



# Wiltshire Housing Site Allocations Plan

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

**Addendum to the Consultation Report (Appendix D)  
January 2019**

## 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 ويلتشرير 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)

ولتشار کونسل (Wiltshire Council) کی سروسز کے بارے میں معلومات دوسری طرزوں میں فراہم کی جاسکتی ہیں (جیسے کہ بڑی چھپائی یا آڈیو) 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>	550	<b>Consultee</b> Bradford on Avon Town Council	<b>Agent</b>  <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1148294		<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>	<p>With reference to your letter dated 11 December requesting a response from the Town Council with regards to changes to the Housing site allocation Plan Document.</p> <p>As requested we are responding to this matter but note that Bradford on Avon did not appear to be on the list of changes as per your link below.</p> <p><a href="http://www.wiltshire.gov.uk/planning-whsap">http://www.wiltshire.gov.uk/planning-whsap</a></p>				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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>	551	<b>Consultee</b> Monkton Farleigh 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> 1196960		<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>	Monkton Farleigh Parish Council have no comments to make.				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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>		
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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>	552	<b>Consultee</b> Lambourn 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> 1196963		<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>	Thank you for consulting us – we have no comment.				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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>					

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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>	553	<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				
<b>Please give details of why you support or do not support the 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 concerns about the piece of land above the Rowbarrow estate towards the hospital remain the same. It is land that is abundant with wildlife and is one of the few remaining green lungs where people can walk and exercise dogs and commune with nature. I hope that house building will not happen there, but I fear that nobody will take much notice of ordinary local residents when decisions are made in Trowbridge.</p> <p>I hope that planners are aware of the height issues if plans do go ahead on this particular land which, at present, has direct and unobliterated views of the Cathedral. If more than single-storey housing is erected, this is likely to breach the rules about the Cathedral views.</p>				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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>					

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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>	554	<b>Consultee</b> Enford 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> 1197006		<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>	Thank you, I did receive your email in December. The reason there has been no response from Enford is, from memory, that it does not affect the parish.				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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>	555	<b>Consultee</b> Stapleford 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>  1197008		<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>	Having looked at the previous documentation and your recent email giving a closing date of the 22 January for comment - looking at the previous papers sent - there appears to be no mention of Stapleford and the immediate surrounding area - therefore there will be not further response from the Parish of Stapleford.				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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>			
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<b>Comment ID:</b>	556	<b>Consultee</b> Rowde 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> 1052998		<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>	Thank you for your e-mail. Rowde Parish Council has discussed the proposed amendments to the Wiltshire Housing Site Allocations Plan in relation to Rowde. The Parish Council do not have any comments to make about the amendments.				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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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<b>Supporting documents (Please see Objective)</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>	557	<b>Consultee</b> Bulford Parish Council	<b>Agent</b> Person ID:	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1146360		<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>	Bulford Parish Council has nothing further to add to the comments made on the previous consultation round. We are surrounded by MoD land over which we have minimal influence on its planned use.				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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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<b>Supporting documents (Please see Objective)</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>	559	<b>Consultee</b> Royal Wootton Bassett Town Council	<b>Agent</b>  <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 1197257		<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 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>Royal Wootton Bassett Town Council Planning Committee would like to submit the following comment:-</p> <p><i>Wiltshire Housing Site Allocation Plan – Royal Wootton Bassett Town Council wishes to submit that the suggested changes to amend pre-submission settlement boundary to include new dwellings at Lower Woodshaw , Brynards Hill, as this is built residential development that is physically related to the settlement, is acceptable in line with the settlement boundaries in Royal Wootton Bassett Neighbourhood Development Plan 2017 – 2026.</i></p>				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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>					

