. Archaeological potential of the site is

medium and therefore archaeological assessment would be required (SA Obj. 6). We can confirm that we have no objections to this amended text. It is acknowledged that heritage will be an important consideration for the Proposed Allocation, albeit of less significance to the Site given the location of the Listed Buildings, outwith the Castlewood land interests. Background to Allocation By way of background, the site was submitted to the SHLAA and was assessed under site reference 298. The site passed stage 4a with a stated capacity of 338 dwellings and was progressed as a 'preferred site', however the stated capacity was reduced to 150 dwellings (WHSAP Trowbridge Community Area Topic Paper July 2018, page 18). The assessment of site options (Appendix G) explains this reduction stating "mitigation measures required to address effects on heritage assets, ecology and landscape would result in a reduction to the developable area of the site and a potential reduction in dwelling capacity." (WHSAP Trowbridge Community Area Topic Paper July 2018, page 97). This resulted in the Pre-Submission Draft WHSAP (September 2017) consultation including the site as an allocation for "approximately 150 dwellings" under site reference H2.2. The pre-submission draft was subject to a period of public consultation and subsequent to this consultation, the Council proposed to increase the capacity of the site. This amendment to proposed allocation H2.2 was originally set out in the Council's Cabinet Papers of 15th May 2018, which refer to a capacity increase from approximately 150 to 300 dwellings (Council's Cabinet Papers of 15th May 2018, pages 294, 365). [It is noted that there are inconsistencies in the Council's Cabinet Papers of 15th May 2018, as there is also reference to an increase to 225 dwellings.] This demonstrates that the Council consider that a capacity of approximately 300 dwellings was appropriate for the H2.2 allocation site. The WHSAP was subsequently deferred from consideration at the 15th May 2018 Cabinet meeting to be heard at the 3rd July 2018 Cabinet instead. It is understood this was to allow further consultation on the proposed changes with Wiltshire Councillors and town and parish councils (Minutes of 3rd July 2018 Cabinet, paragraph 257). For the Cabinet Papers of 3rd July 2018, the Council prepared an Addendum following the deferral of the item from Cabinet of 15 May 2018. This Addendum refers to a smaller capacity increase for allocation H2.2 from approximately 150 to 225 dwellings.. At the 3rd July 2018 Cabinet, Cllr Sturgis proposed further changes to the in response to the housing numbers on the Allocation site, understood to be in response to consultation with Wiltshire Councillors and town and parish councils. The following change was proposed: (c) Amend Proposed Change 39 (site allocation H2.2, land off the A363 at White Horse Business Park, Trowbridge) to reduce the proposed dwelling increase by 50 dwellings This proposed change had the effect of reducing the capacity increase further from approximately 150 to 175 dwellings. The minutes of the 3rd July 2018 Cabinet meeting provide further insight into Member's justification for this change: In justifying the further proposed changes, Cllr Sturgis referred to the addendum, and provided clarification as follows ... the reduction in the increase in housing numbers on site H2.2 would provide for landscape buffer for North Bradley. In response to concerns raised by David Feather that insufficient weight had been given to North Bradley's Neighbourhood Plan, Councillor Sturgis stated that other neighbourhood plans were further 'forward, and could therefore be given greater weight. Councillor Sturgis went on to say that: he hoped that the proposed amendments to the White Horse business park site would go some way to maintaining a gap between North Bradley and Trowbridge; and that Wiltshire Council would continue to work to support the North Bradley neighbourhood plan so that it would be better progressed by the time of the examination in public. The issue of alleged coalescence between the Trowbridge and North Bradley settlements is therefore identified to be one of the key issues from the Council's perspective relating to the Proposed Allocation's capacity. It is noted that the Community Area Topic Paper raises concerns regarding ecological (bat species) and heritage constraints, which would require mitigation in order to be satisfactorily addressed. We dispute the Council's concerns regarding the perceived coalescence of Trowbridge and North Bradley, and the limit on capacity created by the ecological and heritage constraints. For the reasons we will set out below we consider the Council's approach to reducing the overall dwelling capacity on site H2.2 to be unsound. The capacity of proposed allocation H2.2 should be reinstated as approximately 300 dwellings, as per the previous view of Planning Officers. Representations We fervently disagree with the Council's position, that the Proposed Allocation is only capable of accommodating approximately 175 dwellings, in order to maintain a gap between the North Bradley and Trowbridge settlements, and provide appropriate mitigation. Our evidence base (and supported by the representations prepared by Linden Homes in relation to a separate parcel of the Allocation Site) supports a higher capacity. Crucially, the Council's own evidence base supports a higher capacity. For example, the WSHAP

Stage 4a Site Landscape Assessment concludes that the capacity of the Site to accommodate change is described as 'moderate-high', This is discussed further below. We feel that the Proposed Allocation is capable of accommodating at least 300 dwellings, without causing issues of coalescence with the North Bradley settlement. Specifically to these Representations, we feel that the Site (the northern parcel of land defined in the accompanying Vision Document) is capable of accommodating approximately 140 dwellings, again without causing issues of coalescence and provide adequate mitigation. This is now considered in full.

**Background on Relationship to Trowbridge** The Site is in close proximity to the existing settlement boundary of Trowbridge to the north (as defined by the Core Strategy 2015, fig 1), less than 50m to the south of the existing boundary. As part of the WHSAP, the Council are undertaking a settlement boundary review (WHSAP Topic Paper 1 Settlement Boundary Review Methodology, refers). This Topic Paper concludes that the White Horse Business Park to the east of the site meets the methodology for being included within the settlement. [MAP INSERT] Accordingly the Draft WHSAP proposes to include White Horse Business Park within the settlement boundary (fig 2). As a result, in addition to being in close proximity to the existing settlement boundary of Trowbridge to the north, the Site also abuts the proposed settlement boundary of Trowbridge - in its extended form - to the east (as defined by the Draft WHSAP, fig 2). The Site therefore relates well to the Trowbridge settlement and in combination with proposed housing allocation 'Elm Grove Farm', would enhance connectivity between the existing Trowbridge settlement and the established White Horse Business Park. Indeed delivery of residential development on the Allocation Site would bridge the separation between the business park and the wider settlement. The potential of the Allocation Site and the adjacent Elm Grove Farm allocation to be successfully integrated into existing and planned developments in the area, while maintaining a defensible buffer to North Bradley is recognised in the Trowbridge Community Area Topic Paper. The relationship between White Horse Business Park, the Proposed Allocation (ref 298) to the SW and proposed allocation 'Elm Grove Farm' (ref 613/248) to the SE is demonstrated in fig 2. The Site is ideally placed to provide improvements to walking and cycling routes through to the town, and the proposed masterplan shows how these improved linkages can be delivered as part of a residential development. The Proposed Allocation would therefore provide a cohesive and logical extension to Trowbridge. It should be noted that the Site would be directly connected to the settlement to the north and east, and would very much look to the north and Trowbridge in terms of connectivity and access to facilities.

**[MAP INSERT] Landscape Evidence and Design Solution** The previous Representations submitted to the Council on behalf of Castlewood in February 2018 provide the Council with an indicative illustrative layout and a Landscape and Visual Appraisal which concludes that there are no significant constraints to the delivery of residential units on the site. The LVA concludes that visually, the Site is relatively well contained on account of the existing hedgerow structure, generally flat topography, the surrounding mature tree belts and surrounding development. The visibility of the site is limited to occasional short distance views from immediate visual receptors. In the wider surrounding landscape, the cumulative effect of field boundary hedgerows and the flat low lying topography provide visual containment. Although, the site is likely to be glimpsed from raised land to the southeast, the intervening distance will prevent its features being discernible. The Site therefore has low visual prominence. There are strong landscape buffers on the edge of North Bradley and the development provides opportunities to reinforce existing landscape features. This will lead to a softening of views towards Trowbridge from North Bradley, especially as the existing settlement edge of Trowbridge is defined by commercial development and the proposed development will provide a softer, more permanent edge. The LVA acknowledges that whilst there would be some physical reduction in the separation between Trowbridge and North Bradley as a result of the Proposed Allocation, the visual effects could be minimised and mitigated. The proposed Masterplan provided in the accompanying Vision Document incorporates such mitigation measures, including:

- The LVA acknowledges that a visual break is experienced between the settlements of Trowbridge and North Bradley when travelling along Woodmarsh. Accordingly the masterplan has not identified development in those areas most significant to the perceived visual separation between North Bradley and Trowbridge, as informed by the LVA. This preserves the setting of North Bradley village and its integrity.
- The northern development parcel is set back considerably from Woodmarsh to reinforce the visual separation from North Bradley and it is proposed that the development in this area will generally be of lower density so as to set the proposed development within a landscape context and that the built form is more visually connected to the south of Trowbridge and visually

buffer the scheme from North Bradley. - The proposed masterplan proposes to implement significant new planting along the south-western boundary, in addition to significant existing planting to reinforce the visual separation between the proposed development and North Bradley. The LVA confirms that the development of the site could be achieved without resulting in significant landscape and/or visual impacts (in relation to the receptors identified in the LVA including the A363, Woodmarsh and residential properties on the eastern edge of North Bradley). In addition, the findings of the Council's own evidence base are significant. The WHSAP Stage 4a Site Landscape Assessment (June 2017) concludes that the overall magnitude of effect on views if the site were to be developed is identified as 'low adverse'. The capacity of Site 298 to accommodate change is described as 'moderate-high'. It is considered, therefore, that the site should be allocated for a much higher number of dwellings given the sustainable location and absence of any constraints which cannot be mitigated against. The overall effect will be to proportionately increase the quantum of market and affordable dwellings, which can be achieved through the Proposed Allocation, whilst simultaneously protecting the integrity of North Bradley as a village. Indeed, the opportunity to achieve a comprehensive design will provide greater opportunities for more meaningful green infrastructure provision, landscaping and open space. In summary, we contend that delivery of approximately 300 dwellings on the Proposed Allocation would not lead to unacceptable coalescence between Trowbridge and North Bradley. Residential development on the site would link, both visually and physically, primarily with Trowbridge and the adjacent White Horse Business Park, which is proposed in the WHSAP to form part of the Trowbridge settlement boundary. As demonstrated in the accompanying Vision Document, development on the site would be sensitively designed with the incorporation of new or strengthened landscape buffers and careful siting of built form to protect visual separation between the two settlements. Utilising the approach set out in the Vision Document, the Site could accommodate c. 140 units, as part of a wider 300 unit allocation.

**Housing Need** As a Principal Settlement, Trowbridge is a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026 and beyond. There are, however, severe constraints to the growth of Trowbridge. In particular, with Green Belt and Flood Zone designations to the north and west of Trowbridge (Fig 3), opportunities to expand Trowbridge in order to accommodate the identified housing need are limited. In proposing the allocation of this site, the Council identified that development of the site for housing would contribute to the area strategy for the town by boosting the supply of homes to help meet indicative requirements" [MAP INSERT] In the context of Trowbridge being a focus for growth and taking a large proportion of housing need, we wish to comment on PC25, which is a factual update to reflect the latest published Housing Land Supply Statement (March 2018) and to reflect PC55, PC60, PC64 and PC70 that propose higher densities on site allocations to make best use of land. PC25 relates to the following amended paragraph: Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 1,050 dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220 1,297."

In addition, related to the Trowbridge Community Area, the Council's Housing Land Supply Statement Addendum July 2018 Submission Version (ref: TOP/03C) indicates there is still an indicative residual requirement for the remainder of the Trowbridge Community Area of at least 2,230 dwellings during the remainder of the Plan period up to 2026. As things stand therefore the Council are not National planning policy is clear that the Council must look at its residential allocations beyond five years to ensure there is a consistent pipeline for bringing forward new residential development. The Council, despite the amendments, acknowledge that housing development at Trowbridge will fall short of the requirements. By failing to allocating sufficient quantum of new housing in the WHSAP, the Council is currently failing to fully meet its identified housing needs. The Plan has not therefore been positively prepared. To ensure a sound Plan, which is consistent with national planning policy, it is essential that either: a) additional site are identified and allocated; or b) greater quantum of housing is allocated on existing/ proposed allocations. In relation to option a), as set out above Trowbridge lacks genuine, alternative options to extend the settlement due to constraints, including Green Belt designations and Flood Zone primarily to the north and west. Consideration should therefore be given to intensify allocations proposed by the WHSAP, where technical constraints do not preclude this. As has been demonstrated by these Representations,

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<b>Identify Proposed Change Reference Number</b>	PC21				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Introduction On behalf of our client, Castlewood Properties Ventures Ltd. (hereafter referred to 'Castlewood'), we write to provide representations to the "Focussed consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan" (WHSAP). We are responding to this consultation in respect of our client's land interest at Land off the A363 at White Horse Business Park Trowbridge, which is proposed allocation H2.2 in the Wiltshire Housing Site Allocations Plan (WHSAP). Castlewood are local developers who can provide greater certainty of delivery, and have a strong track record in delivering development in Wiltshire. We comment specifically in respect of the proposed amendments relating to proposed allocation H2.2, namely PC59 and PC60 and their consequential changes (PC13, PC15, PC17, PC21, PC22, PC25, PC51, PC56). In summary, these proposed amendments seek to reduce the capacity of proposed allocation H2.2 to 'approximately 175 dwellings'. This follows a decision by the Council's Cabinet, relating to perceived coalescence between the proposed allocation site and the village of North Bradley. We consider this in detail in these Representations. These Representations should be viewed alongside the 'Land off the A363 at White Horse Business Park' Vision Document prepared by Tur1ey (November 2018). These Representations should also be read in combination with those from parties who also have an interest in the H2.2 site, on land to the south of Castlewood's parcel.</p> <p>Proposed H2.2 Allocation The Proposed Allocation site H2.2 comprises 18.96ha and extends from Bradley Road at the north to Westbury Road at the south. There are several land interests relating to Proposed Allocation H2.2. Castlewood's interests relate to a 8.37ha parcel at the northern end of the allocation site, closest to the Trowbridge settlement. This northern parcel of land (hereafter referred to 'The Site') is identified in the accompanying Vision Document, The Site fronts onto A363 where the proposed access is to the residential development is to be secured. Trowbridge is a Principal Settlement, situated within the Trowbridge Community Area and located in the North and West Wiltshire Housing Market Area (HMA). Therefore the scope of these representations is focused on the proposed strategy for the North and West Wiltshire HMA, the Trowbridge Community Area and Trowbridge specifically. Previous Representations on behalf of Castlewood were submitted to the Council in September 2017, in response to the WHSAP Pre-Submission consultation, and in February 2018 to provide the Council with an indicative illustrative layout. The following technical reports were all submitted in February 2018 to demonstrate that there are no significant constraints to delivery of residential development in the site: - Baseline Landscape and Visual Appraisal (referred to hereafter as LVA); LVIA Constraints and Opportunities Plan - Flood Risk and Surface Water Drainage Technical Note; - Highways and Transport Technical Note; - Heritage Technical Note; It is not the intention of these Representations to repeat information previously provided, rather to respond to the key changes proposed by this latest consultation. These representations are supported by the following documents, which provide further</p>				

technical information demonstrating the capability of the Proposed Allocation to deliver at least 300 dwellings, of which around 140 dwellings can be provided on the Site: - Land off the A363 at White Horse Business Park Vision Document, prepared by Turley (November 2018) - Ecology Technical Note (November 2018), prepared by Nicholas Pearson Associates. The Ecology Technical Note discusses the ecological considerations which have informed the masterplan, and demonstrates that there are no ecological considerations which do not preclude development of the Site for approximately 140 dwellings, including the need for buffers to be retained as dark corridors. WHSAP Proposed Changes. With respect to the document EXAM0101 Schedule of Proposed Changes (September 2018), the key changes related to the Proposed Allocation are as follows: - PC59 - Amend the boundary of the allocation as set out in Annex C; And first sentence of paragraph 5.52 to read: "Approximately 25.62 18.96 ha of land off the A363 southwest of the White Horse Business Park is allocated for the development" - PC60 - Amend first sentence of paragraph 5.52 as follows: "land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 225 175 dwellings, as identified on the Policies Map." We do wish to object to PC60. This reduction in dwelling numbers is unjustified, and indeed the allocation quantum should be increased to "at least 300 dwellings", based on the technical evidence and other considerations, such as Trowbridge's identified shortfall. The Representation will set out the justification for this. We note that the Council's evidence base has been updated in respect of: - Wiltshire Housing Site Allocations Plan Sustainability Appraisal Revised September 2018 (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C); - Update to the Wiltshire Housing Site Allocations Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03); - Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a); The Community Area Topic Paper Trowbridge has been amended in relation to site ref. 298 (The Proposed Allocation). The amendments are as follows: Whilst this site is not without constraint (including potential effects on protected bat species and the significance of heritage assets), these can be mitigated through on-site measures. To address these matters as a result in any development scheme on the allocation would not involve the whole SHLAA site option but would nonetheless need to deliver all necessary mitigation. Therefore, the potential dwelling capacity stated in the SHLAA/SHELAA would be reduced to approximately 150 175 dwellings (para 5.24, pg 22). This amendment is not supported by the technical information submitted with our previous representations nor the ecology technical note accompanying this Representation. As set out above, the ecological technical note concludes there are no ecological considerations which preclude development of the Site alone for approximately 140 dwellings, including the need for buffers to be retained as dark corridors in respect of the protected bat species. In relation to heritage assets, there are no listed buildings on the Site itself and the Masterplan identifies that appropriate provision can be made for the setting of listed buildings in the vicinity whilst providing c.140 units on the Site, with the remainder of the c.300 units to be provided on the remaining parts of the Proposed Allocation. It should also be noted that the Community Area Topic Paper has also been amended in relation to the immediately adjacent Elm Grove Farm Proposed Allocation. Ecology (protected bat species) and heritage assets are again raised as a potential constraint, however conversely for this site the amendment concludes that these matters can be mitigated through on-site measures and the site's capacity increased. No clear explanation appears to have been provided for the different approach between the sites. It is noted that some of the documents which our previous representations and technical documents commented on, such as the Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 2 (June 2017) (WHSAP/20), have not been updated for the purposes of this consultation. We do not seek to repeat comments previously made in relation to these documents, and would refer you to our previous Representations. In respect of technical considerations we note that the only amendment to the Council's Sustainability Assessment in respect of Proposed Allocation H2.2 (site ref. 298) is in respect of heritage considerations: The Grade II Listed Kings Farmhouse (and its setting), Willow Grove, monuments and gateway to former Baptist Church and Little Common Farm are situated within the site area, and important heritage farmsteads are situated to the north and south of the site. A detailed heritage assessment (building upon the high-level Heritage Impact Assessment prepared by the Council) would be required to support any subsequent planning application. A Heritage Impact Assessment would be required. Archaeological potential of the site is

medium and therefore archaeological assessment would be required (SA Obj. 6). We can confirm that we have no objections to this amended text. It is acknowledged that heritage will be an important consideration for the Proposed Allocation, albeit of less significance to the Site given the location of the Listed Buildings, outwith the Castlewood land interests. Background to Allocation By way of background, the site was submitted to the SHLAA and was assessed under site reference 298. The site passed stage 4a with a stated capacity of 338 dwellings and was progressed as a 'preferred site', however the stated capacity was reduced to 150 dwellings (WHSAP Trowbridge Community Area Topic Paper July 2018, page 18). The assessment of site options (Appendix G) explains this reduction stating "mitigation measures required to address effects on heritage assets, ecology and landscape would result in a reduction to the developable area of the site and a potential reduction in dwelling capacity." (WHSAP Trowbridge Community Area Topic Paper July 2018, page 97). This resulted in the Pre-Submission Draft WHSAP (September 2017) consultation including the site as an allocation for "approximately 150 dwellings" under site reference H2.2. The pre-submission draft was subject to a period of public consultation and subsequent to this consultation, the Council proposed to increase the capacity of the site. This amendment to proposed allocation H2.2 was originally set out in the Council's Cabinet Papers of 15th May 2018, which refer to a capacity increase from approximately 150 to 300 dwellings (Council's Cabinet Papers of 15th May 2018, pages 294, 365). [It is noted that there are inconsistencies in the Council's Cabinet Papers of 15th May 2018, as there is also reference to an increase to 225 dwellings.] This demonstrates that the Council consider that a capacity of approximately 300 dwellings was appropriate for the H2.2 allocation site. The WHSAP was subsequently deferred from consideration at the 15th May 2018 Cabinet meeting to be heard at the 3rd July 2018 Cabinet instead. It is understood this was to allow further consultation on the proposed changes with Wiltshire Councillors and town and parish councils (Minutes of 3rd July 2018 Cabinet, paragraph 257). For the Cabinet Papers of 3rd July 2018, the Council prepared an Addendum following the deferral of the item from Cabinet of 15 May 2018. This Addendum refers to a smaller capacity increase for allocation H2.2 from approximately 150 to 225 dwellings.. At the 3rd July 2018 Cabinet, Cllr Sturgis proposed further changes to the in response to the housing numbers on the Allocation site, understood to be in response to consultation with Wiltshire Councillors and town and parish councils. The following change was proposed: (c) Amend Proposed Change 39 (site allocation H2.2, land off the A363 at White Horse Business Park, Trowbridge) to reduce the proposed dwelling increase by 50 dwellings This proposed change had the effect of reducing the capacity increase further from approximately 150 to 175 dwellings. The minutes of the 3rd July 2018 Cabinet meeting provide further insight into Member's justification for this change: In justifying the further proposed changes, Cllr Sturgis referred to the addendum, and provided clarification as follows ... the reduction in the increase in housing numbers on site H2.2 would provide for landscape buffer for North Bradley. In response to concerns raised by David Feather that insufficient weight had been given to North Bradley's Neighbourhood Plan, Councillor Sturgis stated that other neighbourhood plans were further 'forward, and could therefore be given greater weight. Councillor Sturgis went on to say that: he hoped that the proposed amendments to the White Horse business park site would go some way to maintaining a gap between North Bradley and Trowbridge; and that Wiltshire Council would continue to work to support the North Bradley neighbourhood plan so that it would be better progressed by the time of the examination in public. The issue of alleged coalescence between the Trowbridge and North Bradley settlements is therefore identified to be one of the key issues from the Council's perspective relating to the Proposed Allocation's capacity. It is noted that the Community Area Topic Paper raises concerns regarding ecological (bat species) and heritage constraints, which would require mitigation in order to be satisfactorily addressed. We dispute the Council's concerns regarding the perceived coalescence of Trowbridge and North Bradley, and the limit on capacity created by the ecological and heritage constraints. For the reasons we will set out below we consider the Council's approach to reducing the overall dwelling capacity on site H2.2 to be unsound. The capacity of proposed allocation H2.2 should be reinstated as approximately 300 dwellings, as per the previous view of Planning Officers . Representations We fervently disagree with the Council's position, that the Proposed Allocation is only capable of accommodating approximately 175 dwellings, in order to maintain a gap between the North Bradley and Trowbridge settlements, and provide appropriate mitigation. Our evidence base (and supported by the representations prepared by Linden Homes in relation to a separate parcel of the Allocation Site) supports a higher capacity. Crucially, the Council's own evidence base supports a higher capacity. For example, the WSHAP

Stage 4a Site Landscape Assessment concludes that the capacity of the Site to accommodate change is described as 'moderate-high', This is discussed further below. We feel that the Proposed Allocation is capable of accommodating at least 300 dwellings, without causing issues of coalescence with the North Bradley settlement. Specifically to these Representations, we feel that the Site (the northern parcel of land defined in the accompanying Vision Document) is capable of accommodating approximately 140 dwellings, again without causing issues of coalescence and provide adequate mitigation. This is now considered in full.

**Background on Relationship to Trowbridge** The Site is in close proximity to the existing settlement boundary of Trowbridge to the north (as defined by the Core Strategy 2015, fig 1), less than 50m to the south of the existing boundary. As part of the WHSAP, the Council are undertaking a settlement boundary review (WHSAP Topic Paper 1 Settlement Boundary Review Methodology, refers). This Topic Paper concludes that the White Horse Business Park to the east of the site meets the methodology for being included within the settlement. [MAP INSERT] Accordingly the Draft WHSAP proposes to include White Horse Business Park within the settlement boundary (fig 2). As a result, in addition to being in close proximity to the existing settlement boundary of Trowbridge to the north, the Site also abuts the proposed settlement boundary of Trowbridge - in its extended form - to the east (as defined by the Draft WHSAP, fig 2). The Site therefore relates well to the Trowbridge settlement and in combination with proposed housing allocation 'Elm Grove Farm', would enhance connectivity between the existing Trowbridge settlement and the established White Horse Business Park. Indeed delivery of residential development on the Allocation Site would bridge the separation between the business park and the wider settlement. The potential of the Allocation Site and the adjacent Elm Grove Farm allocation to be successfully integrated into existing and planned developments in the area, while maintaining a defensible buffer to North Bradley is recognised in the Trowbridge Community Area Topic Paper. The relationship between White Horse Business Park, the Proposed Allocation (ref 298) to the SW and proposed allocation 'Elm Grove Farm' (ref 613/248) to the SE is demonstrated in fig 2. The Site is ideally placed to provide improvements to walking and cycling routes through to the town, and the proposed masterplan shows how these improved linkages can be delivered as part of a residential development. The Proposed Allocation would therefore provide a cohesive and logical extension to Trowbridge. It should be noted that the Site would be directly connected to the settlement to the north and east, and would very much look to the north and Trowbridge in terms of connectivity and access to facilities.

**[MAP INSERT] Landscape Evidence and Design Solution** The previous Representations submitted to the Council on behalf of Castlewood in February 2018 provide the Council with an indicative illustrative layout and a Landscape and Visual Appraisal which concludes that there are no significant constraints to the delivery of residential units on the site. The LVA concludes that visually, the Site is relatively well contained on account of the existing hedgerow structure, generally flat topography, the surrounding mature tree belts and surrounding development. The visibility of the site is limited to occasional short distance views from immediate visual receptors. In the wider surrounding landscape, the cumulative effect of field boundary hedgerows and the flat low lying topography provide visual containment. Although, the site is likely to be glimpsed from raised land to the southeast, the intervening distance will prevent its features being discernible. The Site therefore has low visual prominence. There are strong landscape buffers on the edge of North Bradley and the development provides opportunities to reinforce existing landscape features. This will lead to a softening of views towards Trowbridge from North Bradley, especially as the existing settlement edge of Trowbridge is defined by commercial development and the proposed development will provide a softer, more permanent edge. The LVA acknowledges that whilst there would be some physical reduction in the separation between Trowbridge and North Bradley as a result of the Proposed Allocation, the visual effects could be minimised and mitigated. The proposed Masterplan provided in the accompanying Vision Document incorporates such mitigation measures, including:

- The LVA acknowledges that a visual break is experienced between the settlements of Trowbridge and North Bradley when travelling along Woodmarsh. Accordingly the masterplan has not identified development in those areas most significant to the perceived visual separation between North Bradley and Trowbridge, as informed by the LVA. This preserves the setting of North Bradley village and its integrity.
- The northern development parcel is set back considerably from Woodmarsh to reinforce the visual separation from North Bradley and it is proposed that the development in this area will generally be of lower density so as to set the proposed development within a landscape context and that the built form is more visually connected to the south of Trowbridge and visually

buffer the scheme from North Bradley. - The proposed masterplan proposes to implement significant new planting along the south-western boundary, in addition to significant existing planting to reinforce the visual separation between the proposed development and North Bradley. The LVA confirms that the development of the site could be achieved without resulting in significant landscape and/or visual impacts (in relation to the receptors identified in the LVA including the A363, Woodmarsh and residential properties on the eastern edge of North Bradley). In addition, the findings of the Council's own evidence base are significant. The WHSAP Stage 4a Site Landscape Assessment (June 2017) concludes that the overall magnitude of effect on views if the site were to be developed is identified as 'low adverse'. The capacity of Site 298 to accommodate change is described as 'moderate-high'. It is considered, therefore, that the site should be allocated for a much higher number of dwellings given the sustainable location and absence of any constraints which cannot be mitigated against. The overall effect will be to proportionately increase the quantum of market and affordable dwellings, which can be achieved through the Proposed Allocation, whilst simultaneously protecting the integrity of North Bradley as a village. Indeed, the opportunity to achieve a comprehensive design will provide greater opportunities for more meaningful green infrastructure provision, landscaping and open space. In summary, we contend that delivery of approximately 300 dwellings on the Proposed Allocation would not lead to unacceptable coalescence between Trowbridge and North Bradley. Residential development on the site would link, both visually and physically, primarily with Trowbridge and the adjacent White Horse Business Park, which is proposed in the WHSAP to form part of the Trowbridge settlement boundary. As demonstrated in the accompanying Vision Document, development on the site would be sensitively designed with the incorporation of new or strengthened landscape buffers and careful siting of built form to protect visual separation between the two settlements. Utilising the approach set out in the Vision Document, the Site could accommodate c. 140 units, as part of a wider 300 unit allocation.

**Housing Need** As a Principal Settlement, Trowbridge is a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026 and beyond. There are, however, severe constraints to the growth of Trowbridge. In particular, with Green Belt and Flood Zone designations to the north and west of Trowbridge (Fig 3), opportunities to expand Trowbridge in order to accommodate the identified housing need are limited. In proposing the allocation of this site, the Council identified that development of the site for housing would contribute to the area strategy for the town by boosting the supply of homes to help meet indicative requirements" [MAP INSERT] In the context of Trowbridge being a focus for growth and taking a large proportion of housing need, we wish to comment on PC25, which is a factual update to reflect the latest published Housing Land Supply Statement (March 2018) and to reflect PC55, PC60, PC64 and PC70 that propose higher densities on site allocations to make best use of land. PC25 relates to the following amended paragraph: Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 1,050 dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220 1,297."

In addition, related to the Trowbridge Community Area, the Council's Housing Land Supply Statement Addendum July 2018 Submission Version (ref: TOP/03C) indicates there is still an indicative residual requirement for the remainder of the Trowbridge Community Area of at least 2,230 dwellings during the remainder of the Plan period up to 2026. As things stand therefore the Council are not National planning policy is clear that the Council must look at its residential allocations beyond five years to ensure there is a consistent pipeline for bringing forward new residential development. The Council, despite the amendments, acknowledge that housing development at Trowbridge will fall short of the requirements. By failing to allocate sufficient quantum of new housing in the WHSAP, the Council is currently failing to fully meet its identified housing needs. The Plan has not therefore been positively prepared. To ensure a sound Plan, which is consistent with national planning policy, it is essential that either: a) additional sites are identified and allocated; or b) greater quantum of housing is allocated on existing/ proposed allocations. In relation to option a), as set out above Trowbridge lacks genuine, alternative options to extend the settlement due to constraints, including Green Belt designations and Flood Zone primarily to the north and west. Consideration should therefore be given to intensify allocations proposed by the WHSAP, where technical constraints do not preclude this. As has been demonstrated by these Representations,

	<p>and in those previously submitted, there are no technical constraints which preclude a greater quantum of development than currently proposed in the WHSAP. Indeed, the Council have previously identified the potential of this site to accommodate c 300 dwellings, and the proposed reduction to 175 to accommodate ecology and heritage mitigation measures is unjustified. The technical work undertaken, and submitted to the Council during the WHSAP process demonstrate that the Proposed Allocation is capable of accommodating at least 300 dwellings with the incorporation of necessary mitigation measures. The sustainability appraisal undertaken by the Council identify the Proposed Allocation as a 'more sustainable' site. As such, priority should be maximising the housing numbers on this site in the first instance to address the outstanding house requirement, rather than looking towards 'less sustainable sites. Conclusion In summary, it is contended that proposed modification PC60 (and its consequential changes) to the WHSAP render the document unsound and contrary to paragraph 182 of the NPPF (2012). The proposed modification is inconsistent with the technical information provided to the Council, and the Council's own evidence base documents, which recognises the capability of the Proposed Allocation to accommodate a greater quantum of residential units whilst still maintaining appropriate separation between Trowbridge and North Bradley and providing adequate mitigation. The reduction in dwelling numbers for Proposed Allocation H2.2 does not represent positive preparation of the WHSAP. There is an identified housing need in the Trowbridge Community Area and the WHSAP as currently proposed does not meet the full requirement. It is recognised that mitigation will be required in relation to heritage and ecology matters, however the technical work undertaken has identified that appropriate mitigation can be accommodated with a greater quantum of dwellings than 175. Indeed, the accompanying Vision Document relating specially to our client's interests on the north parcel, identifies around 140 dwellings can be appropriately accommodated on that part of the allocation alone. In order to remedy this and make the WHSAP sound, we request that the capacity of the Proposed Allocation H2.2 is reinstated as "at least 300 dwellings", and consequential changes subsequently amended. Specifically to these Representations, we request that recognition is given to the capability of the Site to accommodating approximately 140 dwellings as part of the H2.2 allocation. In order to effectively put this case before the Inspector and address any questions they may have and to also rebuff any argument the Council may make for proceeding with proposed modification PC60 and its consequential changes we consider it necessary to attend the Examination Hearings in a speaking capacity. For reference, we append a full set of additional details as follows. These reports and drawings concern the proposed development of the Site and provide information regarding constraints: Vision Document Ecology Technical Note Flood Risk &amp; Drainage Technical Note Heritage Technical Note Highways Technical Note Landscape and Visual Appraisal</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<p><b>Supporting documents (Please see Objective)</b></p>			

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	492	<b>Consultee</b> Castlewood Properties Ventures Ltd	<b>Agent</b> Senior Planner Turley	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1137984	<b>Person ID:</b> 1130975	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC22				
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**Background to Allocation** By way of background, the site was submitted to the SHLAA and was assessed under site reference 298. The site passed stage 4a with a stated capacity of 338 dwellings and was progressed as a 'preferred site', however the stated capacity was reduced to 150 dwellings (WHSAP Trowbridge Community Area Topic Paper July 2018, page 18). The assessment of site options (Appendix G) explains this reduction stating "mitigation measures required to address effects on heritage assets, ecology and landscape would result in a reduction to the developable area of the site and a potential reduction in dwelling capacity." (WHSAP Trowbridge Community Area Topic Paper July 2018, page 97). This resulted in the Pre-Submission Draft WHSAP (September 2017) consultation including the site as an allocation for "approximately 150 dwellings" under site reference H2.2. The pre-submission draft was subject to a period of public consultation and subsequent to this consultation, the Council proposed to increase the capacity of the site. This amendment to proposed allocation H2.2 was originally set out in the Council's Cabinet Papers of 15th May 2018, which refer to a capacity increase from approximately 150 to 300 dwellings (Council's Cabinet Papers of 15th May 2018, pages 294, 365). [It is noted that there are inconsistencies in the Council's Cabinet Papers of 15th May 2018, as there is also reference to an increase to 225 dwellings.] This demonstrates that the Council consider that a capacity of approximately 300 dwellings was appropriate for the H2.2 allocation site. The WHSAP was subsequently deferred from consideration at the 15th May 2018 Cabinet meeting to be heard at the 3rd July 2018 Cabinet instead. It is understood this was to allow further consultation on the proposed changes with Wiltshire Councillors and town and parish councils (Minutes of 3rd July 2018 Cabinet, paragraph 257). For the Cabinet Papers of 3rd July 2018, the Council prepared an Addendum following the deferral of the item from Cabinet of 15 May 2018. This Addendum refers to a smaller capacity increase for allocation H2.2 from approximately 150 to 225 dwellings.. At the 3rd July 2018 Cabinet, Cllr Sturgis proposed further changes to the in response to the housing numbers on the Allocation site, understood to be in response to consultation with Wiltshire Councillors and town and parish councils. The following change was proposed:

(c) Amend Proposed Change 39 (site allocation H2.2, land off the A363 at White Horse Business Park, Trowbridge) to reduce the proposed dwelling increase by 50 dwellings This proposed change had the effect of reducing the capacity increase further from approximately 150 to 175 dwellings. The minutes of the 3rd July 2018 Cabinet meeting provide further insight into Member's justification for this change: In justifying the further proposed changes, Cllr Sturgis referred to the addendum, and provided clarification as follows ... the reduction in the increase in housing numbers on site H2.2 would provide for landscape buffer for North Bradley. In response to concerns raised by David Feather that insufficient weight had been given to North Bradley's Neighbourhood Plan, Councillor Sturgis stated that other neighbourhood plans were further 'forward, and could therefore be given greater weight. Councillor Sturgis went on to say that: he hoped that the proposed amendments to the White Horse business park site would go some way to maintaining a gap between North Bradley and Trowbridge; and that Wiltshire Council would continue to work to support the North Bradley neighbourhood plan so that it would be better progressed by the time of the examination in public. The issue of alleged coalescence between the Trowbridge and North Bradley settlements is therefore identified to be one of the key issues from the Council's perspective relating to the Proposed Allocation's capacity. It is noted that the Community Area Topic Paper raises concerns regarding ecological (bat species) and heritage constraints, which would require mitigation in order to be satisfactorily addressed. We dispute the Council's concerns regarding the perceived coalescence of Trowbridge and North Bradley, and the limit on capacity created by the ecological and heritage constraints. For the reasons we will set out below we consider the Council's approach to reducing the overall dwelling capacity on site H2.2 to be unsound. The capacity of proposed allocation H2.2 should be reinstated as approximately 300 dwellings, as per the previous view of Planning Officers .

**Representations** We fervently disagree with the Council's position, that the Proposed Allocation is only capable of accommodating approximately 175 dwellings, in order to maintain a gap between the North Bradley and Trowbridge settlements, and provide appropriate mitigation. Our evidence base (and supported by the representations prepared by Linden Homes in relation to a separate parcel of the Allocation Site) supports a higher capacity. Crucially, the Council's own evidence base supports a higher capacity. For example, the WSHAP

Stage 4a Site Landscape Assessment concludes that the capacity of the Site to accommodate change is described as 'moderate-high', This is discussed further below. We feel that the Proposed Allocation is capable of accommodating at least 300 dwellings, without causing issues of coalescence with the North Bradley settlement. Specifically to these Representations, we feel that the Site (the northern parcel of land defined in the accompanying Vision Document) is capable of accommodating approximately 140 dwellings, again without causing issues of coalescence and provide adequate mitigation. This is now considered in full.

**Background on Relationship to Trowbridge** The Site is in close proximity to the existing settlement boundary of Trowbridge to the north (as defined by the Core Strategy 2015, fig 1), less than 50m to the south of the existing boundary. As part of the WHSAP, the Council are undertaking a settlement boundary review (WHSAP Topic Paper 1 Settlement Boundary Review Methodology, refers). This Topic Paper concludes that the White Horse Business Park to the east of the site meets the methodology for being included within the settlement. [MAP INSERT] Accordingly the Draft WHSAP proposes to include White Horse Business Park within the settlement boundary (fig 2). As a result, in addition to being in close proximity to the existing settlement boundary of Trowbridge to the north, the Site also abuts the proposed settlement boundary of Trowbridge - in its extended form - to the east (as defined by the Draft WHSAP, fig 2). The Site therefore relates well to the Trowbridge settlement and in combination with proposed housing allocation 'Elm Grove Farm', would enhance connectivity between the existing Trowbridge settlement and the established White Horse Business Park. Indeed delivery of residential development on the Allocation Site would bridge the separation between the business park and the wider settlement. The potential of the Allocation Site and the adjacent Elm Grove Farm allocation to be successfully integrated into existing and planned developments in the area, while maintaining a defensible buffer to North Bradley is recognised in the Trowbridge Community Area Topic Paper. The relationship between White Horse Business Park, the Proposed Allocation (ref 298) to the SW and proposed allocation 'Elm Grove Farm' (ref 613/248) to the SE is demonstrated in fig 2. The Site is ideally placed to provide improvements to walking and cycling routes through to the town, and the proposed masterplan shows how these improved linkages can be delivered as part of a residential development. The Proposed Allocation would therefore provide a cohesive and logical extension to Trowbridge. It should be noted that the Site would be directly connected to the settlement to the north and east, and would very much look to the north and Trowbridge in terms of connectivity and access to facilities.

**[MAP INSERT] Landscape Evidence and Design Solution** The previous Representations submitted to the Council on behalf of Castlewood in February 2018 provide the Council with an indicative illustrative layout and a Landscape and Visual Appraisal which concludes that there are no significant constraints to the delivery of residential units on the site. The LVA concludes that visually, the Site is relatively well contained on account of the existing hedgerow structure, generally flat topography, the surrounding mature tree belts and surrounding development. The visibility of the site is limited to occasional short distance views from immediate visual receptors. In the wider surrounding landscape, the cumulative effect of field boundary hedgerows and the flat low lying topography provide visual containment. Although, the site is likely to be glimpsed from raised land to the southeast, the intervening distance will prevent its features being discernible. The Site therefore has low visual prominence. There are strong landscape buffers on the edge of North Bradley and the development provides opportunities to reinforce existing landscape features. This will lead to a softening of views towards Trowbridge from North Bradley, especially as the existing settlement edge of Trowbridge is defined by commercial development and the proposed development will provide a softer, more permanent edge. The LVA acknowledges that whilst there would be some physical reduction in the separation between Trowbridge and North Bradley as a result of the Proposed Allocation, the visual effects could be minimised and mitigated. The proposed Masterplan provided in the accompanying Vision Document incorporates such mitigation measures, including:

- The LVA acknowledges that a visual break is experienced between the settlements of Trowbridge and North Bradley when travelling along Woodmarsh. Accordingly the masterplan has not identified development in those areas most significant to the perceived visual separation between North Bradley and Trowbridge, as informed by the LVA. This preserves the setting of North Bradley village and its integrity.
- The northern development parcel is set back considerably from Woodmarsh to reinforce the visual separation from North Bradley and it is proposed that the development in this area will generally be of lower density so as to set the proposed development within a landscape context and that the built form is more visually connected to the south of Trowbridge and visually

buffer the scheme from North Bradley. - The proposed masterplan proposes to implement significant new planting along the south-western boundary, in addition to significant existing planting to reinforce the visual separation between the proposed development and North Bradley. The LVA confirms that the development of the site could be achieved without resulting in significant landscape and/or visual impacts (in relation to the receptors identified in the LVA including the A363, Woodmarsh and residential properties on the eastern edge of North Bradley). In addition, the findings of the Council's own evidence base are significant. The WHSAP Stage 4a Site Landscape Assessment (June 2017) concludes that the overall magnitude of effect on views if the site were to be developed is identified as 'low adverse'. The capacity of Site 298 to accommodate change is described as 'moderate-high'. It is considered, therefore, that the site should be allocated for a much higher number of dwellings given the sustainable location and absence of any constraints which cannot be mitigated against. The overall effect will be to proportionately increase the quantum of market and affordable dwellings, which can be achieved through the Proposed Allocation, whilst simultaneously protecting the integrity of North Bradley as a village. Indeed, the opportunity to achieve a comprehensive design will provide greater opportunities for more meaningful green infrastructure provision, landscaping and open space. In summary, we contend that delivery of approximately 300 dwellings on the Proposed Allocation would not lead to unacceptable coalescence between Trowbridge and North Bradley. Residential development on the site would link, both visually and physically, primarily with Trowbridge and the adjacent White Horse Business Park, which is proposed in the WHSAP to form part of the Trowbridge settlement boundary. As demonstrated in the accompanying Vision Document, development on the site would be sensitively designed with the incorporation of new or strengthened landscape buffers and careful siting of built form to protect visual separation between the two settlements. Utilising the approach set out in the Vision Document, the Site could accommodate c. 140 units, as part of a wider 300 unit allocation.

**Housing Need** As a Principal Settlement, Trowbridge is a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026 and beyond. There are, however, severe constraints to the growth of Trowbridge. In particular, with Green Belt and Flood Zone designations to the north and west of Trowbridge (Fig 3), opportunities to expand Trowbridge in order to accommodate the identified housing need are limited. In proposing the allocation of this site, the Council identified that development of the site for housing would contribute to the area strategy for the town by boosting the supply of homes to help meet indicative requirements" [MAP INSERT] In the context of Trowbridge being a focus for growth and taking a large proportion of housing need, we wish to comment on PC25, which is a factual update to reflect the latest published Housing Land Supply Statement (March 2018) and to reflect PC55, PC60, PC64 and PC70 that propose higher densities on site allocations to make best use of land. PC25 relates to the following amended paragraph: Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 1,050 dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220 1,297."

In addition, related to the Trowbridge Community Area, the Council's Housing Land Supply Statement Addendum July 2018 Submission Version (ref: TOP/03C) indicates there is still an indicative residual requirement for the remainder of the Trowbridge Community Area of at least 2,230 dwellings during the remainder of the Plan period up to 2026. As things stand therefore the Council are not National planning policy is clear that the Council must look at its residential allocations beyond five years to ensure there is a consistent pipeline for bringing forward new residential development. The Council, despite the amendments, acknowledge that housing development at Trowbridge will fall short of the requirements. By failing to allocating sufficient quantum of new housing in the WHSAP, the Council is currently failing to fully meet its identified housing needs. The Plan has not therefore been positively prepared. To ensure a sound Plan, which is consistent with national planning policy, it is essential that either: a) additional site are identified and allocated; or b) greater quantum of housing is allocated on existing/ proposed allocations. In relation to option a), as set out above Trowbridge lacks genuine, alternative options to extend the settlement due to constraints, including Green Belt designations and Flood Zone primarily to the north and west. Consideration should therefore be given to intensify allocations proposed by the WHSAP, where technical constraints do not preclude this. As has been demonstrated by these Representations,

	<p>and in those previously submitted, there are no technical constraints which preclude a greater quantum of development than currently proposed in the WHSAP. Indeed, the Council have previously identified the potential of this site to accommodate c 300 dwellings, and the proposed reduction to 175 to accommodate ecology and heritage mitigation measures is unjustified. The technical work undertaken, and submitted to the Council during the WHSAP process demonstrate that the Proposed Allocation is capable of accommodating at least 300 dwellings with the incorporation of necessary mitigation measures. The sustainability appraisal undertaken by the Council identify the Proposed Allocation as a 'more sustainable' site. As such, priority should be maximising the housing numbers on this site in the first instance to address the outstanding house requirement, rather than looking towards 'less sustainable sites. Conclusion In summary, it is contended that proposed modification PC60 (and its consequential changes) to the WHSAP render the document unsound and contrary to paragraph 182 of the NPPF (2012). The proposed modification is inconsistent with the technical information provided to the Council, and the Council's own evidence base documents, which recognises the capability of the Proposed Allocation to accommodate a greater quantum of residential units whilst still maintaining appropriate separation between Trowbridge and North Bradley and providing adequate mitigation. The reduction in dwelling numbers for Proposed Allocation H2.2 does not represent positive preparation of the WHSAP. There is an identified housing need in the Trowbridge Community Area and the WHSAP as currently proposed does not meet the full requirement. It is recognised that mitigation will be required in relation to heritage and ecology matters, however the technical work undertaken has identified that appropriate mitigation can be accommodated with a greater quantum of dwellings than 175. Indeed, the accompanying Vision Document relating specially to our client's interests on the north parcel, identifies around 140 dwellings can be appropriately accommodated on that part of the allocation alone. In order to remedy this and make the WHSAP sound, we request that the capacity of the Proposed Allocation H2.2 is reinstated as "at least 300 dwellings", and consequential changes subsequently amended. Specifically to these Representations, we request that recognition is given to the capability of the Site to accommodating approximately 140 dwellings as part of the H2.2 allocation. In order to effectively put this case before the Inspector and address any questions they may have and to also rebuff any argument the Council may make for proceeding with proposed modification PC60 and its consequential changes we consider it necessary to attend the Examination Hearings in a speaking capacity. For reference, we append a full set of additional details as follows. These reports and drawings concern the proposed development of the Site and provide information regarding constraints: Vision Document Ecology Technical Note Flood Risk &amp; Drainage Technical Note Heritage Technical Note Highways Technical Note Landscape and Visual Appraisal</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	493	<b>Consultee</b> Castlewood Properties Ventures Ltd	<b>Agent</b> Senior Planner Turley	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1137984	<b>Person ID:</b> 1130975	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC59				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Introduction On behalf of our client, Castlewood Properties Ventures Ltd. (hereafter referred to 'Castlewood'), we write to provide representations to the "Focussed consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan" (WHSAP). We are responding to this consultation in respect of our client's land interest at Land off the A363 at White Horse Business Park Trowbridge, which is proposed allocation H2.2 in the Wiltshire Housing Site Allocations Plan (WHSAP). Castlewood are local developers who can provide greater certainty of delivery, and have a strong track record in delivering development in Wiltshire. We comment specifically in respect of the proposed amendments relating to proposed allocation H2.2, namely PC59 and PC60 and their consequential changes (PC13, PC15, PC17, PC21, PC22, PC25, PC51, PC56). In summary, these proposed amendments seek to reduce the capacity of proposed allocation H2.2 to 'approximately 175 dwellings'. This follows a decision by the Council's Cabinet, relating to perceived coalescence between the proposed allocation site and the village of North Bradley. We consider this in detail in these Representations. These Representations should be viewed alongside the 'Land off the A363 at White Horse Business Park' Vision Document prepared by Tur1ey (November 2018). These Representations should also be read in combination with those from parties who also have an interest in the H2.2 site, on land to the south of Castlewood's parcel.</p> <p>Proposed H2.2 Allocation The Proposed Allocation site H2.2 comprises 18.96ha and extends from Bradley Road at the north to Westbury Road at the south. There are several land interests relating to Proposed Allocation H2.2. Castlewood's interests relate to a 8.37ha parcel at the northern end of the allocation site, closest to the Trowbridge settlement. This northern parcel of land (hereafter referred to 'The Site') is identified in the accompanying Vision Document, The Site fronts onto A363 where the proposed access is to the residential development is to be secured. Trowbridge is a Principal Settlement, situated within the Trowbridge Community Area and located in the North and West Wiltshire Housing Market Area (HMA). Therefore the scope of these representations is focused on the proposed strategy for the North and West Wiltshire HMA, the Trowbridge Community Area and Trowbridge specifically. Previous Representations on behalf of Castlewood were submitted to the Council in September 2017, in response to the WHSAP Pre-Submission consultation, and in February 2018 to provide the Council with an indicative illustrative layout. The following technical reports were all submitted in February 2018 to demonstrate that there are no significant constraints to delivery of residential development in the site: - Baseline Landscape and Visual Appraisal (referred to hereafter as LVA); LVIA Constraints and Opportunities Plan - Flood Risk and Surface Water Drainage Technical Note; - Highways and Transport Technical Note; - Heritage Technical Note; It is not the intention of these Representations to repeat information previously provided, rather to respond to the key changes proposed by this latest consultation. These representations are supported by the following documents, which provide further</p>				

technical information demonstrating the capability of the Proposed Allocation to deliver at least 300 dwellings, of which around 140 dwellings can be provided on the Site: - Land off the A363 at White Horse Business Park Vision Document, prepared by Turley (November 2018) - Ecology Technical Note (November 2018), prepared by Nicholas Pearson Associates. The Ecology Technical Note discusses the ecological considerations which have informed the masterplan, and demonstrates that there are no ecological considerations which do not preclude development of the Site for approximately 140 dwellings, including the need for buffers to be retained as dark corridors. WHSAP Proposed Changes. With respect to the document EXAM0101 Schedule of Proposed Changes (September 2018), the key changes related to the Proposed Allocation are as follows: - PC59 - Amend the boundary of the allocation as set out in Annex C; And first sentence of paragraph 5.52 to read: "Approximately 25.62 18.96 ha of land off the A363 southwest of the White Horse Business Park is allocated for the development" - PC60 - Amend first sentence of paragraph 5.52 as follows: "land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 225 175 dwellings, as identified on the Policies Map." We do wish to object to PC60. This reduction in dwelling numbers is unjustified, and indeed the allocation quantum should be increased to "at least 300 dwellings", based on the technical evidence and other considerations, such as Trowbridge's identified shortfall. The Representation will set out the justification for this. We note that the Council's evidence base has been updated in respect of: - Wiltshire Housing Site Allocations Plan Sustainability Appraisal Revised September 2018 (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C); - Update to the Wiltshire Housing Site Allocations Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03); - Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a); The Community Area Topic Paper Trowbridge has been amended in relation to site ref. 298 (The Proposed Allocation). The amendments are as follows: Whilst this site is not without constraint (including potential effects on protected bat species and the significance of heritage assets), these can be mitigated through on-site measures. To address these matters as a result in any development scheme on the allocation would not involve the whole SHLAA site option but would nonetheless need to deliver all necessary mitigation. Therefore, the potential dwelling capacity stated in the SHLAA/SHELAA would be reduced to approximately 150 175 dwellings (para 5.24, pg 22). This amendment is not supported by the technical information submitted with our previous representations nor the ecology technical note accompanying this Representation. As set out above, the ecological technical note concludes there are no ecological considerations which preclude development of the Site alone for approximately 140 dwellings, including the need for buffers to be retained as dark corridors in respect of the protected bat species. In relation to heritage assets, there are no listed buildings on the Site itself and the Masterplan identifies that appropriate provision can be made for the setting of listed buildings in the vicinity whilst providing c.140 units on the Site, with the remainder of the c.300 units to be provided on the remaining parts of the Proposed Allocation. It should also be noted that the Community Area Topic Paper has also been amended in relation to the immediately adjacent Elm Grove Farm Proposed Allocation. Ecology (protected bat species) and heritage assets are again raised as a potential constraint, however conversely for this site the amendment concludes that these matters can be mitigated through on-site measures and the site's capacity increased. No clear explanation appears to have been provided for the different approach between the sites. It is noted that some of the documents which our previous representations and technical documents commented on, such as the Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 2 (June 2017) (WHSAP/20), have not been updated for the purposes of this consultation. We do not seek to repeat comments previously made in relation to these documents, and would refer you to our previous Representations. In respect of technical considerations we note that the only amendment to the Council's Sustainability Assessment in respect of Proposed Allocation H2.2 (site ref. 298) is in respect of heritage considerations: The Grade II Listed Kings Farmhouse (and its setting), Willow Grove, monuments and gateway to former Baptist Church and Little Common Farm are situated within the site area, and important heritage farmsteads are situated to the north and south of the site. A detailed heritage assessment (building upon the high-level Heritage Impact Assessment prepared by the Council) would be required to support any subsequent planning application. A Heritage Impact Assessment would be required. Archaeological potential of the site is medium and therefore archaeological assessment would be required (SA



Obj. 6). We can confirm that we have no objections to this amended text. It is acknowledged that heritage will be an important consideration for the Proposed Allocation, albeit of less significance to the Site given the location of the Listed Buildings, outwith the Castlewood land interests.