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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>	560	<b>Consultee</b> Donhead St Andrew 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> 558202		<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>	My councillors felt that they had no pertinent comments to offer.				
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Comment ID:	561	<b>Consultee</b> Mere Town Council  <b>Person ID:</b> 1197648	<b>Agent</b>  <b>Person ID:</b>	Do you consider the Proposed Change to be legally compliant?	
				Do you consider the Proposed Change to be sound?	
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: <b>Positively prepared; Justified; Effective; Consistent with national policy?</b>		
Identify Proposed Change Reference Number		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><b><i>Re: Wiltshire Housing Site Allocations Plan – Focused consultation on the Schedule of Proposed Changes and associated evidence documents.</i></b></p> <p>Thank you for your letter of 11<sup>th</sup> December and a copy of the Councillors Briefing Note No. 374. I can confirm that Mere Town Council had been made aware of this focused consultation at their October 2018 meeting, the Clerk &amp; Chairman having read through the <b>main</b> consultation documents and being satisfied that there were no issues at odds with the Town Council’s policies and understandings. We can confirm that the changes to the Housing Settlement Boundary accord with our own suggestions and previous consultations with Wiltshire Council. However, I would stress that it is almost impossible to find the time to read or examine all the context and evidence based documents. Not only that, the prospect of doing so is extremely daunting so we hope that we haven’t missed anything of significance to us.</p> <p>On that basis, we would just like to point out or reiterate one or two spatial planning issues that are of concern to Mere Town Council &amp; Mere Neighbourhood Plan Committee:</p> <ol style="list-style-type: none"> <li>1. Mere Town Council is feeling particularly frustrated about the lack of interest or take up in our allocated employment site and feels that if this is not utilised in the near future, we may put the case forward for Mere to be allocated an alternative employment site within the new Local Plan and for the existing one to be removed altogether</li> <li>2. Mere Town Council is open to consider Mere being allocated appropriately limited amount of housing in appropriate locations, particularly social or affordable in order to meet local housing needs.</li> <li>3. We would like to reiterate our comments on the “<b>Swindon &amp; Wiltshire Strategic Housing Market Assessment VOLUME ONE Defining the Housing Market Areas</b>” which are included below.</li> </ol>				

## Comments from Mere Town Council December 2017

While fully supporting effective planning for the housing needs of the county of Wiltshire, Mere Town Council has a number of objections to the pragmatic conclusion which Opinion Research Services (ORS) reaches, placing Mere in the Trowbridge HMA (Housing Market Area). These objections are based on a detailed examination of the methodology used and on local knowledge of the area which has not been considered by the desk-based study.

**Analysis** of the 'Swindon & Wiltshire Strategic Housing Market Assessment VOLUME ONE Defining the Housing Market Areas' referred to below as '**the study**'. There are no specific mentions of Mere in the document – all our comments are based on visual examination of the maps.

**P6** We note that the **Stakeholder Workshop** of 21 January 2016 did **not include North Dorset Council**, which represents Gillingham, the town with which Mere has the closest connections (enumerated below). It seems that the workshop failed to show the duty to cooperate with a neighbouring authority. This has led to significant omissions, which in our opinion severely compromises the conclusion of the study as it relates to Mere. Notably relating to the geography of :

- *House prices and rates of change in house prices*
- *Household migration and search patterns*
- *Contextual data (e.g. travel to work area boundaries, retail and school catchment areas)*

**P9** We note that in Figure 1, illustrating the CLG report "Geography of Housing Market Areas" (CLG, November 2010) - a starting point for drawing HMAs **Mere is shown as part of the Salisbury HMA.**

**P19 Analysing Commuting Patterns** -The map illustrating commuting flow data from the **2011 Census** groups **Mere with Gillingham in North Dorset**, rather than Trowbridge and Warminster.

**P20** There is no acknowledgement that the southern part of Wiltshire which forms the Salisbury TTWA has a significant border with **North Dorset.**

### Understanding Travel to Work Patterns

**P22 Figure 12.** It is hard to see any strong alignment of Mere with the seed points/clusters identified. The nearest is **Gillingham** (North Dorset) – the largest are **Salisbury and Yeovil**. While Warminster and Trowbridge appear to be within commuting reach – our comments below on **TRANSPORT LINKS** should be noted.