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**Background on Relationship to Trowbridge** The Site is in close proximity to the existing settlement boundary of Trowbridge to the north (as defined by the Core Strategy 2015, fig 1), less than 50m to the south of the existing boundary. As part of the WHSAP, the Council are undertaking a settlement boundary review (WHSAP Topic Paper 1 Settlement Boundary Review Methodology, refers). This Topic Paper concludes that the White Horse Business Park to the east of the site meets the methodology for being included within the settlement. [MAP INSERT] Accordingly the Draft WHSAP proposes to include White Horse Business Park within the settlement boundary (fig 2). As a result, in addition to being in close proximity to the existing settlement boundary of Trowbridge to the north, the Site also abuts the proposed settlement boundary of Trowbridge - in its extended form - to the east (as defined by the Draft WHSAP, fig 2). The Site therefore relates well to the Trowbridge settlement and in combination with proposed housing allocation 'Elm Grove Farm', would enhance connectivity between the existing Trowbridge settlement and the established White Horse Business Park. Indeed delivery of residential development on the Allocation Site would bridge the separation between the business park and the wider settlement. The potential of the Allocation Site and the adjacent Elm Grove Farm allocation to be successfully integrated into existing and planned developments in the area, while maintaining a defensible buffer to North Bradley is recognised in the Trowbridge Community Area Topic Paper. The relationship between White Horse Business Park, the Proposed Allocation (ref 298) to the SW and proposed allocation 'Elm Grove Farm' (ref 613/248) to the SE is demonstrated in fig 2. The Site is ideally placed to provide improvements to walking and cycling routes through to the town, and the proposed masterplan shows how these improved linkages can be delivered as part of a residential development. The Proposed Allocation would therefore provide a cohesive and logical extension to Trowbridge. It should be noted that the Site would be directly connected to the settlement to the north and east, and would very much look to the north and Trowbridge in terms of connectivity and access to facilities. [MAP INSERT]

**Landscape Evidence and Design Solution** The previous Representations submitted to the Council on behalf of Castlewood in February 2018 provide the Council with an indicative illustrative layout and a Landscape and Visual Appraisal which concludes that there are no significant constraints to the delivery of residential units on the site. The LVA concludes that visually, the Site is relatively well contained on account of the existing hedgerow structure, generally flat topography, the surrounding mature tree belts and surrounding development. The visibility of the site is limited to occasional short distance views from immediate visual receptors. In the wider surrounding landscape, the cumulative effect of field boundary hedgerows and the flat low lying topography provide visual containment. Although, the site is likely to be glimpsed from raised land to the southeast, the intervening distance will prevent its features being discernible. The Site therefore has low visual prominence. There are strong landscape buffers on the edge of North Bradley and the development provides opportunities to reinforce existing landscape features. This will lead to a softening of views towards Trowbridge from North Bradley, especially as the existing settlement edge of Trowbridge is defined by commercial development and the proposed development will provide a softer, more permanent edge. The LVA acknowledges that whilst there would be some physical reduction in the separation between Trowbridge and North Bradley as a result of the Proposed Allocation, the visual effects could be minimised and mitigated. The proposed Masterplan provided in the accompanying Vision Document incorporates such mitigation measures, including:

- The LVA acknowledges that a visual break is experienced between the settlements of Trowbridge and North Bradley when travelling along Woodmarsh. Accordingly the masterplan has not identified development in those areas most significant to the perceived visual separation between North Bradley and Trowbridge, as informed by the LVA. This preserves the setting of North Bradley village and its integrity.
- The northern development parcel is set back considerably from Woodmarsh to reinforce the visual separation from North Bradley and it is proposed that the development in this area will generally be of lower density so as to set the proposed development within a landscape context and that the built form is more visually connected to the south of Trowbridge and visually buffer the scheme from North Bradley.
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masterplan proposes to implement significant new planting along the south-western boundary, in addition to significant existing planting to reinforce the visual separation between the proposed development and North Bradley. The LVA confirms that the development of the site could be achieved without resulting in significant landscape and/or visual impacts (in relation to the receptors identified in the LVA including the A363, Woodmarsh and residential properties on the eastern edge of North Bradley). In addition, the findings of the Council's own evidence base are significant. The WHSAP Stage 4a Site Landscape Assessment (June 2017) concludes that the overall magnitude of effect on views if the site were to be developed is identified as 'low adverse'. The capacity of Site 298 to accommodate change is described as 'moderate-high'. It is considered, therefore, that the site should be allocated for a much higher number of dwellings given the sustainable location and absence of any constraints which cannot be mitigated against. The overall effect will be to proportionately increase the quantum of market and affordable dwellings, which can be achieved through the Proposed Allocation, whilst simultaneously protecting the integrity of North Bradley as a village. Indeed, the opportunity to achieve a comprehensive design will provide greater opportunities for more meaningful green infrastructure provision, landscaping and open space. In summary, we contend that delivery of approximately 300 dwellings on the Proposed Allocation would not lead to unacceptable coalescence between Trowbridge and North Bradley. Residential development on the site would link, both visually and physically, primarily with Trowbridge and the adjacent White Horse Business Park, which is proposed in the WHSAP to form part of the Trowbridge settlement boundary. As demonstrated in the accompanying Vision Document, development on the site would be sensitively designed with the incorporation of new or strengthened landscape buffers and careful siting of built form to protect visual separation between the two settlements. Utilising the approach set out in the Vision Document, the Site could accommodate c. 140 units, as part of a wider 300 unit allocation.

**Housing Need** As a Principal Settlement, Trowbridge is a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026 and beyond. There are, however, severe constraints to the growth of Trowbridge. In particular, with Green Belt and Flood Zone designations to the north and west of Trowbridge (Fig 3), opportunities to expand Trowbridge in order to accommodate the identified housing need are limited. In proposing the allocation of this site, the Council identified that "development of the site for housing would contribute to the area strategy for the town by boosting the supply of homes to help meet indicative requirements" [MAP INSERT] In the context of Trowbridge being a focus for growth and taking a large proportion of housing need, we wish to comment on PC25, which is a factual update to reflect the latest published Housing Land Supply Statement (March 2018) and to reflect PCSS, PC60, PC64 and PC70 that propose higher densities on site allocations to make best use of land. PC25 relates to the following amended paragraph: "Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 1,050 dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220 1,297 ." In addition, related to the Trowbridge Community Area, the Council's Housing Land Supply Statement Addendum July 2018 Submission Version (ref: TOP/03C) indicates there is still an indicative residual requirement for the remainder of the Trowbridge Community Area of at least 2,230 dwellings during the remainder of the Plan period up to 2026. As things stand therefore the Council are not

National planning policy is clear that the Council must look at its residential allocations beyond five years to ensure there is a consistent pipeline for bringing forward new residential development. The Council, despite the amendments, acknowledge that housing development at Trowbridge will fall short of the requirements. By failing to allocate sufficient quantum of new housing in the WHSAP, the Council is currently failing to fully meet its identified housing needs. The Plan has not therefore been positively prepared. To ensure a sound Plan, which is consistent with national planning policy, it is essential that either: a) additional sites are identified and allocated; or b) greater quantum of housing is allocated on existing/ proposed allocations. In relation to option a), as set out above Trowbridge lacks genuine, alternative options to extend the settlement due to constraints, including Green Belt designations and Flood Zone primarily to the north and west. Consideration should therefore be given to intensify allocations proposed by the WHSAP, where technical constraints do not preclude this. As has been demonstrated by these Representations, and in those previously submitted, there are no technical constraints which preclude a

	<p>greater quantum of development than currently proposed in the WHSAP. Indeed, the Council have previously identified the potential of this site to accommodate c 300 dwellings, and the proposed reduction to 175 to accommodate ecology and heritage mitigation measures is unjustified. The technical work undertaken, and submitted to the Council during the WHSAP process demonstrate that the Proposed Allocation is capable of accommodating at least 300 dwellings with the incorporation of necessary mitigation measures. The sustainability appraisal undertaken by the Council identify the Proposed Allocation as a 'more sustainable' site. As such, priority should be maximising the housing numbers on this site in the first instance to address the outstanding house requirement, rather than looking towards 'less sustainable sites. Conclusion In summary, it is contended that proposed modification PC60 (and its consequential changes) to the WHSAP render the document unsound and contrary to paragraph 182 of the NPPF (2012). The proposed modification is inconsistent with the technical information provided to the Council, and the Council's own evidence base documents, with recognises the capability of the Proposed Allocation to accommodate a greater quantum of residential units whilst still maintaining appropriate separation between Trowbridge and North Bradley and providing adequate mitigation. The reduction in dwelling numbers for Proposed Allocation H2.2 does not represent positive preparation of the WHSAP. There is an identified housing need in the Trowbridge Community Area and the WHSAP as currently proposed does not meet the full requirement. It is recognised that mitigation will be required in relation to heritage and ecology matters, however the technical work undertaken has identified that appropriate mitigation can be accommodated with a greater quantum of dwellings than 175. Indeed, the accompanying Vision Document relating specially to our client's interests on the north parcel, identifies around 140 dwellings can be appropriately accommodated on that part of the allocation alone. In order to remedy this and make the WHSAP sound, we request that the capacity of the Proposed Allocation H2.2 is reinstated as "at least 300 dwellings", and consequential changes subsequently amended. Specifically to these Representations, we request that recognition is given to the capability of the Site to accommodating approximately 140 dwellings as part of the H2.2 allocation. In order to effectively put this case before the Inspector and address any questions they may have and to also rebuff any argument the Council may make for proceeding with proposed modification PC60 and its consequential changes we consider it necessary to attend the Examination Hearings in a speaking capacity. For reference, we append a full set of additional details as follows. These reports and drawings concern the proposed development of the Site and provide information regarding constraints: Vision Document Ecology Technical Note Flood Risk &amp; Drainage Technical Note Heritage Technical Note Highways Technical Note Landscape and Visual Appraisal</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	5153612		
<p><b>Does your representation relate to a previous one</b></p>	No, the Proposed Change does not meet a previous objection		

<p><b>you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	494	<b>Consultee</b> Castlewood Properties Ventures Ltd	<b>Agent</b> Senior Planner Turley	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1137984	<b>Person ID:</b> 1130975	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC25				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Introduction On behalf of our client, Castlewood Properties Ventures Ltd. (hereafter referred to 'Castlewood'), we write to provide representations to the "Focussed consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan" (WHSAP). We are responding to this consultation in respect of our client's land interest at Land off the A363 at White Horse Business Park Trowbridge, which is proposed allocation H2.2 in the Wiltshire Housing Site Allocations Plan (WHSAP). Castlewood are local developers who can provide greater certainty of delivery, and have a strong track record in delivering development in Wiltshire. We comment specifically in respect of the proposed amendments relating to proposed allocation H2.2, namely PC59 and PC60 and their consequential changes (PC13, PC15, PC17, PC21, PC22, PC25, PC51, PC56). In summary, these proposed amendments seek to reduce the capacity of proposed allocation H2.2 to 'approximately 175 dwellings'. This follows a decision by the Council's Cabinet, relating to perceived coalescence between the proposed allocation site and the village of North Bradley. We consider this in detail in these Representations. These Representations should be viewed alongside the 'Land off the A363 at White Horse Business Park' Vision Document prepared by Tur1ey (November 2018). These Representations should also be read in combination with those from parties who also have an interest in the H2.2 site, on land to the south of Castlewood's parcel.</p> <p>Proposed H2.2 Allocation The Proposed Allocation site H2.2 comprises 18.96ha and extends from Bradley Road at the north to Westbury Road at the south. There are several land interests relating to Proposed Allocation H2.2. Castlewood's interests relate to a 8.37ha parcel at the northern end of the allocation site, closest to the Trowbridge settlement. This northern parcel of land (hereafter referred to 'The Site') is identified in the accompanying Vision Document, The Site fronts onto A363 where the proposed access is to the residential development is to be secured. Trowbridge is a Principal Settlement, situated within the Trowbridge Community Area and located in the North and West Wiltshire Housing Market Area (HMA). Therefore the scope of these representations is focused on the proposed strategy for the North and West Wiltshire HMA, the Trowbridge Community Area and Trowbridge specifically. Previous Representations on behalf of Castlewood were submitted to the Council in September 2017, in response to the WHSAP Pre-Submission consultation, and in February 2018 to provide the Council with an indicative illustrative layout. The following technical reports were all submitted in February 2018 to demonstrate that there are no significant constraints to delivery of residential development in the site: - Baseline Landscape and Visual Appraisal (referred to hereafter as LVA); LVIA Constraints and Opportunities Plan - Flood Risk and Surface Water Drainage Technical Note; - Highways and Transport Technical Note; - Heritage Technical Note; It is not the intention of these Representations to repeat information previously provided, rather to respond to the key changes proposed by this latest consultation. These representations are supported by the following documents, which provide further</p>				

technical information demonstrating the capability of the Proposed Allocation to deliver at least 300 dwellings, of which around 140 dwellings can be provided on the Site: - Land off the A363 at White Horse Business Park Vision Document, prepared by Turley (November 2018) - Ecology Technical Note (November 2018), prepared by Nicholas Pearson Associates. The Ecology Technical Note discusses the ecological considerations which have informed the masterplan, and demonstrates that there are no ecological considerations which do not preclude development of the Site for approximately 140 dwellings, including the need for buffers to be retained as dark corridors. WHSAP Proposed Changes. With respect to the document EXAM0101 Schedule of Proposed Changes (September 2018), the key changes related to the Proposed Allocation are as follows: - PC59 - Amend the boundary of the allocation as set out in Annex C; And first sentence of paragraph 5.52 to read: "Approximately 25.62 18.96 ha of land off the A363 southwest of the White Horse Business Park is allocated for the development" - PC60 - Amend first sentence of paragraph 5.52 as follows: "land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 225 175 dwellings, as identified on the Policies Map." We do wish to object to PC60. This reduction in dwelling numbers is unjustified, and indeed the allocation quantum should be increased to "at least 300 dwellings", based on the technical evidence and other considerations, such as Trowbridge's identified shortfall. The Representation will set out the justification for this. We note that the Council's evidence base has been updated in respect of: - Wiltshire Housing Site Allocations Plan Sustainability Appraisal Revised September 2018 (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C); - Update to the Wiltshire Housing Site Allocations Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03); - Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a); The Community Area Topic Paper Trowbridge has been amended in relation to site ref. 298 (The Proposed Allocation). The amendments are as follows: Whilst this site is not without constraint (including potential effects on protected bat species and the significance of heritage assets), these can be mitigated through on-site measures. To address these matters as a result in any development scheme on the allocation would not involve the whole SHLAA site option but would nonetheless need to deliver all necessary mitigation. Therefore, the potential dwelling capacity stated in the SHLAA/SHELAA would be reduced to approximately 150 175 dwellings (para 5.24, pg 22). This amendment is not supported by the technical information submitted with our previous representations nor the ecology technical note accompanying this Representation. As set out above, the ecological technical note concludes there are no ecological considerations which preclude development of the Site alone for approximately 140 dwellings, including the need for buffers to be retained as dark corridors in respect of the protected bat species. In relation to heritage assets, there are no listed buildings on the Site itself and the Masterplan identifies that appropriate provision can be made for the setting of listed buildings in the vicinity whilst providing c.140 units on the Site, with the remainder of the c.300 units to be provided on the remaining parts of the Proposed Allocation. It should also be noted that the Community Area Topic Paper has also been amended in relation to the immediately adjacent Elm Grove Farm Proposed Allocation. Ecology (protected bat species) and heritage assets are again raised as a potential constraint, however conversely for this site the amendment concludes that these matters can be mitigated through on-site measures and the site's capacity increased. No clear explanation appears to have been provided for the different approach between the sites. It is noted that some of the documents which our previous representations and technical documents commented on, such as the Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 2 (June 2017) (WHSAP/20), have not been updated for the purposes of this consultation. We do not seek to repeat comments previously made in relation to these documents, and would refer you to our previous Representations. In respect of technical considerations we note that the only amendment to the Council's Sustainability Assessment in respect of Proposed Allocation H2.2 (site ref. 298) is in respect of heritage considerations: The Grade II Listed Kings Farmhouse (and its setting), Willow Grove, monuments and gateway to former Baptist Church and Little Common Farm are situated within the site area, and important heritage farmsteads are situated to the north and south of the site. A detailed heritage assessment (building upon the high-level Heritage Impact Assessment prepared by the Council) would be required to support any subsequent planning application. A Heritage Impact Assessment would be required. Archaeological potential of the site is

medium and therefore archaeological assessment would be required (SA Obj. 6). We can confirm that we have no objections to this amended text. It is acknowledged that heritage will be an important consideration for the Proposed Allocation, albeit of less significance to the Site given the location of the Listed Buildings, outwith the Castlewood land interests.

**Background to Allocation** By way of background, the site was submitted to the SHLAA and was assessed under site reference 298. The site passed stage 4a with a stated capacity of 338 dwellings and was progressed as a 'preferred site', however the stated capacity was reduced to 150 dwellings (WHSAP Trowbridge Community Area Topic Paper July 2018, page 18). The assessment of site options (Appendix G) explains this reduction stating "mitigation measures required to address effects on heritage assets, ecology and landscape would result in a reduction to the developable area of the site and a potential reduction in dwelling capacity." (WHSAP Trowbridge Community Area Topic Paper July 2018, page 97). This resulted in the Pre-Submission Draft WHSAP (September 2017) consultation including the site as an allocation for "approximately 150 dwellings" under site reference H2.2. The pre-submission draft was subject to a period of public consultation and subsequent to this consultation, the Council proposed to increase the capacity of the site. This amendment to proposed allocation H2.2 was originally set out in the Council's Cabinet Papers of 15th May 2018, which refer to a capacity increase from approximately 150 to 300 dwellings (Council's Cabinet Papers of 15th May 2018, pages 294, 365). [It is noted that there are inconsistencies in the Council's Cabinet Papers of 15th May 2018, as there is also reference to an increase to 225 dwellings.] This demonstrates that the Council consider that a capacity of approximately 300 dwellings was appropriate for the H2.2 allocation site. The WHSAP was subsequently deferred from consideration at the 15th May 2018 Cabinet meeting to be heard at the 3rd July 2018 Cabinet instead. It is understood this was to allow further consultation on the proposed changes with Wiltshire Councillors and town and parish councils (Minutes of 3rd July 2018 Cabinet, paragraph 257). For the Cabinet Papers of 3rd July 2018, the Council prepared an Addendum following the deferral of the item from Cabinet of 15 May 2018. This Addendum refers to a smaller capacity increase for allocation H2.2 from approximately 150 to 225 dwellings.. At the 3rd July 2018 Cabinet, Cllr Sturgis proposed further changes to the in response to the housing numbers on the Allocation site, understood to be in response to consultation with Wiltshire Councillors and town and parish councils. The following change was proposed:

(c) Amend Proposed Change 39 (site allocation H2.2, land off the A363 at White Horse Business Park, Trowbridge) to reduce the proposed dwelling increase by 50 dwellings This proposed change had the effect of reducing the capacity increase further from approximately 150 to 175 dwellings. The minutes of the 3rd July 2018 Cabinet meeting provide further insight into Member's justification for this change: In justifying the further proposed changes, Cllr Sturgis referred to the addendum, and provided clarification as follows ... the reduction in the increase in housing numbers on site H2.2 would provide for landscape buffer for North Bradley. In response to concerns raised by David Feather that insufficient weight had been given to North Bradley's Neighbourhood Plan, Councillor Sturgis stated that other neighbourhood plans were further 'forward, and could therefore be given greater weight. Councillor Sturgis went on to say that: he hoped that the proposed amendments to the White Horse business park site would go some way to maintaining a gap between North Bradley and Trowbridge; and that Wiltshire Council would continue to work to support the North Bradley neighbourhood plan so that it would be better progressed by the time of the examination in public. The issue of alleged coalescence between the Trowbridge and North Bradley settlements is therefore identified to be one of the key issues from the Council's perspective relating to the Proposed Allocation's capacity. It is noted that the Community Area Topic Paper raises concerns regarding ecological (bat species) and heritage constraints, which would require mitigation in order to be satisfactorily addressed. We dispute the Council's concerns regarding the perceived coalescence of Trowbridge and North Bradley, and the limit on capacity created by the ecological and heritage constraints. For the reasons we will set out below we consider the Council's approach to reducing the overall dwelling capacity on site H2.2 to be unsound. The capacity of proposed allocation H2.2 should be reinstated as approximately 300 dwellings, as per the previous view of Planning Officers .

**Representations** We fervently disagree with the Council's position, that the Proposed Allocation is only capable of accommodating approximately 175 dwellings, in order to maintain a gap between the North Bradley and Trowbridge settlements, and provide appropriate mitigation. Our evidence base (and supported by the representations prepared by Linden Homes in relation to a separate parcel of the Allocation Site) supports a higher capacity. Crucially, the Council's own evidence base supports a higher capacity. For example, the WSHAP



Stage 4a Site Landscape Assessment concludes that the capacity of the Site to accommodate change is described as 'moderate-high', This is discussed further below. We feel that the Proposed Allocation is capable of accommodating at least 300 dwellings, without causing issues of coalescence with the North Bradley settlement. Specifically to these Representations, we feel that the Site (the northern parcel of land defined in the accompanying Vision Document) is capable of accommodating approximately 140 dwellings, again without causing issues of coalescence and provide adequate mitigation. This is now considered in full.

**Background on Relationship to Trowbridge** The Site is in close proximity to the existing settlement boundary of Trowbridge to the north (as defined by the Core Strategy 2015, fig 1), less than 50m to the south of the existing boundary. As part of the WHSAP, the Council are undertaking a settlement boundary review (WHSAP Topic Paper 1 Settlement Boundary Review Methodology, refers). This Topic Paper concludes that the White Horse Business Park to the east of the site meets the methodology for being included within the settlement. [MAP INSERT] Accordingly the Draft WHSAP proposes to include White Horse Business Park within the settlement boundary (fig 2). As a result, in addition to being in close proximity to the existing settlement boundary of Trowbridge to the north, the Site also abuts the proposed settlement boundary of Trowbridge - in its extended form - to the east (as defined by the Draft WHSAP, fig 2). The Site therefore relates well to the Trowbridge settlement and in combination with proposed housing allocation 'Elm Grove Farm', would enhance connectivity between the existing Trowbridge settlement and the established White Horse Business Park. Indeed delivery of residential development on the Allocation Site would bridge the separation between the business park and the wider settlement. The potential of the Allocation Site and the adjacent Elm Grove Farm allocation to be successfully integrated into existing and planned developments in the area, while maintaining a defensible buffer to North Bradley is recognised in the Trowbridge Community Area Topic Paper. The relationship between White Horse Business Park, the Proposed Allocation (ref 298) to the SW and proposed allocation 'Elm Grove Farm' (ref 613/248) to the SE is demonstrated in fig 2. The Site is ideally placed to provide improvements to walking and cycling routes through to the town, and the proposed masterplan shows how these improved linkages can be delivered as part of a residential development. The Proposed Allocation would therefore provide a cohesive and logical extension to Trowbridge. It should be noted that the Site would be directly connected to the settlement to the north and east, and would very much look to the north and Trowbridge in terms of connectivity and access to facilities.

**[MAP INSERT] Landscape Evidence and Design Solution** The previous Representations submitted to the Council on behalf of Castlewood in February 2018 provide the Council with an indicative illustrative layout and a Landscape and Visual Appraisal which concludes that there are no significant constraints to the delivery of residential units on the site. The LVA concludes that visually, the Site is relatively well contained on account of the existing hedgerow structure, generally flat topography, the surrounding mature tree belts and surrounding development. The visibility of the site is limited to occasional short distance views from immediate visual receptors. In the wider surrounding landscape, the cumulative effect of field boundary hedgerows and the flat low lying topography provide visual containment. Although, the site is likely to be glimpsed from raised land to the southeast, the intervening distance will prevent its features being discernible. The Site therefore has low visual prominence. There are strong landscape buffers on the edge of North Bradley and the development provides opportunities to reinforce existing landscape features. This will lead to a softening of views towards Trowbridge from North Bradley, especially as the existing settlement edge of Trowbridge is defined by commercial development and the proposed development will provide a softer, more permanent edge. The LVA acknowledges that whilst there would be some physical reduction in the separation between Trowbridge and North Bradley as a result of the Proposed Allocation, the visual effects could be minimised and mitigated. The proposed Masterplan provided in the accompanying Vision Document incorporates such mitigation measures, including:

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buffer the scheme from North Bradley. - The proposed masterplan proposes to implement significant new planting along the south-western boundary, in addition to significant existing planting to reinforce the visual separation between the proposed development and North Bradley. The LVA confirms that the development of the site could be achieved without resulting in significant landscape and/or visual impacts (in relation to the receptors identified in the LVA including the A363, Woodmarsh and residential properties on the eastern edge of North Bradley). In addition, the findings of the Council's own evidence base are significant. The WHSAP Stage 4a Site Landscape Assessment (June 2017) concludes that the overall magnitude of effect on views if the site were to be developed is identified as 'low adverse'. The capacity of Site 298 to accommodate change is described as 'moderate-high'. It is considered, therefore, that the site should be allocated for a much higher number of dwellings given the sustainable location and absence of any constraints which cannot be mitigated against. The overall effect will be to proportionately increase the quantum of market and affordable dwellings, which can be achieved through the Proposed Allocation, whilst simultaneously protecting the integrity of North Bradley as a village. Indeed, the opportunity to achieve a comprehensive design will provide greater opportunities for more meaningful green infrastructure provision, landscaping and open space. In summary, we contend that delivery of approximately 300 dwellings on the Proposed Allocation would not lead to unacceptable coalescence between Trowbridge and North Bradley. Residential development on the site would link, both visually and physically, primarily with Trowbridge and the adjacent White Horse Business Park, which is proposed in the WHSAP to form part of the Trowbridge settlement boundary. As demonstrated in the accompanying Vision Document, development on the site would be sensitively designed with the incorporation of new or strengthened landscape buffers and careful siting of built form to protect visual separation between the two settlements. Utilising the approach set out in the Vision Document, the Site could accommodate c. 140 units, as part of a wider 300 unit allocation.

**Housing Need** As a Principal Settlement, Trowbridge is a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026 and beyond. There are, however, severe constraints to the growth of Trowbridge. In particular, with Green Belt and Flood Zone designations to the north and west of Trowbridge (Fig 3), opportunities to expand Trowbridge in order to accommodate the identified housing need are limited. In proposing the allocation of this site, the Council identified that development of the site for housing would contribute to the area strategy for the town by boosting the supply of homes to help meet indicative requirements" [MAP INSERT] In the context of Trowbridge being a focus for growth and taking a large proportion of housing need, we wish to comment on PC25, which is a factual update to reflect the latest published Housing Land Supply Statement (March 2018) and to reflect PC55, PC60, PC64 and PC70 that propose higher densities on site allocations to make best use of land. PC25 relates to the following amended paragraph: Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 1,050 dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220 1,297."

In addition, related to the Trowbridge Community Area, the Council's Housing Land Supply Statement Addendum July 2018 Submission Version (ref: TOP/03C) indicates there is still an indicative residual requirement for the remainder of the Trowbridge Community Area of at least 2,230 dwellings during the remainder of the Plan period up to 2026. As things stand therefore the Council are not National planning policy is clear that the Council must look at its residential allocations beyond five years to ensure there is a consistent pipeline for bringing forward new residential development. The Council, despite the amendments, acknowledge that housing development at Trowbridge will fall short of the requirements. By failing to allocating sufficient quantum of new housing in the WHSAP, the Council is currently failing to fully meet its identified housing needs. The Plan has not therefore been positively prepared. To ensure a sound Plan, which is consistent with national planning policy, it is essential that either: a) additional site are identified and allocated; or b) greater quantum of housing is allocated on existing/ proposed allocations. In relation to option a), as set out above Trowbridge lacks genuine, alternative options to extend the settlement due to constraints, including Green Belt designations and Flood Zone primarily to the north and west. Consideration should therefore be given to intensify allocations proposed by the WHSAP, where technical constraints do not preclude this. As has been demonstrated by these Representations,

	<p>and in those previously submitted, there are no technical constraints which preclude a greater quantum of development than currently proposed in the WHSAP. Indeed, the Council have previously identified the potential of this site to accommodate c 300 dwellings, and the proposed reduction to 175 to accommodate ecology and heritage mitigation measures is unjustified. The technical work undertaken, and submitted to the Council during the WHSAP process demonstrate that the Proposed Allocation is capable of accommodating at least 300 dwellings with the incorporation of necessary mitigation measures. The sustainability appraisal undertaken by the Council identify the Proposed Allocation as a 'more sustainable' site. As such, priority should be maximising the housing numbers on this site in the first instance to address the outstanding house requirement, rather than looking towards 'less sustainable sites. Conclusion In summary, it is contended that proposed modification PC60 (and its consequential changes) to the WHSAP render the document unsound and contrary to paragraph 182 of the NPPF (2012). The proposed modification is inconsistent with the technical information provided to the Council, and the Council's own evidence base documents, which recognises the capability of the Proposed Allocation to accommodate a greater quantum of residential units whilst still maintaining appropriate separation between Trowbridge and North Bradley and providing adequate mitigation. The reduction in dwelling numbers for Proposed Allocation H2.2 does not represent positive preparation of the WHSAP. There is an identified housing need in the Trowbridge Community Area and the WHSAP as currently proposed does not meet the full requirement. It is recognised that mitigation will be required in relation to heritage and ecology matters, however the technical work undertaken has identified that appropriate mitigation can be accommodated with a greater quantum of dwellings than 175. Indeed, the accompanying Vision Document relating specially to our client's interests on the north parcel, identifies around 140 dwellings can be appropriately accommodated on that part of the allocation alone. In order to remedy this and make the WHSAP sound, we request that the capacity of the Proposed Allocation H2.2 is reinstated as "at least 300 dwellings", and consequential changes subsequently amended. Specifically to these Representations, we request that recognition is given to the capability of the Site to accommodating approximately 140 dwellings as part of the H2.2 allocation. In order to effectively put this case before the Inspector and address any questions they may have and to also rebuff any argument the Council may make for proceeding with proposed modification PC60 and its consequential changes we consider it necessary to attend the Examination Hearings in a speaking capacity. For reference, we append a full set of additional details as follows. These reports and drawings concern the proposed development of the Site and provide information regarding constraints: Vision Document Ecology Technical Note Flood Risk &amp; Drainage Technical Note Heritage Technical Note Highways Technical Note Landscape and Visual Appraisal</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	495	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187943	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	The proposed change to have this development removed from the WHSAP is therefore welcomed and I support it on the basis that: There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good and the Wiltshire Core Strategy states that development in Large Villages should be limited to small sites to meet local needs. The Crudwell Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring) and will allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future. I trust that this and similar representations will result in PC92 going ahead and thank you for your consideration in this matter				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	496	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy Bratton is a large enough village as it is. To build more houses outside the village boundary as proposed will change the nature and character of the village. They would put additional pressure on the facilities within the village. Access from the two sites would be unsafe into the centre of the village along already narrow and busy road.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			



<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	497	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187945	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. The number of proposed houses would mean small or no garden/green space. Modern houses are generally built with small, impractical sized rooms causing young people to have to entertain themselves outside - and if no garden, will impose them to seek entertainment in the few village spaces that there are. The sites are suitable for at most 1/2 the proposed dwellings. We need tasteful styled properties to be built in keeping with the existing village feel.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	498	<b>Consultee</b> Marlborough College	<b>Agent</b> Planning Associate Barton Willmore LLP	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1138628	<b>Person ID:</b> 1187946	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SB PC5				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Barton Willmore LLP previously submitted representations (September 2017) to the pre-submission draft of the Housing Sites Allocations DPD ('draft plan') on behalf of Marlborough College. These representations objected to the draft plan for the following reasons: 1. Relationship to the Neighbourhood Plan 2. Settlement Boundaries The College maintains an objection in respect of the first point. In short, the plan should make express provision and acknowledge that up to date local needs, including housing and social and community facilities, over and above the minimum requirements identified in the draft plan, should be identified and addressed through the neighbourhood plans and that such needs can be accommodated, where necessary, through further release of land. The College welcomes the revisions to the proposed changes to the Marlborough settlement boundary in respect of the College's land and the open space at College Fields. The College supports these changes. The objection in respect of the failure of the draft plan to recognise the role of neighbourhood plans and the relationship between the neighbourhood and draft plan remains. The draft plan therefore remains unsound. The proposed change meets a previous objection which I would now be willing to withdraw - OBJECTION MET IN PART (SEE ABOVE)				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	<p>Yes</p>	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	<p>Yes</p>

<b>Comment ID:</b>	499	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Why build houses that are not required, putting further pressure on an already stretched infrastructure.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			



<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	500	<b>Consultee</b> H G T Developments Ltd	<b>Agent</b> Associate Director Frampton	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1131752	<b>Person ID:</b> 1131750	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified	
<b>Identify Proposed Change Reference Number</b>	PC64				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>INTRODUCTION 1.1 This statement is submitted on behalf of HGT Developments in response to the focused consultation on proposed changes and associated evidence to the Wiltshire Housing Site Allocations Plan. 1.2 HGT Developments LLP control the land edged red as shown on the enclosed plan ( APPENDIX 1 ). 1.3 Submissions have been made at previous consultations on the draft Allocations Plans and these submissions should be viewed in context of our previous comments. 1.4 An outline planning application has been submitted on the site. The illustrative masterplan submitted as part of the planning application indicatively shows how the site could be developed to deliver up to 170 residential units. The application was validated on 5 February 2016 and given the reference number 16/00672/OUT. 1.5 The outline planning application submission comprises: Cover letter; Planning Statement; Application Forms; Red Line Site Boundary Plan; Illustrative Masterplan; Concept Illustrative Masterplan; Illustrative Landscape Masterplan; Development Framework Plan; Design and Access Statement; Landscape and Visual Impact Assessment; Ecology Appraisal; Habitat Regulations Assessment; Transport Assessment; Tree Survey Assessment; Statement of Community Involvement; Heritage Statement; Archaeology Desk Based Assessment; Archaeology Evaluation; Flood Risk Assessment; Foul Drainage Statement; Utilities Report; Air Quality Assessment; Phase 1 Contamination and Drainage Report; Geotechnical Report; and Noise Impact Assessment. 1.6 The Wiltshire Site Allocations Plan allocates the site for residential development under reference H2.3 (Elizabeth Way). The site is part of a larger allocation site of 355 dwellings. 1.7 HGT are working together with the adjacent landowners which comprise the various landowners for the allocation namely Barratt Homes, Persimmon Homes and Wiltshire Council (as landowners) and Wiltshire Council to prepare a Statement of Common Ground to be submitted in advance of the Examination in Public or the Site Allocations Plan. It is anticipated that a joint Drainage Strategy for the entire allocation will be appended to the Statement of Common Ground. 1.8 The proposed allocation (proposed change ref: PC64) amends the numbers proposed for the allocation site (H2.3, Elizabeth Way, Trowbridge) to 355 dwellings. 1.9 The site at Elizabeth Way (SHLAA 263) has been identified for the allocation of 355 dwellings, which has increased since the Pre-Submission draft plan. The proposed increase to 355 dwellings is welcomed but is lower than what the site could sustainably deliver. This raises the issue of under-development of the site which, in combination with the required housing figures, highlights the fact that the current proposed allocation has not been positively prepared or justified. 1.10 As stated above the current planning application for the site is for 170 dwellings, the remainder of the allocation is in Barratt Homes control and it is understood from their technical assessments that their site can sustainably accommodate approximately 175 dwellings, in combination this would equate to 345 dwellings. In total it is considered that the entire site allocation area could accommodate approximately 450 dwellings. 1.11 This</p>				

allocation is generally supported by HGT Developments LL, however, in order to make the plan sound, the allocation for the land at Elizabeth Way should be increased significantly to properly reflect the true capacity of the site. This will ensure the most efficient use of the site and will ensure that the proposed allocation is positively prepared, effective, justified and consistent with National Policy. 1.12 The continued allocation of the land will: assist the Districts housing need, including a diversity of housing stock for both market and affordable housing; assist in the vitality and viability of small businesses and services within Trowbridge; deliver public open space; enhance the biodiversity credentials on the site; retain and enhance existing vegetation on the site; and Improve accessibility and linkages to local services, in particular pedestrian links.

1.13 In the balance of planning considerations it is submitted the planning advantage lies firmly in continuing to allocate the land for housing to enable a comprehensive planned development to be achieved and to deliver new housing. 1.14 The Hilperton Neighbourhood Development Plan now forms part of the Development Plan and its policies will be given full weight when assessing planning applications that affect land covered by the Plan. Policy 1 states that land west of Elizabeth Way shall be carried out in accordance with the core strategy and the site specific requirements set out in the Wiltshire Site Allocations Plan (i.e. the draft site allocation).

2.0 INDICATIVE HOUSING REQUIREMENT FOR TROWBRIDGE

2.1 The purpose of the planning system is to contribute to the achievement of sustainable development (National Planning Policy Framework 2018 (the Framework) paragraph 6). For plan making this means that local planning authorities should positively seek opportunities to meet the development needs of the area. Local plans should meet the development needs of their areas need, with sufficiently flexibility to adapt to rapid change (the Framework paragraph 11).

2.2 Strategic policy-making authorities should have a clear understanding of the land available in their areas through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) Specific, deliverable sites for years one to five for the plan period, and b) Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

2.3 In terms of Local Plan making it is critical to the success of a plan that the Local Planning Authority positively plan to deliver homes, whilst also allowing for some flexibility. Paragraph 157 of the Framework states that: The planning system should be genuinely plan-led. Succinct and up to date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities and a platform for local people to shape their surroundings. Plans should: a) Be prepared with the objective of contributing to the achievement of sustainable development, b) Be prepared positively, in a way that is aspirational but deliverable, c) Be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees, d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

2.4 The Framework is clear that Plans will need to ensure the delivery of their strategy for housing and the main way of doing so is the allocation of specific, sustainable and deliverable sites. Soundness Test

2.5 When assessing whether a plan is considered to be sound, Paragraph 35 of the Framework identifies the 4 main factors which the Council need to consider: Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are sound if they are: a) Positively prepared providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighboring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development, b) Justified an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence, c) Effective deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidence by the statement of common ground, and d) Consistent with national policy enabling the delivery of sustainable development in accordance with the policies in this framework.

2.6 The deliverability of a Plan features as one of the key tests of soundness and the PINS Procedural Practice in the Examination of Local Plans (June 2016, para 1.1)

stresses this point: ..."the plan should focus relentlessly on the critical issues and the strategies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the whole point of the plan is to address the critical issues as far as possible." (Section 1: Pre-submission, Para. 1.1)

2.7 The Wiltshire Housing Site Allocations Plan is not sound as it is not positively prepared, justified, effective, nor consistent with national policy on housing delivery and plan making. This plan should be prepared based on the Wiltshire Core Strategy objectives which seeks to meet the objectively assessed housing need by the end of the plan period.

2.8 The six draft housing allocations identified within Trowbridge will provide land for approximately 860 dwellings. This figure falls below the indicative minimum requirement of dwellings set for Trowbridge over the plan period, as confirmed in Paragraph 5.11 of Topic Paper 4 Developing Plan Proposals Addendum (2018) of the Housing Site Allocations evidence base which states: the Plan allocations at Trowbridge have helped in offsetting delays at the strategic allocation, however the level of development at the Urban areas remains short of what was anticipated in the WCS Spatial Strategy.

2.9 The purpose of the Wiltshire Housing Site Allocations process is to address the shortfall of housing over the remainder of the plan period, up to 2026. Once adopted, the Plan will become an implementation mechanism to the Wiltshire Core Strategy (WCS) which should ensure that the housing requirements set by the WCS are met. Paragraphs 77-79 of the Inspectors Report for the Wiltshire Core Strategy (dated December 2014) refers to Wiltshires Objectively Assessed Need (OAN) being significantly higher than planned for through the Core Strategy, being in the region of +44,000 dwellings

2.10 The Inspectors Report, Paragraph 80 states: Whilst the achievement of such a figure should be subject to careful monitoring, the evidence indicates the fluctuations that can occur in the delivery of housing but does not conclusively indicate that such a delivery rate cannot be met during the course of the plan period to deliver the significant boost in housing required to go some considerable way to meeting needs. Against this context and mindful of the content of the LDS (partial CS Review), the subsequent intended early review of the CS, the Sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly.

2.11 Therefore, it is essential that the Wiltshire Housing Site Allocations Plan is positively prepared to allocate sufficient land as required to address the current undersupply of housing within Trowbridge that has arisen due to strategic site delays. The acknowledgement that 1,000 dwellings previously anticipated to be built at Ashton Park will now be delayed until the next plan period is reason to ensure that sufficient flexibility is included through the Site Allocations Plan: Consequently, I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more. (Inspectors Report, Paragraph 81)

2.12 In accordance with Paragraph 67 of the Framework, in order for the plan to be sound it must use the baseline evidence gathered to ensure that the full objectively assessed housing needs set out in the Core Strategy are met. This is currently not the case, and is demonstrated by the dwelling shortfall in Trowbridge.

### 3. CONCLUSIONS

3.1 The allocation of Policy H2.3 for Land south of Elizabeth Way is generally supported. The delivery of housing and its associated infrastructure to support future growth would be achieved by the continued allocation of the site for housing which is in a sustainable location for new development. The allocation of the site: is necessary to provide housing that is needed within the local housing market; is of sufficient scale to secure the delivery of new infrastructure including public open space, and upgraded linkages (vehicular and pedestrian); will result in housing that can be viably constructed at an appropriate density to safeguard the setting of the settlement; and will increase public access through the formation of areas of open space and public footpaths.

3.2 In summary, the continued allocation of the site will: result in a deliverable residential development (to assist in meeting the Councils housing targets) in a sustainable location resulting in efficient use of the site; the provision of a range and mix of dwellings to meet housing needs, allowing provision of a balanced a mixed community. A wide range of high quality and well-designed housing will contribute to existing communities and enhance local facilities; assist the Districts housing need, including a diversity of housing stock for both market and affordable housing; achieve development in a sustainable location, with easy access to pedestrian routes, local facilities and amenities and close to public transport including bus routes; assist in the vitality and viability of small businesses and services within the settlement; deliver public open space; enhance the ecology of the site including an increase in tree planting, the ecological enhancements will support a range of species, in particular bats, birds and invertebrates; retain and

	<p>enhance existing vegetation on the site; a substantial area of open space, creating a green network through the site, including a Local Equipped Play Areas (LEAP) and a Local Play Area (LAP) and areas of ecological enhancement are proposed; the public footpaths shall be improved on site to improve existing permeability; and benefits as set out in the draft S106 heads of terms include contributions to local social infrastructure, such as; education, leisure and green infrastructure and affordable housing. 3.3 However, the Housing Site Allocations Document is unsound as it has not been positively prepared and is not justified due to the fact that the indicative housing requirement which has been set for Trowbridge has not been met through the proposed allocations. Further to this, the Plan does not propose to make efficient use of land to be allocated by increasing numbers where possible, which is unsustainable and not consistent with National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	501	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187950	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Is there any way or will there be any pressure applied to WCC to provide better public transport that at this present time is woefully inadequate, perhaps this would alleviate the more than 400 vehicles an hour passing through the village as mentioned within the consultation. If it is the intention for WCC to build on at least one site I would have thought the lack of provision of public transport would be reason enough to raise objections.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	503	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187951	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

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<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	504	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187952	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
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	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	505	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1122130	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	506	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187954	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	507	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187955	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. The density of houses proposed speaks ONLY of the greed of the developers, and NOTHING of quality for the prospective inhabitants, or for the village. It would not give space for decent village houses with enough garden which a prospective village dweller could expect to have. Privacy and comfort would be undermined by such overcrowding. I agree that these proposed housing developments would damage the village.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	508	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187956	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			



	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	509	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187957	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. I am yet to be convinced that we are either required to have or need additional housing in the village. It appears that these two options are therefore being forced upon the village which I am very much against - especially the numbers being talked about. Above all I fully concur with the point about loss of green space - especially within the village confines. Any infilling would be totally inappropriate, if considered given the few remaining sites and the loss over the last few decades.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	510	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187958	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	511	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187957	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	CATP/19				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. I am yet to be convinced that we are either required to have or need additional housing in the village. It appears that these two options are therefore being forced upon the village which I am very much against - especially the numbers being talked about. Above all I fully concur with the point about loss of green space - especially within the village confines. Any infilling would be totally inappropriate, if considered given the few remaining sites and the loss over the last few decades.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

**Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.**

**Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.**

<b>Comment ID:</b>	512	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1126215	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. Both sites 738 and 321 are inappropriate for the allocation of the proposed number of houses, especially as smaller developments have already been rejected on this site. Access to both sites would be dangerous and will increase traffic on the B3098 and Court Lane, which are both narrow, blind in places and busy roads already, there have been numerous serious accidents in the past year. School children have to walk on the road as there is no pavement on Court Lane to cross the busy lane to access a safe route to school, and increase in traffic on Court Lane will make an already dangerous road to cross an accident hotspot. Any children that may live in the proposed housing will have to cross the top of Court Lane which is a blind spot and very dangerous to cross already with current usage. They will need to do this to access all village facilities, school, park, village hall, shop. Current services and amenities are already overstretched, a new development is not needed in the village and is no benefit to current or new residents. Living on Rosenheim Rise we are very concerned about proposed site 321 as this field currently works as a flood barrier for our road, which when it rains heavily water runs down the road. If the field is developed there is an increased risk of flooding from surface water leading to possible subsidence. Also any development would be higher than our property, cutting out daylight and invading our privacy. There are hundreds of new houses being built in Westbury, Bratton does not need to be developed, links to Westbury need to be upgraded instead of putting strain on already strained amenities.

<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-</b></p>			

<p><b>submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	513	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1132525	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	CATP/19				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Regarding site 738 - 14 houses on land adjacent to Dane's Lye The planned size of development here is for 14 properties, which would give it a similar density to Rosenheim Rise, where I used to live. I have two concerns. Firstly, at this density, I hope that each property would be provided with two parking spaces to prevent parking on pavements and anti-social parking. This has become an increasing problem in Rosenheim Rise, and the other estate developments within the village. Secondly, I would be worried about the access to this site. There appears to be an access point from Castle Road to the land in question, but I suspect that developers wish for access directly onto the B3098. This latter option would be dangerous, as the junction would be on a non-linear approach to the village and visibility would be an issue. The safest access is definitely from Castle Road to the southeast corner of the land in question.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Comment ID:</b>	514	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187959	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Clearly, Bratton has been 'assessed' for housing development potential using incorrect data. As a community, I'm sure there would be little opposition to a development of, say, 10 houses in small clusters but the current proposed plans are not sustainable. Bratton surgery is now under considerable pressure. It often takes 3 weeks wait to see a GP and if it's really urgent you will be asked to call back the next morning at 8am to achieve a date from the newly released appointments. The B3098 is now a busy and often dangerous thoroughfare thro' Bratton. Speeding is a problem and the number of very large HGV's passing thro' the village has increased dramatically during the last 3 years. Satellite navigation systems are a factor creating this change. Emptying the cars from 2 large housing estates, virtually opposite each other, onto the B3098 at work/school start times in the morning does not sound like good design or planning. Many of the paths and pavements are not continuous at the extremes of the village and therefore would not be safe/suitable to service the proposed plans. Bratton has not adapted well to the requirements of people with disabilities and again, would be inadequate to meet the proposals.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the</b></p>			

<p><b>Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	515	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187961	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. We feel that such extensive development of an urban nature sited at the entrance to the village will degrade the quality of life for all existing residents. The development proposal is designed to generate a high value return for the house builder by cramming as many dwellings as possible into a small area. The result, judging by the many other local examples, will be the loss of rural identity and the establishment of commuter-belt living. Existing sodium street lighting from the edges of Westbury and Trowbridge has polluted the night sky with and orange glow that is impossible to ignore. Bratton is a typical large village in Wiltshire. It is a pity to fill in every green space here as it will change the nature of the village. Already, this has made quite a difference in Bratton with Reeves Piece, the Hyde's garden, and many other infills, and now great concern for the site of Oxford House. The main problem is the addition of at least 2 cars to every new house. Sometimes more. The B3098 is a very busy road, especially at rush hour. This proposed expansion will exacerbate the already difficult situation. There are no pavements for walking children to school from this site without crossing this very busy main road. To provide a pavement will narrow this main road. In addition, hasn't the very extensive housebuilding scheme in Westbury already provided more houses than was originally planned? This has placed a dreadful burden on local medical services. When attempting to make a doctor's appointment, we can expect to wait at least 3 weeks! The surgeries at Bratton are often curtailed so that Westbury patients can have a better (if still abysmal) service. The staff at the White Horse Surgery are concerned about not being able to cope with the massive increase to their work. It would be foolhardy to further exacerbate this failing system.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one</b></p>			

<p><b>you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	516	<b>Consultee</b> C G Fry Limited	<b>Agent</b> Savills UK	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1122879	<b>Person ID:</b> 1187963	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective	
<b>Identify Proposed Change Reference Number</b>	PC15				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Housing settlement policy and distribution of new housing numbers needs to be mindful of the needs of the rural area and rural villages, as well as more urban centres. The Housing Market Areas analysis and distribution of housing across the county's locations ought not to be swayed or disoriented by macro-level sentiment or pressure exerted by stakeholders with more vested interests or policy purpose that is narrower in focus, such as Natural England and the Planning Boards for the various designated A.O.N.B.s in the county. Rural new housing is of vital importance.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>No</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>No</p>



<b>Comment ID:</b>	517	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. - School The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. - not a large village Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Traffic</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Allocations Plan has been published.</b>			
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<b>Comment ID:</b>	518	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187964	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Access to 738 and 321 sites on the B3098 on the NARROWEST part of the road will cause absolute chaos . These fields are within the green belt for sheep, cows, horses and Llamas and extra people, and dogs will lead to trouble through ignorance of the countryside way of life. Our village school has no more room to expand and is a very good well run school. Doctors surgery under pressure. Bratton Village has already quadrupled in size since 1970 - and how is the Wiltshire Council going to cope with extra refuse collections and the other amenities. How long will the B3098 be closed for and other alternative routes proved to be disastrous; after the closure of two weeks for a small footpath to be installed. Surely all the building in Westbury is enough for all the financially greedy developers to handle; not to mention very large estates all around the Trowbridge and Melksham areas. LEAVE BRATTON ALONE. please</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the</b></p>			

<p><b>proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	519	<b>Consultee</b> C G Fry Limited	<b>Agent</b> Savills UK	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1122879	<b>Person ID:</b> 1187963	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective	
<b>Identify Proposed Change Reference Number</b>	PC28				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Housing settlement policy and distribution of new housing numbers needs to be mindful of the needs of the rural area and rural villages, as well as more urban centres. The Housing Market Areas analysis and distribution of housing across the county's locations ought not to be swayed or disoriented by macro-level sentiment or pressure exerted by stakeholders with more vested interests or policy purpose that is narrower in focus, such as Natural England and the Planning Boards for the various designated A.O.N.B.s in the county. Rural new housing is of vital importance.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>			
<b>Please state which evidence document this representation relates to:</b>		<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>			
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	520	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 704614	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Is this housing really necessary in the light of the number of new houses in Westbury which are closer to facilities and transportation links? Instead of destroying these green spaces why not use them to enhance the environment e.g. plant trees.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	521	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187965	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

	<p>Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. It has always been a criteria in housing development that homes should be provided where they are needed. The local survey has identified that only a small number of properties are likely to be required by people who have need to live in Bratton? There's no source of employment in the village and therefore a very large percentage of these properties will be purchased by people who need to travel daily outside the village to work. Bratton is very poorly served by public transport. (Five buses a day in each direction on a route from Trowbridge to Devizes and one return journey a week to Bath,) Most if not all of the new commuter traffic would therefore take place by car, which is now being actively discouraged. Westbury and Warminster are reached by using the B3098, a very narrow two lane road. Melksham, Bath, Chippenham, M4 and M5 are reached after a considerable distance on narrow, winding country roads.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
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<b>proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	

<b>Comment ID:</b>	522	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1125789	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

	<p>and across Court Lane is unsafe due to the hazardous road junction at Court Lane, the quantity of traffic using the highway and the inadequacies of the existing pavement. Access to and from Site 738 for vehicles and cyclists will be unsafe due to poor visibility, lack of sufficient sightlines, the narrowness of the highway, quantity of traffic and accessing the highway will be a danger to other traffic. Pedestrian access to and from the village from Site 738 will be unsafe, reaching the pavement on the northern side will mean crossing the highway at a point of poor visibility for pedestrians and drivers. Bicycle access to and from the site is hazardous and there is little opportunity for a bicycle lane on either side of the highway, a point which affects site 321 in the same way but not assessed in Stage 4a. There is loss of green space and agricultural land. Developments of this size will add to the existing pressures on Bratton Surgery. The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages " are not promoted by National Policy. Bratton Primary School is already taking children from Westbury as their schools are now over subscribed, with still more potential school age children with houses being built in Westbury. Water pressure in Bratton is low, how will these extra houses impact our water supply. The position of these developments is at the narrowest part of the B3098, and with the amount of HVGs using this road a roundabout? to service both these developments would be disastrous / dangerous.</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<p><b>Supporting documents (Please see Objective)</b></p>			
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<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	523	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187966	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations. Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement and across</p>			

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**Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:**

**Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).**

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<p><b>Supporting documents (Please see Objective)</b></p>			
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<b>Comment ID:</b>	524	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b>	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
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<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
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<b>Comment ID:</b>	525	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187968	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



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<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			

<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>		<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	
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<b>Comment ID:</b>	526	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1119432	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	Yes
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [GENERAL]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	527	<b>Consultee</b> Chair Crudwell Parish Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187981		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Re: Crudwell Parish Council in support of the removal of Ridgeway Farm - Wiltshire Housing Site Allocation Proposed Change Reference Number PC92 Crudwell Parish Council fully supports the decision at Cabinet Level to remove the Ridgeway Development from the Housing site allocation plan and would like to restate its comments on the original plan that decisions of this type are best made by local people at a local level with the support of the community. Crudwell Parish Council continues to object to the proposed allocation of Ridgeway Farm for 50 dwellings (or 40 additional dwellings) on the basis that: there is no strategic need for the Housing Site Allocations Plan to identify any housing sites in the Malmesbury Community Area; in that context, Wiltshire Council's own documentation states that "the most appropriate means to assess local needs and plan growth at each Large Village is through the neighbourhood planning process" The emerging Crudwell Neighbourhood Plan is advancing rapidly and has already been the subject of a number of rounds of public consultation and exhibitions; the Crudwell Neighbourhood Plan will identify a housing site or sites to meet its local housing needs as defined by a housing needs assessment produced to inform it; the collaborative and inclusive approach adopted in producing the Crudwell Neighbourhood Plan is intended to achieve public support to a far greater extent than Wiltshire's Housing Site Allocations Plan has achieved; On that basis, we support the Housing Site Allocations Plan removal of any proposed allocations in Crudwell, and allow the Crudwell Neighbourhood Plan to make the decision about Crudwell's growth. [APPENDED LETTER ATTACHED]				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5147785</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	528	<b>Consultee</b> Clerk	<b>Agent</b> Person ID:	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1187985		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC92				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I support the proposed change to remove the Ridgeway Farm site from the Wiltshire Housing Site Allocations Plan because there is no Strategic Need for Wiltshire to allocate housing in Crudwell. It is neither justified, nor necessary - supply in the Housing Market Area is good and the Wiltshire Core Strategy says development in Large Villages should be limited to small sites to meet local needs. Alongside this, Crudwells Neighbourhood Plan is progressing extremely well (Reg14 Consultation planned for November 2018 and Reg16 planned for early Spring), and this will allocate land to meet identified needs. The Councils and Governments Localism agenda is best served by allowing the Parish to determine its own future.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>Yes, the Proposed Change meets a previous objection which I would now be willing to withdraw</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Comment ID:</b>	529	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187998	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	SBR PC31				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	I only found out today that we could comment on the proposed change to the settlement boundary around Codford. At this present time we disagree as it doesnt go far enough toward the end of Codford st peter end. We have a piece of land on the old A36 just below Ivy cottages .we would love to build our retire home behind the stone wall of old Ashton Gifford house,it would tidy the area up which over the last 10 years has been used as a dumping ground and a parking area for the local Garage. I would like to invite you down to see the area im talking about we have lived in the area over the last 30 years and would love to stay.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	530	<b>Consultee</b> Barratt Homes	<b>Agent</b> Planning Officer Barton Willmore	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 392036	<b>Person ID:</b> 1126545	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC25				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1.0 INTRODUCTION 1.1 This representation is submitted on behalf of Barratt Homes in respect of their land interests to the south of Elizabeth Way, Trowbridge. It responds to the Focused Consultation on the Schedule of Proposed Changes and evidence base documents which includes updates and addendums to the following; Topic Papers, Technical Reports and Proposed Changes Consultation Documents, and in doing so, outlines how development of the Land at Elizabeth Way would contribute to the achievement of the proposed spatial and sustainability objectives. A location plan for the site has been attached to Appendix 1. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations DPD along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. Since this time, Planning Inspector Steven Lee has been appointed to undertake the examination. In August 2018, the Council received a procedural letter from the Inspector requesting Wiltshire Council to undertake consultation on the Schedule of proposed changes as these changes had yet to be consulted upon in public. 1.3 The Representation forms specifically request feedback on whether it is commonly considered that the Site Allocations Plan and evidence base is sound. There is much in the plan that we support, but at present, our response is that the draft Site Allocations Plan is unsound as it has not been positively prepared and is not justified. This is primarily due to the fact that the indicative housing requirement which has been set for Trowbridge has still not been met through the proposed allocations. We have set out our justification for reaching this view in more detail in the following sections. 2.0 SUMMARY OF PROPOSED CHANGES TO THE PLAN 2.1 We have reviewed the Schedule of Proposed Changes relating to the Trowbridge Community Area, and more directly to the proposed allocation at Elizabeth Way, these are set out below: Historic Landscape Classification has now been included within the SA assessment tables against SA Objective 6 which has not affected scoring therefore no changes have been made to the Trowbridge assessments in this regard; SHLAA site 293 Land to the east of Elizabeth Way is to be divided into two parts with the western area to be included as part of the proposed allocation (H2.3) and will help to deliver circa 120 additional dwellings at this location; Proposed quantum of Elizabeth Way Site Allocation (H2.3) has increased from 205 dwellings (July 2017), to 355 dwellings (September 2018) due to this additional SHLAA site 293 being introduced; Wiltshire Council have published the 2017 Housing Land Supply Statement (March 2018) and released calculations based on the current housing land supply prior to applying the proposed allocations. The indicative residual requirement for Trowbridge, excluding proposed allocations, is now 2,230 dwellings up to 2026. This is an increase from the previous indicative figure of 2,050 dwellings; The Council acknowledge that the proposed allocations through the Site Allocations DPD for Trowbridge are not capable of delivering the full indicative requirement, and instead amount to a total of 1,050 dwellings. We have therefore calculated a deficit of 1,180 homes within</p>				

Trowbridge over the plan period up to 2026. It is important to note that PC25 of the Schedule of Proposed changes document highlights a deficit of 1,297 dwellings at Trowbridge which, on review of the evidence base, we have been unable to connect this figure and seek further clarity on this point.