**P22-23 Initial and Proposed Commuting Zones** based on MSOA Boundaries – Figures 13 and 14. Both these maps show **Mere grouped with the Salisbury** based on figures derived from the 2011 census.



**P25** Modelling based on Census Output Areas (COA) **Figure 15** shows Mere in a gap between commuting centres – making it analogous to Pewsey (reference p26 3.18)

**P26** The study concludes the “**final stage of the process** therefore requires **manual review** in order to establish areas with **contiguous boundaries**”. While the manual review, according to the study “provide(s) outputs that are clearly **evidence based**”, we note that there has been no assessment of the quality of transport links available to Mere. We also draw your attention to the fact that this supposed **contiguous link** connecting Mere to Warminster to the north is not a link but the **barrier** of the escarpment of Salisbury Plain (see Commuting Flows below). The contiguous area to the east – towards Salisbury is facilitated by existing transport links.

**We are naturally focused towards Salisbury – not Trowbridge.**

**TRANSPORT LINKS** – factual **information omitted** from the study.

**Roads** – historic routeways run west to east and still strongly influence travel patterns in the present day . A fact acknowledged by **Eastern Dorset SHMA 2015 (G L Hearn)** “*In Dorset ... both migration and commuting data suggests that an East - West distinction within the County; and with some areas in the north relating more towards Salisbury and Yeovil.*” (P17 of the study)

- The A303 is the main transport corridor directly connecting Mere to Salisbury and London in the east and westwards towards Exeter. This is a major transport corridor of national significance.
- The A350 is the only trunk road leading north – it does not pass through Mere but crosses the A303 approx. 9km away.

**Public Transport** – daily links to Salisbury but not the north.

- Train services
- **Gillingham** 4 miles (Waterloo to Exeter via Salisbury) – regular service with daily bus service from Mere to Gillingham station and back.
- **Warminster** 10 miles - a 19 minute drive – with no daily bus service
  - Bus services
- to **Trowbridge** – 1 bus per week on Thursday 9:30am (journey time 85 mins)
- to **Warminster** – 1 bus per week on Friday 9:12am (journey time 60 mins)

(seems to be linked to weekly sign-on in the job centre as there is no market on that day)

- to **Salisbury** via Tisbury – **daily service** Mon to Friday 07:11am and 09:22am, Saturday 11:27am and 17:22pm

## **Proving that it is not possible to commute by public transport to Warminster or Trowbridge.**

**P27** Figures 17 and 18. We find it illogical that **solely on the basis** of a partial and **subjective** assessment of contiguous areas is **Mere separated from its historic focus of Salisbury** – and apparently, based on our understanding of the maps presented in the consultation, from its nearest Wiltshire neighbours of West and East Knoyle.

**P28-29 Commuting flows.** While the statistics are not sufficiently granular to draw any specific inferences regarding commuting to and from Mere – the fact that 67.3% of Trowbridge residents work in the local area, makes it unlikely that there is an inflow into Mere from the north. The **lower level of employment opportunities in Mere** makes it almost certain that commuting in Mere is an outflow. Commuting flows are analysed in Swindon and Wiltshire Functional Economic Market Area Assessment (**FEMA**). **Commuting flows** p6 Figures 2.4 and 5 confirm that there is no detectable commuting flow to or from Mere to Warminster, but modest flows shown between Mere and Gillingham, with the majority of flows to/from Salisbury. Both maps clearly show the barrier effect of Salisbury Plain.\*

**P30 Migration flows.** The assumption that “*commuting and migration zones generally follow the same boundary*”, while true for macro-areas, is unlikely to be accurate for a small town such as Mere, which has a high elderly population (2011 census – **37% aged 60+** compared to Wiltshire 24.6%), fed historically by migration on retirement from out of the area – notably the Home Counties.