2.2 It is important to note that on behalf of our client Barratt Homes, we have previously engaged with the Wiltshire Housing Site Allocations DPD consultation process and submitted representations to the Pre-submission Consultation which took place between July and September 2017. In addition, discussions with policy officers have taken place to demonstrate the deliverability of land at Elizabeth Way for circa 450 dwellings.

2.3 As this current Schedule of Proposed Changes Consultation is based on whether the Plan is considered to be sound, we have therefore focused this representation to only raise issues based on soundness.

3.0 SOUNDNESS OF THE PLAN

3.1 This section of the representation seeks to review relevant planning policy on a national level relating to the provision for housing, and on this basis, whether the local planning authority has prepared a Local Plan that is sound.

3.2 It is important to raise the point that although the updated NPPF was published in July 2018, the implementation period allows for the previous Framework to be used for those plans submitted for examination before January 2019. Annex 1 Implementation, paragraph 214 of the updated NPPF (2018) states that, "The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019."

3.3 In this case, Wiltshire Council submitted the Sites Allocations DPD plan to the Inspector in August 2018 therefore the previous Framework will still apply. Delivering housing need

3.4 The NPPF (2012) sets out 12 Core Principles which were formed to underpin plan making, one of which is particularly relevant to making provision for housing. This states that planning should, "Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities" (NPPF, para 17)

3.5 Further guidance on the delivery of housing is set out in Para 47 of the NPPF and states, "To boost significantly the supply of housing, local planning authorities should: use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period; identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements..." (NPPF, para 47)

3.6 In terms of Local Plan making it is critical to the success of a plan that the Local Planning Authority positively plan to deliver homes, whilst also allowing for some flexibility. Paragraph 157 of the NPPF states that, "Crucially, Local Plans should: Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this framework." (Paragraph 157)

3.7 The NPPF emphasizes the need for plans to ensure delivery of their strategy for housing and the main way of doing so is the allocation of specific, sustainable and deliverable sites.

Soundness Test

3.8 When assessing whether a plan is considered to be sound, Paragraph 182 of the NPPF identifies the 4 main factors which the LPA need to consider: "A local planning authority should submit a plan for examination which it considers is sound namely that it is: Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; Effective the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework." (NPPF, para 182)

3.9 The deliverability of a Plan features as one of the key tests of soundness and the PINS Procedural Practice in the Examination of Local Plans (June 2016, para 1.1) document stresses this point: "...the plan should focus relentlessly on the critical issues and the strategies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the whole point of the plan is to address the critical issues as far as possible." (Section 1: Pre-submission, Para. 1.1) Achieving appropriate densities

3.10 A critical update included within the revised NPPF (2018) focuses on the importance of making the most efficient use of land. Paragraph 123 of the revised NPPF states that, Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decision avoid homes being built at low densities and ensure that development make optimal use of the potential of each site. In these circumstances: a) Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. 3.11 Although the examination of the plan is based on the old NPPF, this direction of travel as set out within revised national policy needs to be considered through the examination by the Inspector in order for the plan to be sound. The quantum of housing development proposed at Trowbridge is falling increasingly short of the indicative requirement and needs to be addressed if the plan is to succeed. Deliverability 3.12 The revised 2018 NPPF, sets out the test for determining whether a development site is deliverable. Paragraph 73 of the NPPF states: Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. 3.13 The NPPFs Annex then defines deliverable as: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. 3.14 The emphasis on deliverability within the updated NPPF has changed and has given power to Development Management officers when decided applications, paragraph 76 states; To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing, local planning authorities should also assess why an earlier grant of planning permission for a similar development on the same site did not start. 3.15 We do not consider the Wiltshire Housing Site Allocations Plan to be sound in its current form as it is not positively prepared, justified, effective, nor consistent with national policy on housing delivery and plan making. This plan should be prepared based on the Wiltshire Core Strategy objectives which seeks to meet the objectively assessed housing need by the end of the plan period. 3.16 We set out below the reasons why we consider the draft plan to be unsound in its current form: The plan has not been positively prepared due to the fact that more than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, with a calculated deficit of 1,180 dwellings. At this stage of the plan making process Wiltshire Council should be required to establish how the identified housing need can be met over the plan period, and with regards to Trowbridge Community Area it clearly does not. This proves that the draft proposals have not been consistently prepared using the evidence gathered. The Plan is contradictory to, and does not reflect, the strategy which was set and approved by the Inspector of the Core Strategy in December 2014. The proposed quantum of 355 dwellings currently associated with allocation H2.3, does not meet the full potential capacity of the site, therefore proving that the plan is not justified as it does not make efficient use of land to be allocated through the Site Allocations Plan. 4.0 INDICATIVE HOUSING REQUIREMENT FOR TROWBRIDGE 4.1 The six draft housing allocations identified within Trowbridge will now provide land for approximately 1,050 dwellings. This figure falls significantly short of the updated indicative minimum requirement of 2,230 dwellings set for Trowbridge over the plan period by a total of 1,180 dwellings. It is important to note that PC25 of the Schedule of Proposed changes consultation document highlights a deficit of 1,297 dwellings, we have been unable to reconcile this figure

through the evidence base produced by Wiltshire Council and therefore would like to raise this point to be clarified by the Council. 4.2 The Council have prepared an Addendum report to be read in conjunction with Topic Paper 4 Developing Plan Proposals. The Addendum was produced to review the confirmed 2017 housing land supply position and how this would affect the plan proposals. 4.3 It is important to note that the original purpose of Topic Paper 4 Developing Plan Proposals from the outset was to meet two objectives of the Plan which were: To help demonstrate a rolling five-year supply of deliverable land for housing development; and To allocate sites at the settlement in the County that support the spatial strategy. 4.4 Since the publication of the Pre-submission version of the plan in July 2017, the total amount of dwellings proposed for Trowbridge has not met the indicative requirement set for the area. Although the Schedule of Proposed Changes has increased the capacity of two proposed site allocations (Land at Elizabeth Way and Elm Grove Farm) within Trowbridge, the overall indicative requirement has further increased from 2,050 homes to 2,230 homes, due to the published 2017 housing land supply figures. 4.5 Topic Paper 4 previously identified two reasons for this under provision of housing within Trowbridge: 1. The delay of developing Ashton Park Urban Extension, which was allocated through the Wiltshire Core Strategy for 2,600 dwellings to be built on site within the plan period, up to 2026. It has now resulted in only 1,600 dwellings being built within the plan period and the remaining 1,000 dwellings will be built post 2026. This accounts for 1,000 dwellings out of the 1,220 dwellings shortfall; 2. Inability to identify land free from environmental constraints which could compensate for the consequences of the delay to the Ashton Park development. 4.6 The addendum now states that, the need for detailed Habitats Regulation Assessment, and subsequent bat mitigation strategy have continued to delay delivery of the strategic allocation at Ashton Park, Trowbridge. 4.7 The purpose of the Wiltshire Housing Site Allocations process is to address the shortfall of housing over the remainder of the plan period, up to 2026. Once adopted, the Plan will become an implementation mechanism to the Wiltshire Core Strategy (WCS) and should ensure that the remaining housing requirements set by the WCS are met. Paragraphs 77-79 of the Inspectors Report for the Wiltshire Core Strategy (dated December 2014) referred to Wiltshires Objectively Assessed Need (OAN) being significantly higher than planned for through the Core Strategy, being in the region of +44,000 dwellings, Whilst the achievement of such a figure should be subject to careful monitoring, the evidence indicates the fluctuations that can occur in the delivery of housing but does not conclusively indicate that such a delivery rate cannot be met during the course of the plan period to deliver the significant boost in housing required to go some considerable way to meeting needs. Against this context and mindful of the content of the LDS (partial CS Review), the subsequent intended early review of the CS, the Sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly. (Inspectors Report, Paragraph 80) 4.8 With this in mind, we consider that it is critical that the Wiltshire Housing Site Allocations Plan is positively prepared to allocate sufficient land as required to address the current undersupply of housing within Trowbridge and meet the direction of travel approach now being sought through National Policy. 4.9 The acknowledgement that 1,000 dwellings previously anticipated to be built at Ashton Park will now be delayed until the next plan period is reason to ensure that sufficient flexibility is included through the Site Allocations Plan, Consequently, I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more. (Inspectors Report, Paragraph 81) 4.10 In accordance with Paragraph 47 (bullet point one) of the NPPF (2012) in order for the plan to be sound it must use the baseline evidence gathered to ensure that the full objectively assessed housing needs set out in the Core Strategy are met. This is currently not the case and is demonstrated by the 1,180 dwellings shortfall in Trowbridge. 5.0 FIVE YEAR HOUSING LAND SUPPLY 5.1 The Pre-submission Site Allocations Plan evidence base included Topic Paper 3 Housing Land Supply which demonstrated the Councils land supply position as of June 2017. At this stage of the process the Council had produced an estimated 2017 base position as the 2016/17 annual completions were still being calculated. Since this time, the Council have been able to publish their 2017 housing land supply position (March 2018) which has led to updated indicative requirement figures. 5.2 In order to make the plan sound, the Wiltshire Housing Site Allocations Plan is required to identify sufficient land to meet the overall housing need for Trowbridge. The below table is taken from the Topic Paper 3 addendum report (July 2018) which highlights that following the 2016/17 delivery calculations the indicative requirement for Trowbridge as of 2017 has

increased by 213 dwellings: [TABLE INSERT] 5.3 Wiltshire Council have previously stated that the Liverpool Method appropriately reflects the delivery strategy set out within the Wiltshire Core Strategy for calculating housing supply. The Liverpool method of calculating 5-year supply aims to spread the delivery of housing over the plan period, and not to front-load any under-provision to date. We are of the view that the Sedgfield approach conforms more closely with the requirement to plan positively as it seeks to boost significantly the supply of land for housing in the early part of the plan period. In either method, in order to rectify the current housing shortfall over the remainder of the plan period (up to 2026) the Site Allocations Plan must maximise the identified sustainable development opportunities within Trowbridge, which will in turn help to bolster the housing supply in the area. 5.4 The Topic Paper 3 Addendum report (July 2018) includes table 3.4 (below), which itemises the Councils projected level of housing supply from 2017-2026 for the North and West HMA. As can be seen, it is marginally above 6 years up to 2020/21, when supply then drops to 5.3 years in 2023/2024. [TABLE INSERT] 5.5 On review of the housing trajectory included within the Housing Land Supply Statement published in March 2018 a number of the small sites (less than 10 dwellings) listed within Trowbridge CA considered to be developable within the plan period have permissions dating pre-2015, therefore it would appear to be unclear if these sites will realistically come forward. 5.6 In order to avoid slipping below the 5 years supply the Council need to be more proactive in bringing forward sites early in the plan period. Taking the above into consideration and reviewing the proposed five-year supply figures at Table 3.4 (above) the delivery is only marginally above 5 years, meaning that the plan is not robust or sound in its current form. 5.7 In order to make the plan sound additional evidence needs to be provided as to how the Councils will maintain a 5-year supply. In order to assist them in doing so: Wiltshire Council need to maximize site capacity for the development of housing within each of the identified proposed allocations; Eliminate any small sites which have expired from the 5-year land supply calculations; Ensure that the proposed Allocations are deliverable sites, and able to come forward soon after the adoption of the plan. 6.0 TECHNICAL ISSUES 6.1 The site at Elizabeth Way (Allocation H2.3) encompasses approximately 16.33ha of land and is now proposed to be allocated for a total of 355 dwellings. It is acknowledged that due to the proximity of the site to Hilperton Gap, and the location of the Bradford and Bath Bats SAC to the south of Trowbridge, the site may have constraints which will need to be addressed prior to development. In order to gain a better understanding of these issues Barratt Homes have undertaken various technical assessments on the site, south of Elizabeth Way, which have proven that a higher quantity of housing is possible on the site. 6.2 A Vision Document has been produced, submitted alongside previous representations, which set out the proposed design principles for the site and summarizes the specialist technical input received to date. A summary of the key issues is set out below. Site Boundary 6.3 Since the publication of the Pre-submission Plan the site boundary identified for the proposed allocation at Elizabeth Way was incorrect. Through previous representations and discussions with officers we highlighted that the site boundary identified on the plan did not align with Elizabeth Way Relief Road. From these discussions with Planning Policy Officers we understood that this error would be rectified prior to submission to the Inspector. 6.4 We are in support of the update to the site boundary, which has also been accompanied by the Council proposing that an additional 150 dwellings can be accommodated on the site. Capacity of Site 6.5 The site at Elizabeth Way has been identified for the allocation of 355 dwellings, which is considerably lower than what the site could sustainably deliver. This raises the issue of major under-development of the site which, in combination with the required housing figures, highlights the fact that the current proposed allocation has not been positively prepared or justified. 6.6 Using the evidence gathered by the technical assessments we have calculated that the Barratt site can sustainably accommodate approximately 175 dwellings, which in combination with the current planning application submitted to the west of the site (16/00672/OUT) for 180 dwellings, would equate to 355 dwellings prior to the eastern section of the site allocation even coming forward. 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<p><b>Supporting documents (Please see Objective)</b></p>	5147790		
<p><b>Does your representation relate to a previous one</b></p>	No, the Proposed Change does not meet a previous objection		



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<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	531	<b>Consultee</b> Barratt Homes	<b>Agent</b> Planning Officer Barton Willmore	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 392036	<b>Person ID:</b> 1126545	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC26				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>[REFER TO ATTACHMENT FOR FULL REPRESENTATION] 1.0 INTRODUCTION 1.1 This representation is submitted on behalf of Barratt Homes in respect of their land interests to the south of Elizabeth Way, Trowbridge. It responds to the Focused Consultation on the Schedule of Proposed Changes and evidence base documents which includes updates and addendums to the following; Topic Papers, Technical Reports and Proposed Changes Consultation Documents, and in doing so, outlines how development of the Land at Elizabeth Way would contribute to the achievement of the proposed spatial and sustainability objectives. A location plan for the site has been attached to Appendix 1. 1.2 The Council submitted the draft Wiltshire Housing Site Allocations DPD along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination in July 2018. Since this time, Planning Inspector Steven Lee has been appointed to undertake the examination. In August 2018, the Council received a procedural letter from the Inspector requesting Wiltshire Council to undertake consultation on the Schedule of proposed changes as these changes had yet to be consulted upon in public. 1.3 The Representation forms specifically request feedback on whether it is commonly considered that the Site Allocations Plan and evidence base is sound. There is much in the plan that we support, but at present, our response is that the draft Site Allocations Plan is unsound as it has not been positively prepared and is not justified. This is primarily due to the fact that the indicative housing requirement which has been set for Trowbridge has still not been met through the proposed allocations. We have set out our justification for reaching this view in more detail in the following sections. 2.0 SUMMARY OF PROPOSED CHANGES TO THE PLAN 2.1 We have reviewed the Schedule of Proposed Changes relating to the Trowbridge Community Area, and more directly to the proposed allocation at Elizabeth Way, these are set out below: Historic Landscape Classification has now been included within the SA assessment tables against SA Objective 6 which has not affected scoring therefore no changes have been made to the Trowbridge assessments in this regard; SHLAA site 293 Land to the east of Elizabeth Way is to be divided into two parts with the western area to be included as part of the proposed allocation (H2.3) and will help to deliver circa 120 additional dwellings at this location; Proposed quantum of Elizabeth Way Site Allocation (H2.3) has increased from 205 dwellings (July 2017), to 355 dwellings (September 2018) due to this additional SHLAA site 293 being introduced; Wiltshire Council have published the 2017 Housing Land Supply Statement (March 2018) and released calculations based on the current housing land supply prior to applying the proposed allocations. The indicative residual requirement for Trowbridge, excluding proposed allocations, is now 2,230 dwellings up to 2026. This is an increase from the previous indicative figure of 2,050 dwellings; The Council acknowledge that the proposed allocations through the Site Allocations DPD for Trowbridge are not capable of delivering the full indicative requirement, and instead amount to a total of 1,050 dwellings. We have therefore calculated a deficit of 1,180 homes within</p>				

Trowbridge over the plan period up to 2026. It is important to note that PC25 of the Schedule of Proposed changes document highlights a deficit of 1,297 dwellings at Trowbridge which, on review of the evidence base, we have been unable to connect this figure and seek further clarity on this point.

2.2 It is important to note that on behalf of our client Barratt Homes, we have previously engaged with the Wiltshire Housing Site Allocations DPD consultation process and submitted representations to the Pre-submission Consultation which took place between July and September 2017. In addition, discussions with policy officers have taken place to demonstrate the deliverability of land at Elizabeth Way for circa 450 dwellings.

2.3 As this current Schedule of Proposed Changes Consultation is based on whether the Plan is considered to be sound, we have therefore focused this representation to only raise issues based on soundness.

3.0 SOUNDNESS OF THE PLAN

3.1 This section of the representation seeks to review relevant planning policy on a national level relating to the provision for housing, and on this basis, whether the local planning authority has prepared a Local Plan that is sound.

3.2 It is important to raise the point that although the updated NPPF was published in July 2018, the implementation period allows for the previous Framework to be used for those plans submitted for examination before January 2019. Annex 1 Implementation, paragraph 214 of the updated NPPF (2018) states that, "The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019."

3.3 In this case, Wiltshire Council submitted the Sites Allocations DPD plan to the Inspector in August 2018 therefore the previous Framework will still apply. Delivering housing need

3.4 The NPPF (2012) sets out 12 Core Principles which were formed to underpin plan making, one of which is particularly relevant to making provision for housing. This states that planning should, "Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities" (NPPF, para 17)

3.5 Further guidance on the delivery of housing is set out in Para 47 of the NPPF and states, "To boost significantly the supply of housing, local planning authorities should: use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period; identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements..." (NPPF, para 47)

3.6 In terms of Local Plan making it is critical to the success of a plan that the Local Planning Authority positively plan to deliver homes, whilst also allowing for some flexibility. Paragraph 157 of the NPPF states that, "Crucially, Local Plans should: Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this framework." (Paragraph 157)

3.7 The NPPF emphasizes the need for plans to ensure delivery of their strategy for housing and the main way of doing so is the allocation of specific, sustainable and deliverable sites.

Soundness Test

3.8 When assessing whether a plan is considered to be sound, Paragraph 182 of the NPPF identifies the 4 main factors which the LPA need to consider: "A local planning authority should submit a plan for examination which it considers is sound namely that it is: Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; Effective the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework." (NPPF, para 182)

3.9 The deliverability of a Plan features as one of the key tests of soundness and the PINS Procedural Practice in the Examination of Local Plans (June 2016, para 1.1) document stresses this point: "...the plan should focus relentlessly on the critical issues and the strategies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the whole point of the plan is to address the critical issues as far as possible." (Section 1: Pre-submission, Para. 1.1) Achieving appropriate densities

3.10 A critical update included within the revised NPPF (2018) focuses on the importance of making the most efficient use of land. Paragraph 123 of the revised NPPF states that, Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decision avoid homes being built at low densities and ensure that development make optimal use of the potential of each site. In these circumstances: a) Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. 3.11 Although the examination of the plan is based on the old NPPF, this direction of travel as set out within revised national policy needs to be considered through the examination by the Inspector in order for the plan to be sound. The quantum of housing development proposed at Trowbridge is falling increasingly short of the indicative requirement and needs to be addressed if the plan is to succeed.

Deliverability 3.12 The revised 2018 NPPF, sets out the test for determining whether a development site is deliverable. Paragraph 73 of the NPPF states: Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. 3.13 The NPPFs Annex then defines deliverable as: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. 3.14 The emphasis on deliverability within the updated NPPF has changed and has given power to Development Management officers when decided applications, paragraph 76 states; To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing, local planning authorities should also assess why an earlier grant of planning permission for a similar development on the same site did not start. 3.15 We do not consider the Wiltshire Housing Site Allocations Plan to be sound in its current form as it is not positively prepared, justified, effective, nor consistent with national policy on housing delivery and plan making. This plan should be prepared based on the Wiltshire Core Strategy objectives which seeks to meet the objectively assessed housing need by the end of the plan period. 3.16 We set out below the reasons why we consider the draft plan to be unsound in its current form: The plan has not been positively prepared due to the fact that more than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, with a calculated deficit of 1,180 dwellings. At this stage of the plan making process Wiltshire Council should be required to establish how the identified housing need can be met over the plan period, and with regards to Trowbridge Community Area it clearly does not. This proves that the draft proposals have not been consistently prepared using the evidence gathered. The Plan is contradictory to, and does not reflect, the strategy which was set and approved by the Inspector of the Core Strategy in December 2014. The proposed quantum of 355 dwellings currently associated with allocation H2.3, does not meet the full potential capacity of the site, therefore proving that the plan is not justified as it does not make efficient use of land to be allocated through the Site Allocations Plan.

4.0 INDICATIVE HOUSING REQUIREMENT FOR TROWBRIDGE 4.1 The six draft housing allocations identified within Trowbridge will now provide land for approximately 1,050 dwellings. This figure falls significantly short of the updated indicative minimum requirement of 2,230 dwellings set for Trowbridge over the plan period by a total of 1,180 dwellings. It is important to note that PC25 of the Schedule of Proposed changes consultation document highlights a deficit of 1,297 dwellings, we have been unable to reconcile this figure

through the evidence base produced by Wiltshire Council and therefore would like to raise this point to be clarified by the Council. 4.2 The Council have prepared an Addendum report to be read in conjunction with Topic Paper 4 Developing Plan Proposals. The Addendum was produced to review the confirmed 2017 housing land supply position and how this would affect the plan proposals. 4.3 It is important to note that the original purpose of Topic Paper 4 Developing Plan Proposals from the outset was to meet two objectives of the Plan which were: To help demonstrate a rolling five-year supply of deliverable land for housing development; and To allocate sites at the settlement in the County that support the spatial strategy. 4.4 Since the publication of the Pre-submission version of the plan in July 2017, the total amount of dwellings proposed for Trowbridge has not met the indicative requirement set for the area. Although the Schedule of Proposed Changes has increased the capacity of two proposed site allocations (Land at Elizabeth Way and Elm Grove Farm) within Trowbridge, the overall indicative requirement has further increased from 2,050 homes to 2,230 homes, due to the published 2017 housing land supply figures. 4.5 Topic Paper 4 previously identified two reasons for this under provision of housing within Trowbridge: 1. The delay of developing Ashton Park Urban Extension, which was allocated through the Wiltshire Core Strategy for 2,600 dwellings to be built on site within the plan period, up to 2026. It has now resulted in only 1,600 dwellings being built within the plan period and the remaining 1,000 dwellings will be built post 2026. This accounts for 1,000 dwellings out of the 1,220 dwellings shortfall; 2. Inability to identify land free from environmental constraints which could compensate for the consequences of the delay to the Ashton Park development. 4.6 The addendum now states that, the need for detailed Habitats Regulation Assessment, and subsequent bat mitigation strategy have continued to delay delivery of the strategic allocation at Ashton Park, Trowbridge. 4.7 The purpose of the Wiltshire Housing Site Allocations process is to address the shortfall of housing over the remainder of the plan period, up to 2026. Once adopted, the Plan will become an implementation mechanism to the Wiltshire Core Strategy (WCS) and should ensure that the remaining housing requirements set by the WCS are met. Paragraphs 77-79 of the Inspectors Report for the Wiltshire Core Strategy (dated December 2014) referred to Wiltshires Objectively Assessed Need (OAN) being significantly higher than planned for through the Core Strategy, being in the region of +44,000 dwellings, Whilst the achievement of such a figure should be subject to careful monitoring, the evidence indicates the fluctuations that can occur in the delivery of housing but does not conclusively indicate that such a delivery rate cannot be met during the course of the plan period to deliver the significant boost in housing required to go some considerable way to meeting needs. Against this context and mindful of the content of the LDS (partial CS Review), the subsequent intended early review of the CS, the Sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly. (Inspectors Report, Paragraph 80) 4.8 With this in mind, we consider that it is critical that the Wiltshire Housing Site Allocations Plan is positively prepared to allocate sufficient land as required to address the current undersupply of housing within Trowbridge and meet the direction of travel approach now being sought through National Policy. 4.9 The acknowledgement that 1,000 dwellings previously anticipated to be built at Ashton Park will now be delayed until the next plan period is reason to ensure that sufficient flexibility is included through the Site Allocations Plan, Consequently, I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more. (Inspectors Report, Paragraph 81) 4.10 In accordance with Paragraph 47 (bullet point one) of the NPPF (2012) in order for the plan to be sound it must use the baseline evidence gathered to ensure that the full objectively assessed housing needs set out in the Core Strategy are met. This is currently not the case and is demonstrated by the 1,180 dwellings shortfall in Trowbridge. 5.0 FIVE YEAR HOUSING LAND SUPPLY 5.1 The Pre-submission Site Allocations Plan evidence base included Topic Paper 3 Housing Land Supply which demonstrated the Councils land supply position as of June 2017. At this stage of the process the Council had produced an estimated 2017 base position as the 2016/17 annual completions were still being calculated. Since this time, the Council have been able to publish their 2017 housing land supply position (March 2018) which has led to updated indicative requirement figures. 5.2 In order to make the plan sound, the Wiltshire Housing Site Allocations Plan is required to identify sufficient land to meet the overall housing need for Trowbridge. The below table is taken from the Topic Paper 3 addendum report (July 2018) which highlights that following the 2016/17 delivery calculations the indicative requirement for Trowbridge as of 2017 has

increased by 213 dwellings: [TABLE INSERT] 5.3 Wiltshire Council have previously stated that the Liverpool Method appropriately reflects the delivery strategy set out within the Wiltshire Core Strategy for calculating housing supply. The Liverpool method of calculating 5-year supply aims to spread the delivery of housing over the plan period, and not to front-load any under-provision to date. We are of the view that the Sedgfield approach conforms more closely with the requirement to plan positively as it seeks to boost significantly the supply of land for housing in the early part of the plan period. In either method, in order to rectify the current housing shortfall over the remainder of the plan period (up to 2026) the Site Allocations Plan must maximise the identified sustainable development opportunities within Trowbridge, which will in turn help to bolster the housing supply in the area. 5.4 The Topic Paper 3 Addendum report (July 2018) includes table 3.4 (below), which itemises the Councils projected level of housing supply from 2017-2026 for the North and West HMA. As can be seen, it is marginally above 6 years up to 2020/21, when supply then drops to 5.3 years in 2023/2024. [TABLE INSERT] 5.5 On review of the housing trajectory included within the Housing Land Supply Statement published in March 2018 a number of the small sites (less than 10 dwellings) listed within Trowbridge CA considered to be developable within the plan period have permissions dating pre-2015, therefore it would appear to be unclear if these sites will realistically come forward. 5.6 In order to avoid slipping below the 5 years supply the Council need to be more proactive in bringing forward sites early in the plan period. Taking the above into consideration and reviewing the proposed five-year supply figures at Table 3.4 (above) the delivery is only marginally above 5 years, meaning that the plan is not robust or sound in its current form. 5.7 In order to make the plan sound additional evidence needs to be provided as to how the Councils will maintain a 5-year supply. In order to assist them in doing so: Wiltshire Council need to maximize site capacity for the development of housing within each of the identified proposed allocations; Eliminate any small sites which have expired from the 5-year land supply calculations; Ensure that the proposed Allocations are deliverable sites, and able to come forward soon after the adoption of the plan. 6.0 TECHNICAL ISSUES 6.1 The site at Elizabeth Way (Allocation H2.3) encompasses approximately 16.33ha of land and is now proposed to be allocated for a total of 355 dwellings. It is acknowledged that due to the proximity of the site to Hilperton Gap, and the location of the Bradford and Bath Bats SAC to the south of Trowbridge, the site may have constraints which will need to be addressed prior to development. In order to gain a better understanding of these issues Barratt Homes have undertaken various technical assessments on the site, south of Elizabeth Way, which have proven that a higher quantity of housing is possible on the site. 6.2 A Vision Document has been produced, submitted alongside previous representations, which set out the proposed design principles for the site and summarizes the specialist technical input received to date. A summary of the key issues is set out below. Site Boundary 6.3 Since the publication of the Pre-submission Plan the site boundary identified for the proposed allocation at Elizabeth Way was incorrect. Through previous representations and discussions with officers we highlighted that the site boundary identified on the plan did not align with Elizabeth Way Relief Road. From these discussions with Planning Policy Officers we understood that this error would be rectified prior to submission to the Inspector. 6.4 We are in support of the update to the site boundary, which has also been accompanied by the Council proposing that an additional 150 dwellings can be accommodated on the site. Capacity of Site 6.5 The site at Elizabeth Way has been identified for the allocation of 355 dwellings, which is considerably lower than what the site could sustainably deliver. 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<p><b>Supporting documents (Please see Objective)</b></p>	5147790		
<p><b>Does your representation relate to a previous one</b></p>	No, the Proposed Change does not meet a previous objection		

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<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>



<b>Comment ID:</b>	532	<b>Consultee</b> Barratt Homes	<b>Agent</b> Planning Officer Barton Willmore	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 392036	<b>Person ID:</b> 1126545	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
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<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a)				
<b>Please give details of why you support or do not support the updates to the</b>	<b>[REFER TO ATTACHMENT FOR FULL REPRESENTATION]</b>				

**associated evidence documents.**

## **1.0 INTRODUCTION**

1.1 This representation is submitted on behalf of Barratt Homes in respect of their land interests to the south of Elizabeth Way, Trowbridge. It responds to the Focused Consultation on the Schedule of Proposed Changes and evidence base documents which includes updates and addendums to the following; Topic Papers, Technical Reports and Proposed Changes Consultation Documents, and in doing so, outlines how development of the Land at Elizabeth Way would contribute to the achievement of the proposed spatial and sustainability objectives. A location plan for the site has been attached to Appendix 1.

1.2 The Council submitted the draft Wiltshire Housing Site Allocations DPD along with a 'Schedule of Proposed Changes' and supporting evidence to the Secretary of State for independent examination in July 2018. Since this time, Planning Inspector Steven Lee has been appointed to undertake the examination. In August 2018, the Council received a procedural letter from the Inspector requesting Wiltshire Council to undertake consultation on the 'Schedule of proposed changes' as these changes had yet to be consulted upon in public.

1.3 The Representation forms specifically request feedback on whether it is commonly considered that the Site Allocations Plan and evidence base is sound. There is much in the plan that we support, but at present, our response is that the draft Site Allocations Plan is unsound as it has not been positively prepared and is not justified. This is primarily due to the fact that the indicative housing requirement which has been set for Trowbridge has still not been met through the proposed allocations. We have set out our justification for reaching this view in more detail in the following sections.

## **2.0 SUMMARY OF PROPOSED CHANGES TO THE PLAN**

2.1 We have reviewed the 'Schedule of Proposed Changes' relating to the Trowbridge Community Area, and more directly to the proposed allocation at Elizabeth Way, these are set out below:

- 'Historic Landscape Classification' has now been included within the SA assessment tables against SA Objective 6 which has not affected scoring therefore no changes have been made to the Trowbridge assessments in this regard;
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- The Council acknowledge that the proposed allocations through the Site Allocations DPD for Trowbridge are not capable of delivering the full indicative requirement, and instead amount to a total of 1,050 dwellings. We have therefore calculated a deficit of 1,180 homes within Trowbridge over the plan period up to 2026. It is important to note that PC25 of the 'Schedule of Proposed changes' document highlights a deficit of 1,297 dwellings at Trowbridge which, on review of the evidence base, we have been unable to connect this figure and seek further clarity on this point.

2.2 It is important to note that on behalf of our client Barratt Homes, we have previously engaged with the Wiltshire Housing Site Allocations DPD consultation process and submitted representations to the Pre-submission Consultation which took place between July and September 2017. In addition, discussions with policy officers have taken place to demonstrate the deliverability of land at Elizabeth Way for circa 450 dwellings.

2.3 As this current Schedule of Proposed Changes Consultation is based on whether the Plan is considered to be sound, we have therefore focused this representation to only raise issues based on soundness.

### **3.0 SOUNDNESS OF THE PLAN**

3.1 This section of the representation seeks to review relevant planning policy on a national level relating to the provision for housing, and on this basis, whether the local planning authority has prepared a Local Plan that is sound.

3.2 It is important to raise the point that although the updated NPPF was published in July 2018, the implementation period allows for the previous Framework to be used for those plans submitted for examination before January 2019. Annex 1 'Implementation', paragraph 214 of the updated NPPF (2018) states that,

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3.8 When assessing whether a plan is considered to be sound, Paragraph 182 of the NPPF identifies the 4 main factors which the LPA need to consider:

**“A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:**

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.” (NPPF, para 182)

3.9 The deliverability of a Plan features as one of the key tests of soundness and the PINS Procedural Practice in the Examination of Local Plans (June 2016, para 1.1) document stresses this point:

**...“the plan should focus relentlessly on the critical issues and the strategies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the whole point of the plan is to address the critical issues as far as possible.” (Section 1: Pre-submission, Para. 1.1)**

Achieving appropriate densities

3.10 A critical update included within the revised NPPF (2018) focuses on the importance of making the most efficient use of land. Paragraph 123 of the revised NPPF states that,

**“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decision avoid homes being built at low densities and ensure that development make optimal use of the potential of each site. In these circumstances:**

**a) Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate.”**

3.11 Although the examination of the plan is based on the old NPPF, this 'direction of travel' as set out within revised national policy needs to be considered through the examination by the Inspector in order for the plan to be sound. The quantum of housing development proposed at Trowbridge is falling increasingly short of the indicative requirement and needs to be addressed if the plan is to succeed.

Deliverability

3.12 The revised 2018 NPPF, sets out the test for determining whether a development site is deliverable. Paragraph 73 of the NPPF states:

**“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.”**

3.13 The NPPF’s Annex then defines “deliverable” as:

**“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”**

3.14 The emphasis on deliverability within the updated NPPF has changed and has given power to Development Management officers when decided applications, paragraph 76 states;

**“To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing, local planning authorities should also assess why an earlier grant of planning permission for a similar development on the same site did not start.”**

3.15 We do not consider the Wiltshire Housing Site Allocations Plan to be sound in its current form as it is not positively prepared, justified, effective, nor consistent with national policy on housing delivery and plan making. This plan should be prepared based on the Wiltshire Core Strategy objectives which seeks to meet the objectively assessed housing need by the end of the plan period.

3.16 We set out below the reasons why we consider the draft plan to be unsound in its current form:

- The plan has not been positively prepared due to the fact that more than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, with a calculated deficit of 1,180 dwellings. At this stage of the plan making process Wiltshire Council should be required to establish how the identified housing need can be met over the plan period, and with regards to Trowbridge Community Area it clearly does not. This proves that the draft proposals have not been consistently prepared using the evidence gathered.
- The Plan is contradictory to, and does not reflect, the strategy which was set and approved by the Inspector of the Core Strategy in December 2014.
- The proposed quantum of 355 dwellings currently associated with allocation H2.3, does not meet the full potential capacity of the site, therefore proving that the plan is not justified as it does not make efficient use of land to be allocated through the Site Allocations Plan.

#### **4.0 INDICATIVE HOUSING REQUIREMENT FOR TROWBRIDGE**

4.1 The six draft housing allocations identified within Trowbridge will now provide land for approximately 1,050 dwellings. This figure falls significantly short of the updated indicative minimum requirement of 2,230 dwellings set for Trowbridge over the plan period by a total of 1,180 dwellings. It is important to note that PC25 of the 'Schedule of Proposed changes' consultation document highlights a deficit of 1,297 dwellings, we have been unable to reconcile this figure through the evidence base produced by Wiltshire Council and therefore would like to raise this point to be clarified by the Council.

4.2 The Council have prepared an Addendum report to be read in conjunction with Topic Paper 4 'Developing Plan Proposals'. The Addendum was produced to review the confirmed 2017 housing land supply position and how this would affect the plan proposals.

4.3 It is important to note that the original purpose of Topic Paper 4 'Developing Plan Proposals' from the outset was to meet two objectives of the Plan which were:

- To help demonstrate a rolling five-year supply of deliverable land for housing development; and
- To allocate sites at the settlement in the County that support the spatial strategy.

4.4 Since the publication of the 'Pre-submission' version of the plan in July 2017, the total amount of dwellings proposed for Trowbridge has not met the indicative requirement set for the area. Although the Schedule of Proposed Changes has increased the capacity of two proposed site

allocations (Land at Elizabeth Way and Elm Grove Farm) within Trowbridge, the overall indicative requirement has further increased from 2,050 homes to 2,230 homes, due to the published 2017 housing land supply figures.

4.5 Topic Paper 4 previously identified two reasons for this under provision of housing within Trowbridge:

1. The delay of developing Ashton Park Urban Extension, which was allocated through the Wiltshire Core Strategy for 2,600 dwellings to be built on site within the plan period, up to 2026. It has now resulted in only 1,600 dwellings being built within the plan period and the remaining 1,000 dwellings will be built post 2026. This accounts for 1,000 dwellings out of the 1,220 dwellings shortfall;

2. Inability to identify land free from environmental constraints which could compensate for the consequences of the delay to the Ashton Park development.

4.6 The addendum now states that,

**“the need for detailed Habitats Regulation Assessment, and subsequent bat mitigation strategy have continued to delay delivery of the strategic allocation at Ashton Park, Trowbridge.”**

4.7 The purpose of the Wiltshire Housing Site Allocations process is to address the shortfall of housing over the remainder of the plan period, up to 2026. Once adopted, the Plan will become an implementation mechanism to the Wiltshire Core Strategy (WCS) and should ensure that the remaining housing requirements set by the WCS are met. Paragraphs 77-79 of the Inspector’s Report for the Wiltshire Core Strategy (dated December 2014) referred to Wiltshire’s Objectively Assessed Need (OAN) being significantly higher than planned for through the Core Strategy, being in the region of +44,000 dwellings,

**“Whilst the achievement of such a figure should be subject to careful monitoring, the evidence indicates the fluctuations that can occur in the delivery of housing but does not conclusively indicate that such a delivery rate cannot be met during the course of the plan period to deliver the significant boost in housing required to go some considerable way to meeting needs. Against this context and mindful of the content of the LDS (partial CS Review), the subsequent intended early review of the CS, the Sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly.” (Inspectors Report, Paragraph 80)**

4.8 With this in mind, we consider that it is critical that the Wiltshire Housing Site Allocations Plan is positively prepared to allocate sufficient land as required to address the current undersupply of housing within Trowbridge and meet the ‘direction of travel’ approach now being sought through National Policy.



4.9 The acknowledgement that 1,000 dwellings previously anticipated to be built at Ashton Park will now be delayed until the next plan period is reason to ensure that sufficient flexibility is included through the Site Allocations Plan,

**“Consequently, I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more.” (Inspectors Report, Paragraph 81)**

4.10 In accordance with Paragraph 47 (bullet point one) of the NPPF (2012) in order for the plan to be sound it must use the baseline evidence gathered to ensure that the full objectively assessed housing needs set out in the Core Strategy are met. This is currently not the case and is demonstrated by the 1,180 dwellings shortfall in Trowbridge.

## **5.0 FIVE YEAR HOUSING LAND SUPPLY**

5.1 The Pre-submission Site Allocations Plan evidence base included Topic Paper 3 ‘Housing Land Supply’ which demonstrated the Councils land supply position as of June 2017. At this stage of the process the Council had produced an ‘estimated 2017 base position’ as the 2016/17 annual completions were still being calculated. Since this time, the Council have been able to publish their 2017 housing land supply position (March 2018) which has led to updated indicative requirement figures.

5.2 In order to make the plan sound, the Wiltshire Housing Site Allocations Plan is required to identify sufficient land to meet the overall housing need for Trowbridge. The below table is taken from the Topic Paper 3 addendum report (July 2018) which highlights that following the 2016/17 delivery calculations the indicative requirement for Trowbridge as of 2017 has increased by 213 dwellings:

[TABLE INSERT]

5.3 Wiltshire Council have previously stated that the ‘Liverpool Method’ appropriately reflects the delivery strategy set out within the Wiltshire Core Strategy for calculating housing supply. The ‘Liverpool method’ of calculating 5-year supply aims to spread the delivery of housing over the plan period, and not to front-load any under-provision to date. We are of the view that the ‘Sedgefield approach’ conforms more closely with the requirement to plan positively as it seeks to boost significantly the supply of land for housing in the early part of the plan period. In either method, in order to rectify the current housing shortfall over the remainder of the plan period (up to 2026) the Site Allocations Plan must maximise the identified sustainable development opportunities within Trowbridge, which will in turn help to bolster the housing supply in the area.

5.4 The Topic Paper 3 Addendum report (July 2018) includes table 3.4 (below), which itemises the Councils projected level of housing supply from 2017–2026 for the North and West HMA. As can be seen, it is marginally above 6 years up to 2020/21, when supply then drops to 5.3 years in 2023/2024.

[TABLE INSERT]

5.5 On review of the housing trajectory included within the Housing Land Supply Statement published in March 2018 a number of the small sites (less than 10 dwellings) listed within Trowbridge CA considered to be developable within the plan period have permissions dating pre-2015, therefore it would appear to be unclear if these sites will realistically come forward.

5.6 In order to avoid slipping below the 5 years supply the Council need to be more proactive in bringing forward sites early in the plan period. Taking the above into consideration and reviewing the proposed five-year supply figures at Table 3.4 (above) the delivery is only marginally above 5 years, meaning that the plan is not robust or sound in its current form.

5.7 In order to make the plan sound additional evidence needs to be provided as to how the Councils will maintain a 5-year supply. In order to assist them in doing so:

- Wiltshire Council need to maximize site capacity for the development of housing within each of the identified proposed allocations;
- Eliminate any small sites which have expired from the 5-year land supply calculations;
- Ensure that the proposed Allocations are deliverable sites, and able to come forward soon after the adoption of the plan.

## **6.0 TECHNICAL ISSUES**

6.1 The site at Elizabeth Way (Allocation H2.3) encompasses approximately 16.33ha of land and is now proposed to be allocated for a total of 355 dwellings. It is acknowledged that due to the proximity of the site to Hilperton Gap, and the location of the Bradford and Bath Bats SAC to the south of Trowbridge, the site may have constraints which will need to be addressed prior to development. In order to gain a better understanding of these issues Barratt Homes have undertaken various technical assessments on the site, south of Elizabeth Way, which have proven that a higher quantity of housing is possible on the site.

6.2 A Vision Document has been produced, submitted alongside previous representations, which set out the proposed design principles for the site and summarizes the specialist technical input received to date. A summary of the key issues is set out below.

### Site Boundary

6.3 Since the publication of the 'Pre-submission Plan' the site boundary identified for the proposed allocation at Elizabeth Way was incorrect. Through previous representations and discussions with officers we highlighted that the site boundary identified on the plan did not align with

Elizabeth Way Relief Road. From these discussions with Planning Policy Officers we understood that this error would be rectified prior to submission to the Inspector.

6.4 We are in support of the update to the site boundary, which has also been accompanied by the Council proposing that an additional 150 dwellings can be accommodated on the site.

#### Capacity of Site

6.5 The site at Elizabeth Way has been identified for the allocation of 355 dwellings, which is considerably lower than what the site could sustainably deliver. This raises the issue of major under-development of the site which, in combination with the required housing figures, highlights the fact that the current proposed allocation has not been positively prepared or justified.

6.6 Using the evidence gathered by the technical assessments we have calculated that the Barratt site can sustainably accommodate approximately 175 dwellings, which in combination with the current planning application submitted to the west of the site (16/00672/OUT) for 180 dwellings, would equate to 355 dwellings prior to the eastern section of the site allocation even coming forward. Persimmon Homes have submitted earlier representations to suggest that they can deliver circa 150 homes on land to the east of the proposed allocation, meaning that the overall delivery on site could potentially deliver circa 480 dwellings.

6.7 In order to make the plan sound, the allocation for land at Elizabeth Way should be increased to appropriately reflect the true capacity of the site and taking into consideration the NPPF 'direction of travel' approach.

#### Drainage

6.8 From the outset, it was suggested by Wiltshire Council's drainage team that the preparation of a joint drainage strategy would emphasize the deliverability of the site at Elizabeth Way. Since the pre-submission consultation in July 2017, a number of discussions have been undertaken with officers and drainage work has been undertaken which has fed into the design and masterplan of the site.

6.9 The work that has been undertaken to date proves that development of this land to the south of Elizabeth Way offers substantial benefits to both the watercourse and the existing residents along Victoria Road as it will help to safeguard against flooding.

6.10 As you can see from the masterplan (Appendix 2) the incorporation of swales and ponds into the design provides a level of security to residential units in terms of offsetting potential flooding and also providing wildlife habitat, thus softening any impact of new development on a whole.

#### Ecological Constraints

6.11 The ecological investigations, including Badger and Bat surveys, carried out to date have not raised any detrimental issues which would affect the delivery of the site, or preclude the site from development. Walked transect surveys were completed in May and July 2017, with a final survey undertaken in September 2017. Automated detectors were deployed for a period of five nights per month between April and August (inclusive).

6.12 The below table presents the results of the automated detector surveys between April and August 2017 (inclusive). The table includes the total number of passes (B) recorded and average passes per night (B/n) for all species.

[TABLE INSERT]

6.13 Overall, activity appears to be fairly low with the exception of Serotine, which is higher than would be expected, but we do not consider that this matter acts as a constraint to the development of the site.

6.14 The ecological work undertaken by BSG Ecology Ltd. has been used to inform the Concept Masterplan, and this is reflected through the design of open space on site. The Masterplan of the site is attached at Appendix 2.

## 7.0 CONCLUSION

7.1 We support the allocation of 'Policy H2.3' for Land south of Elizabeth Way, but we remain of the view that there are a number of significant issues within the Housing Site Allocations Plan, identified throughout this Representation, that Wiltshire Council need to address.

7.2 The Housing Site Allocation Plan is unsound as it has not been positively prepared and is not justified due to the fact that the indicative housing requirement, which has been set for Trowbridge, has not been met through the proposed allocations. Further to this, the Plan does not propose to make efficient use of land to be allocated, which is unsustainable and not consistent with National Policy.

7.3 Barratt Homes will continue to work with Wiltshire Council and are dedicated to ensuring the deliverability of their site at Elizabeth Way.

7.4 In summary, the plan is unsound in its current form for the following reasons;

- The plan is not positively prepared because more than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, proving that the plan has not been consistently prepared using the evidence gathered.
- The Plan is not justified as it does not propose to make efficient use of land.
- The Plan is contradictory to, and does not reflect, the strategy which was set and approved by the Inspector of the Core Strategy in December 2014.

<b>Supporting documents (Please see Objective)</b>	5147790		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	533	<b>Consultee</b> Barratt Homes	<b>Agent</b> Planning Officer Barton Willmore	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 392036	<b>Person ID:</b> 1126545	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
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**“A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:**

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.” (NPPF, para 182)

3.9 The deliverability of a Plan features as one of the key tests of soundness and the PINS Procedural Practice in the Examination of Local Plans (June 2016, para 1.1) document stresses this point:

**...“the plan should focus relentlessly on the critical issues and the strategies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the whole point of the plan is to address the critical issues as far as possible.” (Section 1: Pre-submission, Para. 1.1)**

Achieving appropriate densities

3.10 A critical update included within the revised NPPF (2018) focuses on the importance of making the most efficient use of land. Paragraph 123 of the revised NPPF states that,

**“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decision avoid homes being built at low densities and ensure that development make optimal use of the potential of each site. In these circumstances:**

**a) Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate.”**

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Deliverability

3.12 The revised 2018 NPPF, sets out the test for determining whether a development site is deliverable. Paragraph 73 of the NPPF states:

**“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.”**

3.13 The NPPF’s Annex then defines “deliverable” as:

**“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”**

3.14 The emphasis on deliverability within the updated NPPF has changed and has given power to Development Management officers when decided applications, paragraph 76 states;

**“To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing, local planning authorities should also assess why an earlier grant of planning permission for a similar development on the same site did not start.”**

3.15 We do not consider the Wiltshire Housing Site Allocations Plan to be sound in its current form as it is not positively prepared, justified, effective, nor consistent with national policy on housing delivery and plan making. This plan should be prepared based on the Wiltshire Core Strategy objectives which seeks to meet the objectively assessed housing need by the end of the plan period.

3.16 We set out below the reasons why we consider the draft plan to be unsound in its current form:

- The plan has not been positively prepared due to the fact that more than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, with a calculated deficit of 1,180 dwellings. At this stage of the plan making process Wiltshire Council should be required to establish how the identified housing need can be met over the plan period, and with regards to Trowbridge Community Area it clearly does not. This proves that the draft proposals have not been consistently prepared using the evidence gathered.
- The Plan is contradictory to, and does not reflect, the strategy which was set and approved by the Inspector of the Core Strategy in December 2014.
- The proposed quantum of 355 dwellings currently associated with allocation H2.3, does not meet the full potential capacity of the site, therefore proving that the plan is not justified as it does not make efficient use of land to be allocated through the Site Allocations Plan.

#### **4.0 INDICATIVE HOUSING REQUIREMENT FOR TROWBRIDGE**

4.1 The six draft housing allocations identified within Trowbridge will now provide land for approximately 1,050 dwellings. This figure falls significantly short of the updated indicative minimum requirement of 2,230 dwellings set for Trowbridge over the plan period by a total of 1,180 dwellings. It is important to note that PC25 of the 'Schedule of Proposed changes' consultation document highlights a deficit of 1,297 dwellings, we have been unable to reconcile this figure through the evidence base produced by Wiltshire Council and therefore would like to raise this point to be clarified by the Council.

4.2 The Council have prepared an Addendum report to be read in conjunction with Topic Paper 4 'Developing Plan Proposals'. The Addendum was produced to review the confirmed 2017 housing land supply position and how this would affect the plan proposals.

4.3 It is important to note that the original purpose of Topic Paper 4 'Developing Plan Proposals' from the outset was to meet two objectives of the Plan which were:

- To help demonstrate a rolling five-year supply of deliverable land for housing development; and
- To allocate sites at the settlement in the County that support the spatial strategy.

4.4 Since the publication of the 'Pre-submission' version of the plan in July 2017, the total amount of dwellings proposed for Trowbridge has not met the indicative requirement set for the area. Although the Schedule of Proposed Changes has increased the capacity of two proposed site

allocations (Land at Elizabeth Way and Elm Grove Farm) within Trowbridge, the overall indicative requirement has further increased from 2,050 homes to 2,230 homes, due to the published 2017 housing land supply figures.

4.5 Topic Paper 4 previously identified two reasons for this under provision of housing within Trowbridge:

1. The delay of developing Ashton Park Urban Extension, which was allocated through the Wiltshire Core Strategy for 2,600 dwellings to be built on site within the plan period, up to 2026. It has now resulted in only 1,600 dwellings being built within the plan period and the remaining 1,000 dwellings will be built post 2026. This accounts for 1,000 dwellings out of the 1,220 dwellings shortfall;

2. Inability to identify land free from environmental constraints which could compensate for the consequences of the delay to the Ashton Park development.

4.6 The addendum now states that,

**“the need for detailed Habitats Regulation Assessment, and subsequent bat mitigation strategy have continued to delay delivery of the strategic allocation at Ashton Park, Trowbridge.”**

4.7 The purpose of the Wiltshire Housing Site Allocations process is to address the shortfall of housing over the remainder of the plan period, up to 2026. Once adopted, the Plan will become an implementation mechanism to the Wiltshire Core Strategy (WCS) and should ensure that the remaining housing requirements set by the WCS are met. Paragraphs 77-79 of the Inspector’s Report for the Wiltshire Core Strategy (dated December 2014) referred to Wiltshire’s Objectively Assessed Need (OAN) being significantly higher than planned for through the Core Strategy, being in the region of +44,000 dwellings,

**“Whilst the achievement of such a figure should be subject to careful monitoring, the evidence indicates the fluctuations that can occur in the delivery of housing but does not conclusively indicate that such a delivery rate cannot be met during the course of the plan period to deliver the significant boost in housing required to go some considerable way to meeting needs. Against this context and mindful of the content of the LDS (partial CS Review), the subsequent intended early review of the CS, the Sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly.” (Inspectors Report, Paragraph 80)**

4.8 With this in mind, we consider that it is critical that the Wiltshire Housing Site Allocations Plan is positively prepared to allocate sufficient land as required to address the current undersupply of housing within Trowbridge and meet the ‘direction of travel’ approach now being sought through National Policy.

4.9 The acknowledgement that 1,000 dwellings previously anticipated to be built at Ashton Park will now be delayed until the next plan period is reason to ensure that sufficient flexibility is included through the Site Allocations Plan,

**“Consequently, I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more.” (Inspectors Report, Paragraph 81)**

4.10 In accordance with Paragraph 47 (bullet point one) of the NPPF (2012) in order for the plan to be sound it must use the baseline evidence gathered to ensure that the full objectively assessed housing needs set out in the Core Strategy are met. This is currently not the case and is demonstrated by the 1,180 dwellings shortfall in Trowbridge.

## **5.0 FIVE YEAR HOUSING LAND SUPPLY**

5.1 The Pre-submission Site Allocations Plan evidence base included Topic Paper 3 ‘Housing Land Supply’ which demonstrated the Councils land supply position as of June 2017. At this stage of the process the Council had produced an ‘estimated 2017 base position’ as the 2016/17 annual completions were still being calculated. Since this time, the Council have been able to publish their 2017 housing land supply position (March 2018) which has led to updated indicative requirement figures.

5.2 In order to make the plan sound, the Wiltshire Housing Site Allocations Plan is required to identify sufficient land to meet the overall housing need for Trowbridge. The below table is taken from the Topic Paper 3 addendum report (July 2018) which highlights that following the 2016/17 delivery calculations the indicative requirement for Trowbridge as of 2017 has increased by 213 dwellings:

[TABLE INSERT]

5.3 Wiltshire Council have previously stated that the ‘Liverpool Method’ appropriately reflects the delivery strategy set out within the Wiltshire Core Strategy for calculating housing supply. The ‘Liverpool method’ of calculating 5-year supply aims to spread the delivery of housing over the plan period, and not to front-load any under-provision to date. We are of the view that the ‘Sedgefield approach’ conforms more closely with the requirement to plan positively as it seeks to boost significantly the supply of land for housing in the early part of the plan period. In either method, in order to rectify the current housing shortfall over the remainder of the plan period (up to 2026) the Site Allocations Plan must maximise the identified sustainable development opportunities within Trowbridge, which will in turn help to bolster the housing supply in the area.

5.4 The Topic Paper 3 Addendum report (July 2018) includes table 3.4 (below), which itemises the Councils projected level of housing supply from 2017–2026 for the North and West HMA. As can be seen, it is marginally above 6 years up to 2020/21, when supply then drops to 5.3 years in 2023/2024.

[TABLE INSERT]

5.5 On review of the housing trajectory included within the Housing Land Supply Statement published in March 2018 a number of the small sites (less than 10 dwellings) listed within Trowbridge CA considered to be developable within the plan period have permissions dating pre-2015, therefore it would appear to be unclear if these sites will realistically come forward.

5.6 In order to avoid slipping below the 5 years supply the Council need to be more proactive in bringing forward sites early in the plan period. Taking the above into consideration and reviewing the proposed five-year supply figures at Table 3.4 (above) the delivery is only marginally above 5 years, meaning that the plan is not robust or sound in its current form.

5.7 In order to make the plan sound additional evidence needs to be provided as to how the Councils will maintain a 5-year supply. In order to assist them in doing so:

- Wiltshire Council need to maximize site capacity for the development of housing within each of the identified proposed allocations;
- Eliminate any small sites which have expired from the 5-year land supply calculations;
- Ensure that the proposed Allocations are deliverable sites, and able to come forward soon after the adoption of the plan.

## **6.0 TECHNICAL ISSUES**

6.1 The site at Elizabeth Way (Allocation H2.3) encompasses approximately 16.33ha of land and is now proposed to be allocated for a total of 355 dwellings. It is acknowledged that due to the proximity of the site to Hilperton Gap, and the location of the Bradford and Bath Bats SAC to the south of Trowbridge, the site may have constraints which will need to be addressed prior to development. In order to gain a better understanding of these issues Barratt Homes have undertaken various technical assessments on the site, south of Elizabeth Way, which have proven that a higher quantity of housing is possible on the site.

6.2 A Vision Document has been produced, submitted alongside previous representations, which set out the proposed design principles for the site and summarizes the specialist technical input received to date. A summary of the key issues is set out below.

### Site Boundary

6.3 Since the publication of the 'Pre-submission Plan' the site boundary identified for the proposed allocation at Elizabeth Way was incorrect. Through previous representations and discussions with officers we highlighted that the site boundary identified on the plan did not align with

Elizabeth Way Relief Road. From these discussions with Planning Policy Officers we understood that this error would be rectified prior to submission to the Inspector.

6.4 We are in support of the update to the site boundary, which has also been accompanied by the Council proposing that an additional 150 dwellings can be accommodated on the site.

#### Capacity of Site

6.5 The site at Elizabeth Way has been identified for the allocation of 355 dwellings, which is considerably lower than what the site could sustainably deliver. This raises the issue of major under-development of the site which, in combination with the required housing figures, highlights the fact that the current proposed allocation has not been positively prepared or justified.

6.6 Using the evidence gathered by the technical assessments we have calculated that the Barratt site can sustainably accommodate approximately 175 dwellings, which in combination with the current planning application submitted to the west of the site (16/00672/OUT) for 180 dwellings, would equate to 355 dwellings prior to the eastern section of the site allocation even coming forward. Persimmon Homes have submitted earlier representations to suggest that they can deliver circa 150 homes on land to the east of the proposed allocation, meaning that the overall delivery on site could potentially deliver circa 480 dwellings.

6.7 In order to make the plan sound, the allocation for land at Elizabeth Way should be increased to appropriately reflect the true capacity of the site and taking into consideration the NPPF 'direction of travel' approach.

#### Drainage

6.8 From the outset, it was suggested by Wiltshire Council's drainage team that the preparation of a joint drainage strategy would emphasize the deliverability of the site at Elizabeth Way. Since the pre-submission consultation in July 2017, a number of discussions have been undertaken with officers and drainage work has been undertaken which has fed into the design and masterplan of the site.

6.9 The work that has been undertaken to date proves that development of this land to the south of Elizabeth Way offers substantial benefits to both the watercourse and the existing residents along Victoria Road as it will help to safeguard against flooding.

6.10 As you can see from the masterplan (Appendix 2) the incorporation of swales and ponds into the design provides a level of security to residential units in terms of offsetting potential flooding and also providing wildlife habitat, thus softening any impact of new development on a whole.

#### Ecological Constraints



6.11 The ecological investigations, including Badger and Bat surveys, carried out to date have not raised any detrimental issues which would affect the delivery of the site, or preclude the site from development. Walked transect surveys were completed in May and July 2017, with a final survey undertaken in September 2017. Automated detectors were deployed for a period of five nights per month between April and August (inclusive).

6.12 The below table presents the results of the automated detector surveys between April and August 2017 (inclusive). The table includes the total number of passes (B) recorded and average passes per night (B/n) for all species.

[TABLE INSERT]

6.13 Overall, activity appears to be fairly low with the exception of Serotine, which is higher than would be expected, but we do not consider that this matter acts as a constraint to the development of the site.

6.14 The ecological work undertaken by BSG Ecology Ltd. has been used to inform the Concept Masterplan, and this is reflected through the design of open space on site. The Masterplan of the site is attached at Appendix 2.

## 7.0 CONCLUSION

7.1 We support the allocation of 'Policy H2.3' for Land south of Elizabeth Way, but we remain of the view that there are a number of significant issues within the Housing Site Allocations Plan, identified throughout this Representation, that Wiltshire Council need to address.

7.2 The Housing Site Allocation Plan is unsound as it has not been positively prepared and is not justified due to the fact that the indicative housing requirement, which has been set for Trowbridge, has not been met through the proposed allocations. Further to this, the Plan does not propose to make efficient use of land to be allocated, which is unsustainable and not consistent with National Policy.

7.3 Barratt Homes will continue to work with Wiltshire Council and are dedicated to ensuring the deliverability of their site at Elizabeth Way.

7.4 In summary, the plan is unsound in its current form for the following reasons;

- The plan is not positively prepared because more than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, proving that the plan has not been consistently prepared using the evidence gathered.
- The Plan is not justified as it does not propose to make efficient use of land.
- The Plan is contradictory to, and does not reflect, the strategy which was set and approved by the Inspector of the Core Strategy in December 2014.

<b>Supporting documents (Please see Objective)</b>	5147790		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	534	<b>Consultee</b> Barratt Homes	<b>Agent</b> Planning Officer Barton Willmore	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 392036	<b>Person ID:</b> 1126545	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Associated evidence documents		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>	Wiltshire Housing Site Allocations Plan Topic Paper 4 Developing Plan Proposals Addendum (July 2018 Submission version) (TOP/04C)				
<b>Please give details of why you support or do not support the updates to the</b>	<b>[REFER TO ATTACHMENT FOR FULL REPRESENTATION]</b>				

**associated evidence documents.**

## **1.0 INTRODUCTION**

1.1 This representation is submitted on behalf of Barratt Homes in respect of their land interests to the south of Elizabeth Way, Trowbridge. It responds to the Focused Consultation on the Schedule of Proposed Changes and evidence base documents which includes updates and addendums to the following; Topic Papers, Technical Reports and Proposed Changes Consultation Documents, and in doing so, outlines how development of the Land at Elizabeth Way would contribute to the achievement of the proposed spatial and sustainability objectives. A location plan for the site has been attached to Appendix 1.

1.2 The Council submitted the draft Wiltshire Housing Site Allocations DPD along with a 'Schedule of Proposed Changes' and supporting evidence to the Secretary of State for independent examination in July 2018. Since this time, Planning Inspector Steven Lee has been appointed to undertake the examination. In August 2018, the Council received a procedural letter from the Inspector requesting Wiltshire Council to undertake consultation on the 'Schedule of proposed changes' as these changes had yet to be consulted upon in public.

1.3 The Representation forms specifically request feedback on whether it is commonly considered that the Site Allocations Plan and evidence base is sound. There is much in the plan that we support, but at present, our response is that the draft Site Allocations Plan is unsound as it has not been positively prepared and is not justified. This is primarily due to the fact that the indicative housing requirement which has been set for Trowbridge has still not been met through the proposed allocations. We have set out our justification for reaching this view in more detail in the following sections.

## **2.0 SUMMARY OF PROPOSED CHANGES TO THE PLAN**

2.1 We have reviewed the 'Schedule of Proposed Changes' relating to the Trowbridge Community Area, and more directly to the proposed allocation at Elizabeth Way, these are set out below:

- 'Historic Landscape Classification' has now been included within the SA assessment tables against SA Objective 6 which has not affected scoring therefore no changes have been made to the Trowbridge assessments in this regard;
- SHLAA site 293 'Land to the east of Elizabeth Way' is to be divided into two parts with the western area to be included as part of the proposed allocation (H2.3) and will help to deliver circa 120 additional dwellings at this location;
- Proposed quantum of Elizabeth Way Site Allocation (H2.3) has increased from 205 dwellings (July 2017), to 355 dwellings (September 2018) due to this additional SHLAA site 293 being introduced;
- Wiltshire Council have published the 2017 Housing Land Supply Statement (March 2018) and released calculations based on the current housing land supply prior to applying the proposed allocations. The indicative residual requirement for Trowbridge, excluding proposed allocations, is now 2,230 dwellings up to 2026. This is an increase from the previous indicative figure of 2,050 dwellings;

- The Council acknowledge that the proposed allocations through the Site Allocations DPD for Trowbridge are not capable of delivering the full indicative requirement, and instead amount to a total of 1,050 dwellings. We have therefore calculated a deficit of 1,180 homes within Trowbridge over the plan period up to 2026. It is important to note that PC25 of the 'Schedule of Proposed changes' document highlights a deficit of 1,297 dwellings at Trowbridge which, on review of the evidence base, we have been unable to connect this figure and seek further clarity on this point.

2.2 It is important to note that on behalf of our client Barratt Homes, we have previously engaged with the Wiltshire Housing Site Allocations DPD consultation process and submitted representations to the Pre-submission Consultation which took place between July and September 2017. In addition, discussions with policy officers have taken place to demonstrate the deliverability of land at Elizabeth Way for circa 450 dwellings.

2.3 As this current Schedule of Proposed Changes Consultation is based on whether the Plan is considered to be sound, we have therefore focused this representation to only raise issues based on soundness.

### **3.0 SOUNDNESS OF THE PLAN**

3.1 This section of the representation seeks to review relevant planning policy on a national level relating to the provision for housing, and on this basis, whether the local planning authority has prepared a Local Plan that is sound.

3.2 It is important to raise the point that although the updated NPPF was published in July 2018, the implementation period allows for the previous Framework to be used for those plans submitted for examination before January 2019. Annex 1 'Implementation', paragraph 214 of the updated NPPF (2018) states that,

**“The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019.”**

3.3 In this case, Wiltshire Council submitted the Sites Allocations DPD plan to the Inspector in August 2018 therefore the previous Framework will still apply.

#### **Delivering housing need**

3.4 The NPPF (2012) sets out 12 Core Principles which were formed to underpin plan making, one of which is particularly relevant to making provision for housing. This states that planning should,

**“Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing,**

**business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities” (NPPF, para 17)**

3.5 Further guidance on the delivery of housing is set out in Para 47 of the NPPF and states,

**“To boost significantly the supply of housing, local planning authorities should:**

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements...” (NPPF, para 47)

3.6 In terms of ‘Local Plan making’ it is critical to the success of a plan that the Local Planning Authority positively plan to deliver homes, whilst also allowing for some flexibility. Paragraph 157 of the NPPF states that,

**“Crucially, Local Plans should:**

- **Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this framework.” (Paragraph 157)**

3.7 The NPPF emphasizes the need for plans to ensure delivery of their strategy for housing and the main way of doing so is the allocation of specific, sustainable and deliverable sites.

Soundness Test

3.8 When assessing whether a plan is considered to be sound, Paragraph 182 of the NPPF identifies the 4 main factors which the LPA need to consider:

**“A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:**

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4.2 The Council have prepared an Addendum report to be read in conjunction with Topic Paper 4 'Developing Plan Proposals'. The Addendum was produced to review the confirmed 2017 housing land supply position and how this would affect the plan proposals.

4.3 It is important to note that the original purpose of Topic Paper 4 'Developing Plan Proposals' from the outset was to meet two objectives of the Plan which were:

- To help demonstrate a rolling five-year supply of deliverable land for housing development; and
- To allocate sites at the settlement in the County that support the spatial strategy.

4.4 Since the publication of the 'Pre-submission' version of the plan in July 2017, the total amount of dwellings proposed for Trowbridge has not met the indicative requirement set for the area. Although the Schedule of Proposed Changes has increased the capacity of two proposed site

allocations (Land at Elizabeth Way and Elm Grove Farm) within Trowbridge, the overall indicative requirement has further increased from 2,050 homes to 2,230 homes, due to the published 2017 housing land supply figures.

4.5 Topic Paper 4 previously identified two reasons for this under provision of housing within Trowbridge:

1. The delay of developing Ashton Park Urban Extension, which was allocated through the Wiltshire Core Strategy for 2,600 dwellings to be built on site within the plan period, up to 2026. It has now resulted in only 1,600 dwellings being built within the plan period and the remaining 1,000 dwellings will be built post 2026. This accounts for 1,000 dwellings out of the 1,220 dwellings shortfall;
2. Inability to identify land free from environmental constraints which could compensate for the consequences of the delay to the Ashton Park development.

4.6 The addendum now states that,

**“the need for detailed Habitats Regulation Assessment, and subsequent bat mitigation strategy have continued to delay delivery of the strategic allocation at Ashton Park, Trowbridge.”**

4.7 The purpose of the Wiltshire Housing Site Allocations process is to address the shortfall of housing over the remainder of the plan period, up to 2026. Once adopted, the Plan will become an implementation mechanism to the Wiltshire Core Strategy (WCS) and should ensure that the remaining housing requirements set by the WCS are met. Paragraphs 77-79 of the Inspector’s Report for the Wiltshire Core Strategy (dated December 2014) referred to Wiltshire’s Objectively Assessed Need (OAN) being significantly higher than planned for through the Core Strategy, being in the region of +44,000 dwellings,

**“Whilst the achievement of such a figure should be subject to careful monitoring, the evidence indicates the fluctuations that can occur in the delivery of housing but does not conclusively indicate that such a delivery rate cannot be met during the course of the plan period to deliver the significant boost in housing required to go some considerable way to meeting needs. Against this context and mindful of the content of the LDS (partial CS Review), the subsequent intended early review of the CS, the Sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly.” (Inspectors Report, Paragraph 80)**

4.8 With this in mind, we consider that it is critical that the Wiltshire Housing Site Allocations Plan is positively prepared to allocate sufficient land as required to address the current undersupply of housing within Trowbridge and meet the ‘direction of travel’ approach now being sought through National Policy.

4.9 The acknowledgement that 1,000 dwellings previously anticipated to be built at Ashton Park will now be delayed until the next plan period is reason to ensure that sufficient flexibility is included through the Site Allocations Plan,

**“Consequently, I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more.” (Inspectors Report, Paragraph 81)**

4.10 In accordance with Paragraph 47 (bullet point one) of the NPPF (2012) in order for the plan to be sound it must use the baseline evidence gathered to ensure that the full objectively assessed housing needs set out in the Core Strategy are met. This is currently not the case and is demonstrated by the 1,180 dwellings shortfall in Trowbridge.

## **5.0 FIVE YEAR HOUSING LAND SUPPLY**

5.1 The Pre-submission Site Allocations Plan evidence base included Topic Paper 3 ‘Housing Land Supply’ which demonstrated the Councils land supply position as of June 2017. At this stage of the process the Council had produced an ‘estimated 2017 base position’ as the 2016/17 annual completions were still being calculated. Since this time, the Council have been able to publish their 2017 housing land supply position (March 2018) which has led to updated indicative requirement figures.

5.2 In order to make the plan sound, the Wiltshire Housing Site Allocations Plan is required to identify sufficient land to meet the overall housing need for Trowbridge. The below table is taken from the Topic Paper 3 addendum report (July 2018) which highlights that following the 2016/17 delivery calculations the indicative requirement for Trowbridge as of 2017 has increased by 213 dwellings:

[TABLE INSERT]

5.3 Wiltshire Council have previously stated that the ‘Liverpool Method’ appropriately reflects the delivery strategy set out within the Wiltshire Core Strategy for calculating housing supply. The ‘Liverpool method’ of calculating 5-year supply aims to spread the delivery of housing over the plan period, and not to front-load any under-provision to date. We are of the view that the ‘Sedgefield approach’ conforms more closely with the requirement to plan positively as it seeks to boost significantly the supply of land for housing in the early part of the plan period. In either method, in order to rectify the current housing shortfall over the remainder of the plan period (up to 2026) the Site Allocations Plan must maximise the identified sustainable development opportunities within Trowbridge, which will in turn help to bolster the housing supply in the area.

5.4 The Topic Paper 3 Addendum report (July 2018) includes table 3.4 (below), which itemises the Councils projected level of housing supply from 2017–2026 for the North and West HMA. As can be seen, it is marginally above 6 years up to 2020/21, when supply then drops to 5.3 years in 2023/2024.

[TABLE INSERT]

5.5 On review of the housing trajectory included within the Housing Land Supply Statement published in March 2018 a number of the small sites (less than 10 dwellings) listed within Trowbridge CA considered to be developable within the plan period have permissions dating pre-2015, therefore it would appear to be unclear if these sites will realistically come forward.

5.6 In order to avoid slipping below the 5 years supply the Council need to be more proactive in bringing forward sites early in the plan period. Taking the above into consideration and reviewing the proposed five-year supply figures at Table 3.4 (above) the delivery is only marginally above 5 years, meaning that the plan is not robust or sound in its current form.

5.7 In order to make the plan sound additional evidence needs to be provided as to how the Councils will maintain a 5-year supply. In order to assist them in doing so:

- Wiltshire Council need to maximize site capacity for the development of housing within each of the identified proposed allocations;
- Eliminate any small sites which have expired from the 5-year land supply calculations;
- Ensure that the proposed Allocations are deliverable sites, and able to come forward soon after the adoption of the plan.

## **6.0 TECHNICAL ISSUES**

6.1 The site at Elizabeth Way (Allocation H2.3) encompasses approximately 16.33ha of land and is now proposed to be allocated for a total of 355 dwellings. It is acknowledged that due to the proximity of the site to Hilperton Gap, and the location of the Bradford and Bath Bats SAC to the south of Trowbridge, the site may have constraints which will need to be addressed prior to development. In order to gain a better understanding of these issues Barratt Homes have undertaken various technical assessments on the site, south of Elizabeth Way, which have proven that a higher quantity of housing is possible on the site.

6.2 A Vision Document has been produced, submitted alongside previous representations, which set out the proposed design principles for the site and summarizes the specialist technical input received to date. A summary of the key issues is set out below.

### Site Boundary

6.3 Since the publication of the 'Pre-submission Plan' the site boundary identified for the proposed allocation at Elizabeth Way was incorrect. Through previous representations and discussions with officers we highlighted that the site boundary identified on the plan did not align with

Elizabeth Way Relief Road. From these discussions with Planning Policy Officers we understood that this error would be rectified prior to submission to the Inspector.

6.4 We are in support of the update to the site boundary, which has also been accompanied by the Council proposing that an additional 150 dwellings can be accommodated on the site.

#### Capacity of Site

6.5 The site at Elizabeth Way has been identified for the allocation of 355 dwellings, which is considerably lower than what the site could sustainably deliver. This raises the issue of major under-development of the site which, in combination with the required housing figures, highlights the fact that the current proposed allocation has not been positively prepared or justified.

6.6 Using the evidence gathered by the technical assessments we have calculated that the Barratt site can sustainably accommodate approximately 175 dwellings, which in combination with the current planning application submitted to the west of the site (16/00672/OUT) for 180 dwellings, would equate to 355 dwellings prior to the eastern section of the site allocation even coming forward. Persimmon Homes have submitted earlier representations to suggest that they can deliver circa 150 homes on land to the east of the proposed allocation, meaning that the overall delivery on site could potentially deliver circa 480 dwellings.

6.7 In order to make the plan sound, the allocation for land at Elizabeth Way should be increased to appropriately reflect the true capacity of the site and taking into consideration the NPPF 'direction of travel' approach.

#### Drainage

6.8 From the outset, it was suggested by Wiltshire Council's drainage team that the preparation of a joint drainage strategy would emphasize the deliverability of the site at Elizabeth Way. Since the pre-submission consultation in July 2017, a number of discussions have been undertaken with officers and drainage work has been undertaken which has fed into the design and masterplan of the site.

6.9 The work that has been undertaken to date proves that development of this land to the south of Elizabeth Way offers substantial benefits to both the watercourse and the existing residents along Victoria Road as it will help to safeguard against flooding.

6.10 As you can see from the masterplan (Appendix 2) the incorporation of swales and ponds into the design provides a level of security to residential units in terms of offsetting potential flooding and also providing wildlife habitat, thus softening any impact of new development on a whole.

#### Ecological Constraints

6.11 The ecological investigations, including Badger and Bat surveys, carried out to date have not raised any detrimental issues which would affect the delivery of the site, or preclude the site from development. Walked transect surveys were completed in May and July 2017, with a final survey undertaken in September 2017. Automated detectors were deployed for a period of five nights per month between April and August (inclusive).

6.12 The below table presents the results of the automated detector surveys between April and August 2017 (inclusive). The table includes the total number of passes (B) recorded and average passes per night (B/n) for all species.

[TABLE INSERT]

6.13 Overall, activity appears to be fairly low with the exception of Serotine, which is higher than would be expected, but we do not consider that this matter acts as a constraint to the development of the site.

6.14 The ecological work undertaken by BSG Ecology Ltd. has been used to inform the Concept Masterplan, and this is reflected through the design of open space on site. The Masterplan of the site is attached at Appendix 2.

## 7.0 CONCLUSION

7.1 We support the allocation of 'Policy H2.3' for Land south of Elizabeth Way, but we remain of the view that there are a number of significant issues within the Housing Site Allocations Plan, identified throughout this Representation, that Wiltshire Council need to address.

7.2 The Housing Site Allocation Plan is unsound as it has not been positively prepared and is not justified due to the fact that the indicative housing requirement, which has been set for Trowbridge, has not been met through the proposed allocations. Further to this, the Plan does not propose to make efficient use of land to be allocated, which is unsustainable and not consistent with National Policy.

7.3 Barratt Homes will continue to work with Wiltshire Council and are dedicated to ensuring the deliverability of their site at Elizabeth Way.

7.4 In summary, the plan is unsound in its current form for the following reasons;

- The plan is not positively prepared because more than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, proving that the plan has not been consistently prepared using the evidence gathered.
- The Plan is not justified as it does not propose to make efficient use of land.
- The Plan is contradictory to, and does not reflect, the strategy which was set and approved by the Inspector of the Core Strategy in December 2014.

<b>Supporting documents (Please see Objective)</b>	5147790		
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	535	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1188071	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC93				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			



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The village is carrying out its own Neighbourhood Plan which will set out the plans for the village, not this Plan. Effective - Large developments at "Large Villages" are less effective in delivering the needs of people moving to the area who require housing where there are employment opportunities. Consistent with national policy - Large scale housing developments in "Large Villages" are not promoted by National Policy. It is disappointing that, having consulted us once, you have ignored the comments made on your previous proposal and have now increased the number of houses that are planned for Bratton. No reasonable person would argue against a few houses say 15 but your proposition needs considerations into the issues surrounding it. When discussing Bratton, what is happening in Westbury must be taken into account since Bratton is part of the infra-structure supporting Westbury. 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<b>Identify Proposed Change Reference Number</b>	PC94				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Positively prepared - Development requirements have not been objectively analysed. Westbury Town has an excess of 291 houses against the plan, resulting in the Westbury Community Area being over provisioned by 245 houses. There is no requirement for further allocations.</p> <p>Justified - Development of Site 738 and Site 321 are non-compliant with the Core Strategy, Core Policy 1, Clause 4.15 which states: At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. The reduction of 5 houses in PC 94 does not cancel the following points. Site 738 and Site 321 individually exceed the housing needs requirement of the village (8 houses were required at the last survey) and are therefore non-compliant with Core Strategy, Core Policy 1 which states: Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. The Council has made errors in the assessment of Bratton as a "Large Village" by counting 2 Recreation Fields, 1 Children's Play Area and 1 Sports Pitch as facilities. However, there is in fact only 1 Recreation Field which includes a small Children's Play area and 1 Sports Pitch. Both sites are considered "modest" development but this is assessed against an incorrect figure of 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Bratton has experienced growth of 26 houses, or 5.1%, in the last 10 years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. Neither development complies with the statements of EXAM/ 02A (WHSAP Sustainability Appraisal Sept 2018), under the title 'Education and Skills', states that 'Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work.' and under the title 'Economy and Enterprise', states that 'Housing development should be located in close proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport . The latest statistics for cars per household indicate 1.76 for rural locations, which will lead to increased traffic, more out-commuting, vehicle noise and pollution. Community speed watch data shows traffic through Bratton has doubled in the last 3 years. On some days more than 400 vehicles in a hour. Both developments will alter the entrance to the village due to their size and will result in the loss of the rural nature of the village on the western edge, creating a suburban view. Site 738 would alter and harm the views and landscapes of the Village, the slopes of the Salisbury Plain and the White Horse and Bratton Camp hillside. Proposed landscaping with trees and shrubs conflicts with the wide open expanses of the hillside at this part of the Special Landscape Area and Salisbury Plain SPA (Special Protection Area). Existing Pedestrian and bicycle access to the centre of the village along Westbury Road and its pavement</p>			

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<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	537	<b>Consultee</b> Castlewood Properties Ventures Ltd	<b>Agent</b> Senior Planner Turley	<b>Do you consider the Proposed Change to be legally compliant?</b>	Yes
		<b>Person ID:</b> 1137984	<b>Person ID:</b> 1130975	<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	(1) Positively prepared; Justified; Effective; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	PC51				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Introduction On behalf of our client, Castlewood Properties Ventures Ltd. (hereafter referred to 'Castlewood'), we write to provide representations to the "Focussed consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan" (WHSAP). We are responding to this consultation in respect of our client's land interest at Land off the A363 at White Horse Business Park Trowbridge, which is proposed allocation H2.2 in the Wiltshire Housing Site Allocations Plan (WHSAP). Castlewood are local developers who can provide greater certainty of delivery, and have a strong track record in delivering development in Wiltshire. We comment specifically in respect of the proposed amendments relating to proposed allocation H2.2, namely PC59 and PC60 and their consequential changes (PC13, PC15, PC17, PC21, PC22, PC25, PC51, PC56). In summary, these proposed amendments seek to reduce the capacity of proposed allocation H2.2 to 'approximately 175 dwellings'. This follows a decision by the Council's Cabinet, relating to perceived coalescence between the proposed allocation site and the village of North Bradley. We consider this in detail in these Representations. These Representations should be viewed alongside the 'Land off the A363 at White Horse Business Park' Vision Document prepared by Tur1ey (November 2018). These Representations should also be read in combination with those from parties who also have an interest in the H2.2 site, on land to the south of Castlewood's parcel.</p> <p>Proposed H2.2 Allocation The Proposed Allocation site H2.2 comprises 18.96ha and extends from Bradley Road at the north to Westbury Road at the south. There are several land interests relating to Proposed Allocation H2.2. Castlewood's interests relate to a 8.37ha parcel at the northern end of the allocation site, closest to the Trowbridge settlement. This northern parcel of land (hereafter referred to 'The Site') is identified in the accompanying Vision Document, The Site fronts onto A363 where the proposed access is to the residential development is to be secured. Trowbridge is a Principal Settlement, situated within the Trowbridge Community Area and located in the North and West Wiltshire Housing Market Area (HMA). Therefore the scope of these representations is focused on the proposed strategy for the North and West Wiltshire HMA, the Trowbridge Community Area and Trowbridge specifically. Previous Representations on behalf of Castlewood were submitted to the Council in September 2017, in response to the WHSAP Pre-Submission consultation, and in February 2018 to provide the Council with an indicative illustrative layout. The following technical reports were all submitted in February 2018 to demonstrate that there are no significant constraints to delivery of residential development in the site: - Baseline Landscape and Visual Appraisal (referred to hereafter as LVA); LVIA Constraints and Opportunities Plan - Flood Risk and Surface Water Drainage Technical Note; - Highways and Transport Technical Note; - Heritage Technical Note; It is not the intention of these Representations to repeat information previously provided, rather to respond to the key changes proposed by this latest consultation. These representations are supported by the following documents, which provide further</p>				

technical information demonstrating the capability of the Proposed Allocation to deliver at least 300 dwellings, of which around 140 dwellings can be provided on the Site: - Land off the A363 at White Horse Business Park Vision Document, prepared by Turley (November 2018) - Ecology Technical Note (November 2018), prepared by Nicholas Pearson Associates. The Ecology Technical Note discusses the ecological considerations which have informed the masterplan, and demonstrates that there are no ecological considerations which do not preclude development of the Site for approximately 140 dwellings, including the need for buffers to be retained as dark corridors. WHSAP Proposed Changes. With respect to the document EXAM0101 Schedule of Proposed Changes (September 2018), the key changes related to the Proposed Allocation are as follows: - PC59 - Amend the boundary of the allocation as set out in Annex C; And first sentence of paragraph 5.52 to read: "Approximately 25.62 18.96 ha of land off the A363 southwest of the White Horse Business Park is allocated for the development" - PC60 - Amend first sentence of paragraph 5.52 as follows: "land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 225 175 dwellings, as identified on the Policies Map." We do wish to object to PC60. This reduction in dwelling numbers is unjustified, and indeed the allocation quantum should be increased to "at least 300 dwellings", based on the technical evidence and other considerations, such as Trowbridge's identified shortfall. The Representation will set out the justification for this. We note that the Council's evidence base has been updated in respect of: - Wiltshire Housing Site Allocations Plan Sustainability Appraisal Revised September 2018 (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C); - Update to the Wiltshire Housing Site Allocations Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03); - Wiltshire Housing Site Allocations Plan Community Area Topic Paper Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a); The Community Area Topic Paper Trowbridge has been amended in relation to site ref. 298 (The Proposed Allocation). The amendments are as follows: Whilst this site is not without constraint (including potential effects on protected bat species and the significance of heritage assets), these can be mitigated through on-site measures. To address these matters as a result in any development scheme on the allocation would not involve the whole SHLAA site option but would nonetheless need to deliver all necessary mitigation. Therefore, the potential dwelling capacity stated in the SHLAA/SHELAA would be reduced to approximately 150 175 dwellings (para 5.24, pg 22). This amendment is not supported by the technical information submitted with our previous representations nor the ecology technical note accompanying this Representation. As set out above, the ecological technical note concludes there are no ecological considerations which preclude development of the Site alone for approximately 140 dwellings, including the need for buffers to be retained as dark corridors in respect of the protected bat species. In relation to heritage assets, there are no listed buildings on the Site itself and the Masterplan identifies that appropriate provision can be made for the setting of listed buildings in the vicinity whilst providing c.140 units on the Site, with the remainder of the c.300 units to be provided on the remaining parts of the Proposed Allocation. It should also be noted that the Community Area Topic Paper has also been amended in relation to the immediately adjacent Elm Grove Farm Proposed Allocation. Ecology (protected bat species) and heritage assets are again raised as a potential constraint, however conversely for this site the amendment concludes that these matters can be mitigated through on-site measures and the site's capacity increased. No clear explanation appears to have been provided for the different approach between the sites. It is noted that some of the documents which our previous representations and technical documents commented on, such as the Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 2 (June 2017) (WHSAP/20), have not been updated for the purposes of this consultation. We do not seek to repeat comments previously made in relation to these documents, and would refer you to our previous Representations. In respect of technical considerations we note that the only amendment to the Council's Sustainability Assessment in respect of Proposed Allocation H2.2 (site ref. 298) is in respect of heritage considerations: The Grade II Listed Kings Farmhouse (and its setting), Willow Grove, monuments and gateway to former Baptist Church and Little Common Farm are situated within the site area, and important heritage farmsteads are situated to the north and south of the site. A detailed heritage assessment (building upon the high-level Heritage Impact Assessment prepared by the Council) would be required to support any subsequent planning application. A Heritage Impact Assessment would be required. Archaeological potential of the site is

medium and therefore archaeological assessment would be required (SA Obj. 6). We can confirm that we have no objections to this amended text. It is acknowledged that heritage will be an important consideration for the Proposed Allocation, albeit of less significance to the Site given the location of the Listed Buildings, outwith the Castlewood land interests. Background to Allocation By way of background, the site was submitted to the SHLAA and was assessed under site reference 298. The site passed stage 4a with a stated capacity of 338 dwellings and was progressed as a 'preferred site', however the stated capacity was reduced to 150 dwellings (WHSAP Trowbridge Community Area Topic Paper July 2018, page 18). The assessment of site options (Appendix G) explains this reduction stating "mitigation measures required to address effects on heritage assets, ecology and landscape would result in a reduction to the developable area of the site and a potential reduction in dwelling capacity." (WHSAP Trowbridge Community Area Topic Paper July 2018, page 97). This resulted in the Pre-Submission Draft WHSAP (September 2017) consultation including the site as an allocation for "approximately 150 dwellings" under site reference H2.2. The pre-submission draft was subject to a period of public consultation and subsequent to this consultation, the Council proposed to increase the capacity of the site. This amendment to proposed allocation H2.2 was originally set out in the Council's Cabinet Papers of 15th May 2018, which refer to a capacity increase from approximately 150 to 300 dwellings (Council's Cabinet Papers of 15th May 2018, pages 294, 365). [It is noted that there are inconsistencies in the Council's Cabinet Papers of 15th May 2018, as there is also reference to an increase to 225 dwellings.] This demonstrates that the Council consider that a capacity of approximately 300 dwellings was appropriate for the H2.2 allocation site. The WHSAP was subsequently deferred from consideration at the 15th May 2018 Cabinet meeting to be heard at the 3rd July 2018 Cabinet instead. It is understood this was to allow further consultation on the proposed changes with Wiltshire Councillors and town and parish councils (Minutes of 3rd July 2018 Cabinet, paragraph 257). For the Cabinet Papers of 3rd July 2018, the Council prepared an Addendum following the deferral of the item from Cabinet of 15 May 2018. This Addendum refers to a smaller capacity increase for allocation H2.2 from approximately 150 to 225 dwellings.. At the 3rd July 2018 Cabinet, Cllr Sturgis proposed further changes to the in response to the housing numbers on the Allocation site, understood to be in response to consultation with Wiltshire Councillors and town and parish councils. The following change was proposed: (c) Amend Proposed Change 39 (site allocation H2.2, land off the A363 at White Horse Business Park, Trowbridge) to reduce the proposed dwelling increase by 50 dwellings This proposed change had the effect of reducing the capacity increase further from approximately 150 to 175 dwellings. The minutes of the 3rd July 2018 Cabinet meeting provide further insight into Member's justification for this change: In justifying the further proposed changes, Cllr Sturgis referred to the addendum, and provided clarification as follows ... the reduction in the increase in housing numbers on site H2.2 would provide for landscape buffer for North Bradley. In response to concerns raised by David Feather that insufficient weight had been given to North Bradley's Neighbourhood Plan, Councillor Sturgis stated that other neighbourhood plans were further 'forward, and could therefore be given greater weight. Councillor Sturgis went on to say that: he hoped that the proposed amendments to the White Horse business park site would go some way to maintaining a gap between North Bradley and Trowbridge; and that Wiltshire Council would continue to work to support the North Bradley neighbourhood plan so that it would be better progressed by the time of the examination in public. The issue of alleged coalescence between the Trowbridge and North Bradley settlements is therefore identified to be one of the key issues from the Council's perspective relating to the Proposed Allocation's capacity. It is noted that the Community Area Topic Paper raises concerns regarding ecological (bat species) and heritage constraints, which would require mitigation in order to be satisfactorily addressed. We dispute the Council's concerns regarding the perceived coalescence of Trowbridge and North Bradley, and the limit on capacity created by the ecological and heritage constraints. For the reasons we will set out below we consider the Council's approach to reducing the overall dwelling capacity on site H2.2 to be unsound. The capacity of proposed allocation H2.2 should be reinstated as approximately 300 dwellings, as per the previous view of Planning Officers. Representations We fervently disagree with the Council's position, that the Proposed Allocation is only capable of accommodating approximately 175 dwellings, in order to maintain a gap between the North Bradley and Trowbridge settlements, and provide appropriate mitigation. Our evidence base (and supported by the representations prepared by Linden Homes in relation to a separate parcel of the Allocation Site) supports a higher capacity. Crucially, the Council's own evidence base supports a higher capacity. For example, the WSHAP



Stage 4a Site Landscape Assessment concludes that the capacity of the Site to accommodate change is described as 'moderate-high', This is discussed further below. We feel that the Proposed Allocation is capable of accommodating at least 300 dwellings, without causing issues of coalescence with the North Bradley settlement. Specifically to these Representations, we feel that the Site (the northern parcel of land defined in the accompanying Vision Document) is capable of accommodating approximately 140 dwellings, again without causing issues of coalescence and provide adequate mitigation. This is now considered in full.

**Background on Relationship to Trowbridge** The Site is in close proximity to the existing settlement boundary of Trowbridge to the north (as defined by the Core Strategy 2015, fig 1), less than 50m to the south of the existing boundary. As part of the WHSAP, the Council are undertaking a settlement boundary review (WHSAP Topic Paper 1 Settlement Boundary Review Methodology, refers). This Topic Paper concludes that the White Horse Business Park to the east of the site meets the methodology for being included within the settlement. [MAP INSERT] Accordingly the Draft WHSAP proposes to include White Horse Business Park within the settlement boundary (fig 2). As a result, in addition to being in close proximity to the existing settlement boundary of Trowbridge to the north, the Site also abuts the proposed settlement boundary of Trowbridge - in its extended form - to the east (as defined by the Draft WHSAP, fig 2). The Site therefore relates well to the Trowbridge settlement and in combination with proposed housing allocation 'Elm Grove Farm', would enhance connectivity between the existing Trowbridge settlement and the established White Horse Business Park. Indeed delivery of residential development on the Allocation Site would bridge the separation between the business park and the wider settlement. The potential of the Allocation Site and the adjacent Elm Grove Farm allocation to be successfully integrated into existing and planned developments in the area, while maintaining a defensible buffer to North Bradley is recognised in the Trowbridge Community Area Topic Paper. The relationship between White Horse Business Park, the Proposed Allocation (ref 298) to the SW and proposed allocation 'Elm Grove Farm' (ref 613/248) to the SE is demonstrated in fig 2. The Site is ideally placed to provide improvements to walking and cycling routes through to the town, and the proposed masterplan shows how these improved linkages can be delivered as part of a residential development. The Proposed Allocation would therefore provide a cohesive and logical extension to Trowbridge. It should be noted that the Site would be directly connected to the settlement to the north and east, and would very much look to the north and Trowbridge in terms of connectivity and access to facilities.

**[MAP INSERT] Landscape Evidence and Design Solution** The previous Representations submitted to the Council on behalf of Castlewood in February 2018 provide the Council with an indicative illustrative layout and a Landscape and Visual Appraisal which concludes that there are no significant constraints to the delivery of residential units on the site. The LVA concludes that visually, the Site is relatively well contained on account of the existing hedgerow structure, generally flat topography, the surrounding mature tree belts and surrounding development. The visibility of the site is limited to occasional short distance views from immediate visual receptors. In the wider surrounding landscape, the cumulative effect of field boundary hedgerows and the flat low lying topography provide visual containment. Although, the site is likely to be glimpsed from raised land to the southeast, the intervening distance will prevent its features being discernible. The Site therefore has low visual prominence. There are strong landscape buffers on the edge of North Bradley and the development provides opportunities to reinforce existing landscape features. This will lead to a softening of views towards Trowbridge from North Bradley, especially as the existing settlement edge of Trowbridge is defined by commercial development and the proposed development will provide a softer, more permanent edge. The LVA acknowledges that whilst there would be some physical reduction in the separation between Trowbridge and North Bradley as a result of the Proposed Allocation, the visual effects could be minimised and mitigated. The proposed Masterplan provided in the accompanying Vision Document incorporates such mitigation measures, including:

- The LVA acknowledges that a visual break is experienced between the settlements of Trowbridge and North Bradley when travelling along Woodmarsh. Accordingly the masterplan has not identified development in those areas most significant to the perceived visual separation between North Bradley and Trowbridge, as informed by the LVA. This preserves the setting of North Bradley village and its integrity.
- The northern development parcel is set back considerably from Woodmarsh to reinforce the visual separation from North Bradley and it is proposed that the development in this area will generally be of lower density so as to set the proposed development within a landscape context and that the built form is more visually connected to the south of Trowbridge and visually

buffer the scheme from North Bradley. - The proposed masterplan proposes to implement significant new planting along the south-western boundary, in addition to significant existing planting to reinforce the visual separation between the proposed development and North Bradley. The LVA confirms that the development of the site could be achieved without resulting in significant landscape and/or visual impacts (in relation to the receptors identified in the LVA including the A363, Woodmarsh and residential properties on the eastern edge of North Bradley). In addition, the findings of the Council's own evidence base are significant. The WHSAP Stage 4a Site Landscape Assessment (June 2017) concludes that the overall magnitude of effect on views if the site were to be developed is identified as 'low adverse'. The capacity of Site 298 to accommodate change is described as 'moderate-high'. It is considered, therefore, that the site should be allocated for a much higher number of dwellings given the sustainable location and absence of any constraints which cannot be mitigated against. The overall effect will be to proportionately increase the quantum of market and affordable dwellings, which can be achieved through the Proposed Allocation, whilst simultaneously protecting the integrity of North Bradley as a village. Indeed, the opportunity to achieve a comprehensive design will provide greater opportunities for more meaningful green infrastructure provision, landscaping and open space. In summary, we contend that delivery of approximately 300 dwellings on the Proposed Allocation would not lead to unacceptable coalescence between Trowbridge and North Bradley. Residential development on the site would link, both visually and physically, primarily with Trowbridge and the adjacent White Horse Business Park, which is proposed in the WHSAP to form part of the Trowbridge settlement boundary. As demonstrated in the accompanying Vision Document, development on the site would be sensitively designed with the incorporation of new or strengthened landscape buffers and careful siting of built form to protect visual separation between the two settlements. Utilising the approach set out in the Vision Document, the Site could accommodate c. 140 units, as part of a wider 300 unit allocation.

**Housing Need** As a Principal Settlement, Trowbridge is a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026 and beyond. There are, however, severe constraints to the growth of Trowbridge. In particular, with Green Belt and Flood Zone designations to the north and west of Trowbridge (Fig 3), opportunities to expand Trowbridge in order to accommodate the identified housing need are limited. In proposing the allocation of this site, the Council identified that development of the site for housing would contribute to the area strategy for the town by boosting the supply of homes to help meet indicative requirements" [MAP INSERT] In the context of Trowbridge being a focus for growth and taking a large proportion of housing need, we wish to comment on PC25, which is a factual update to reflect the latest published Housing Land Supply Statement (March 2018) and to reflect PC55, PC60, PC64 and PC70 that propose higher densities on site allocations to make best use of land. PC25 relates to the following amended paragraph: Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 1,050 dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220 1,297."

In addition, related to the Trowbridge Community Area, the Council's Housing Land Supply Statement Addendum July 2018 Submission Version (ref: TOP/03C) indicates there is still an indicative residual requirement for the remainder of the Trowbridge Community Area of at least 2,230 dwellings during the remainder of the Plan period up to 2026. As things stand therefore the Council are not National planning policy is clear that the Council must look at its residential allocations beyond five years to ensure there is a consistent pipeline for bringing forward new residential development. The Council, despite the amendments, acknowledge that housing development at Trowbridge will fall short of the requirements. By failing to allocating sufficient quantum of new housing in the WHSAP, the Council is currently failing to fully meet its identified housing needs. The Plan has not therefore been positively prepared. To ensure a sound Plan, which is consistent with national planning policy, it is essential that either: a) additional site are identified and allocated; or b) greater quantum of housing is allocated on existing/ proposed allocations. In relation to option a), as set out above Trowbridge lacks genuine, alternative options to extend the settlement due to constraints, including Green Belt designations and Flood Zone primarily to the north and west. Consideration should therefore be given to intensify allocations proposed by the WHSAP, where technical constraints do not preclude this. As has been demonstrated by these Representations,

	<p>and in those previously submitted, there are no technical constraints which preclude a greater quantum of development than currently proposed in the WHSAP. Indeed, the Council have previously identified the potential of this site to accommodate c 300 dwellings, and the proposed reduction to 175 to accommodate ecology and heritage mitigation measures is unjustified. The technical work undertaken, and submitted to the Council during the WHSAP process demonstrate that the Proposed Allocation is capable of accommodating at least 300 dwellings with the incorporation of necessary mitigation measures. The sustainability appraisal undertaken by the Council identify the Proposed Allocation as a 'more sustainable' site. As such, priority should be maximising the housing numbers on this site in the first instance to address the outstanding house requirement, rather than looking towards 'less sustainable sites. Conclusion In summary, it is contended that proposed modification PC60 (and its consequential changes) to the WHSAP render the document unsound and contrary to paragraph 182 of the NPPF (2012). The proposed modification is inconsistent with the technical information provided to the Council, and the Council's own evidence base documents, which recognises the capability of the Proposed Allocation to accommodate a greater quantum of residential units whilst still maintaining appropriate separation between Trowbridge and North Bradley and providing adequate mitigation. The reduction in dwelling numbers for Proposed Allocation H2.2 does not represent positive preparation of the WHSAP. There is an identified housing need in the Trowbridge Community Area and the WHSAP as currently proposed does not meet the full requirement. It is recognised that mitigation will be required in relation to heritage and ecology matters, however the technical work undertaken has identified that appropriate mitigation can be accommodated with a greater quantum of dwellings than 175. Indeed, the accompanying Vision Document relating specially to our client's interests on the north parcel, identifies around 140 dwellings can be appropriately accommodated on that part of the allocation alone. In order to remedy this and make the WHSAP sound, we request that the capacity of the Proposed Allocation H2.2 is reinstated as "at least 300 dwellings", and consequential changes subsequently amended. Specifically to these Representations, we request that recognition is given to the capability of the Site to accommodating approximately 140 dwellings as part of the H2.2 allocation. In order to effectively put this case before the Inspector and address any questions they may have and to also rebuff any argument the Council may make for proceeding with proposed modification PC60 and its consequential changes we consider it necessary to attend the Examination Hearings in a speaking capacity. For reference, we append a full set of additional details as follows. These reports and drawings concern the proposed development of the Site and provide information regarding constraints: Vision Document Ecology Technical Note Flood Risk &amp; Drainage Technical Note Heritage Technical Note Highways Technical Note Landscape and Visual Appraisal</p>		
<p><b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>	<p>No, the Proposed Change does not meet a previous objection</p>		
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>	<p>Yes</p>	<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	<p>Yes</p>

<b>Comment ID:</b>	538	<b>Consultee</b> Area Planner Canal & River Trust	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1069602		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [General]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Thank you for consulting the Canal & River Trust on the Schedule of Proposed Changes to the Plan, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum and associated evidence documents. The Trust has no comments to make at this time.				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		
<b>Supporting documents (Please see Objective)</b>					

<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	539	<b>Consultee</b> Team Leader - Planning Policy Bath & North East Somerset Council	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 558939		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	N/A [DtC]				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Further to our conversation and your email please find below the B&amp;NES Council officer response to consultation on the proposed changes to the Wiltshire Housing Site Allocations Plan. I trust that these comments are helpful, but please let me know if you have any queries. B&amp;NES Council and Wiltshire Councils engaged meaningfully on the preparation of their respective adopted Core Strategies. Both documents had complimentary spatial strategies that sought to stabilise commuting flows, that result in a net flow of residents from the North &amp; West Wiltshire HMA to work in Bath. The Wiltshire Housing Site Allocations Plan has been prepared in the context of and to deliver the Wiltshire Core Strategy. It is noted that in the proposed changes that are currently subject to consultation that some amendments to the housing capacity figures for allocated sites within these areas, including Trowbridge (which has a close relationship with Bath) are proposed. The overall effect of the proposed changes does not alter the fact that within North &amp; West Wiltshire HMA the site allocations will enable delivery of the housing requirement established in the Core Strategy. Given this Councils agreement with the spatial strategy set out in the Wiltshire Core Strategy there are no outstanding issues or concerns to B&amp;NES Council related to the Housing Site Allocations Plan. Therefore, it is also confirmed that it is not considered necessary to prepare a Statement of Common Ground (as referenced in the NPPF, para 27) beyond what is being prepared for the West of England Joint Spatial Plan. B&amp;NES Council looks forward to engaging with Wiltshire Council on its Core Strategy review and the preparation of the B&amp;NES Local Plan covering the period from 2016 to 2036. This will entail a review of the position on Statements of Common Ground.</p>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Comment ID:</b>	541	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187791	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC3				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[OBJECTION TO PC3, SET OUT IN FULL IN ATTACHMENT. LAND EAST OF LAVINGTON SCHOOL IS IDENTIFIED AND ASSESSED POSITIVELY IN THE EMERGING NEIGHBOURHOOD PLAN. WILTSHIRE COUNCIL'S ASSESSMENT RECOGNISES THE SITE IS DEVELOPABLE AND DELIVERABLE]				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5153578</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	542	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187791	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC48				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	[OBJECTION TO PC48, SET OUT IN FULL IN ATTACHMENT. LAND EAST OF LAVINGTON SCHOOL IS IDENTIFIED AND ASSESSED POSITIVELY IN THE EMERGING NEIGHBOURHOOD PLAN. WILTSHIRE COUNCIL'S ASSESSMENT RECOGNISES THE SITE IS DEVELOPABLE AND DELIVERABLE]				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		

<p><b>Please state which evidence document this representation relates to:</b></p>		<p><b>Please give details of why you support or do not support the updates to the associated evidence documents.</b></p>	
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5153578</p>		
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	

<b>Comment ID:</b>	546	<b>Consultee</b> Hallam Land Management/Velcourt Limited	<b>Agent</b> <b>Person ID:</b> 1013209	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1146294		<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>		Associated evidence documents	<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Justified; Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>					
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>		Wiltshire Housing Site Allocations Plan Heritage Impact Assessment Final Report Prepared by LUC (March 2018) (WHSAP/05)	<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>	PC110 Hallam Land Management Limited and Velcourt Limited objected to the principle of the Rowbarrow housing allocation (Policy H3.4) and PC110 confirms the concerns raised relating to heritage matters are clear material considerations, specifically the i	

<b>Supporting documents (Please see Objective)</b>			
<b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b>			
<b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b>	Yes	<b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b>	Yes

<b>Comment ID:</b>	548	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187736	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC54				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Petition to fight against the proposals for the Queen Elizabeth II Field. [A total of 348 signatures have been collected].</p> <p>Reasons why we need to fight the proposals.</p> <ol style="list-style-type: none"> <li>1). The loss of our only green area, for children to play, people exercising and dog walkers to use.</li> <li>2). The field became part of a legacy, after the London Olympics. It has been a recreational area for the past 30 years.</li> <li>3). Increased traffic on Wiltshire Drive. At least 12 recorded accidents in recent years.</li> <li>4). Large lorries entering the field from Wiltshire Drive, during the adjacent housing development, prior to a school being built.</li> <li>5). Do we need a new school? Schools are included in plans for the Yarnbrook to Hillperton development.</li> </ol>				
<b>Please state which of the Sustainability Appraisal documents or Habitats Regulation Assessment document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b>		
<b>Please state which evidence document this representation relates to:</b>			<b>Please give details of why you support or do not support the updates to the associated evidence documents.</b>		

<p><b>Supporting documents (Please see Objective)</b></p>			
<p><b>Does your representation relate to a previous one you submitted at the pre-submission stage or previous consultation stage. If so, has the Council satisfied your objection through the proposed changes that have been prepared?</b></p>			
<p><b>Notification that the Inspectors Report into the Wiltshire Housing Site Allocations Plan has been published.</b></p>		<p><b>Future Notification that the Wiltshire Housing Site Allocations Plan has been formally adopted.</b></p>	



<b>Comment ID:</b>	549	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1187736	<b>Person ID:</b>	<b>Do you consider the Proposed Change to be sound?</b>	
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>		
<b>Identify Proposed Change Reference Number</b>	PC55				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>Petition to fight against the proposals for the Queen Elizabeth II Field. [A total of 348 signatures have been collected].</p> <p>Reasons why we need to fight the proposals.</p> <ol style="list-style-type: none"> <li>1). The loss of our only green area, for children to play, people exercising and dog walkers to use.</li> <li>2). The field became part of a legacy, after the London Olympics. It has been a recreational area for the past 30 years.</li> <li>3). Increased traffic on Wiltshire Drive. At least 12 recorded accidents in recent years.</li> <li>4). Large lorries entering the field from Wiltshire Drive, during the adjacent housing development, prior to a school being built.</li> <li>5). Do we need a new school? Schools are included in plans for the Yarnbrook to Hllperton development.</li> </ol>				
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This document was published by the Spatial Planning team, Wiltshire Council, Economic Development and Planning Services.

For further information please visit the following website:

<http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan.htm>

Information about Wiltshire Council services can be made available in other formats (such as large print or audio) and languages on request. Please contact the council on 0300 456 0100, by textphone on (01225) 712500 or by email on [customerservices@wiltshire.gov.uk](mailto:customerservices@wiltshire.gov.uk).