**P33-34 House prices and rents.** Figures 23-24 maps show Mere as a relatively expensive housing area, more analogous to Salisbury than the A350 corridor in the Trowbridge and Westbury area.

**P35 Broad Rental Market Areas BRMA.** “*Both HMAs and BRMAs are based on functional linkages between where people live and work or where they live and access services.*” We have already noted that commuting links to the Trowbridge area are weak. Access to services from Mere is focused on Gillingham to the south and Salisbury for a fuller range of services. For more detail – see **Local Considerations** – below.

**P36** We note the statement – “*the Salisbury commuting zone is contained within a larger BRMA extending south into North Dorset...*” As we have proved the strong links between Mere and Gillingham (see above) – we conclude that the link with North Dorset **makes Mere a more natural partner with Salisbury.**

### **Local considerations**

In addition to our argument that Mere has wrongly come to be included in the Trowbridge HMA we want to add the following considerations about Mere’s close connections with the Salisbury area as was the case before this consultation.

- In the first instance we would mention **long-term relationships**, from Mere and Tisbury Rural District Council and then Salisbury and District Council through to today where we are members of the SWWAB with Tisbury, Wilton and neighbouring villages.

- **Transport to work** is identified as an important consideration and transport, in general in Mere it is along the East-West A303 corridor and to the South via Gillingham while the 'pre-war' network of roads going north is much less used. This may be anecdotal information but just standing at the top of Gillingham Road in the morning compared to standing on the B3092 Mere to Trowbridge road or B3095 Mere to Warminster road will confirm the commuting flow maps mentioned above.
- Bus services are predominately in these directions and the local rail link used is in Gillingham.
- While the **Jobcentre** allocated to Mere residents is in Trowbridge, people invariably change to Salisbury as it is possible to get there every day of the week by public transport whereas Thursday is the only day to get to Trowbridge.
- The **services provided for young families**, particularly the disadvantaged, are through the Children's Centre located in Mere and Tisbury.
- **Leisure facilities** for Mere residents are the Nadder Centre in Tisbury and Riversmeet in Gillingham. Our town football team is in the North Dorset League.
- **Education Catchment areas** are one of the measures used to define HMAs and Mere children continue their study after primary in Gillingham School and then Salisbury College or Yeovil College.
- Our **Health Services** are provided by hospital care in Salisbury, Shaftesbury and Poole. Our links were acknowledged by Mere residents being polled in the recent North Dorset CCG consultation.
- Mere is a settlement in rural area where **agricultural and horticultural businesses** are major employers, as in much of the Salisbury area. Where residents work in industry and retail it is over the Dorset border or along the **A303 corridor**.
- Our stand-alone **water supply** comes from local bore holes and is allocated to Mere and Gillingham and Marnhull.

We hope that this confirms our need to be associated for housing and employment consideration with the Salisbury area as we were before this latest consultation.

### **P37 Conclusions**

Assuming the validity of the methods used in this study – it is evident that the granularity of the data used has not made it possible to identify the special character of Mere.

We conclude that by all measures considered in the study, links from west to east, along the A303 and Salisbury to Exeter railway lines give Mere a strong synergy with Gillingham and North Dorset and with Salisbury. Links north-south towards Warminster and Trowbridge are weak. It would therefore be detrimental to group Mere with the housing needs of parts of Wiltshire with which it has little in common. The effects of ignoring these facts will not be trivial to Mere.

**Mere deserves and needs to continue be included in the Salisbury HMA.**

<p><b>SA docs or HRA doc - Please state which of the following matters 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>Which evidence document - Please state which of the following matters 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>	563	<b>Consultee</b> Chapmanslade Parish 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> 1127016		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Positively prepared;  Effective	
<b>Identify Proposed Change Reference Number</b>	SBR PC30				
<b>Please give details of why you support or do not support 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 mapping showing the settlement boundaries appears NOT to show either the current or the future housing development. Two examples are Barbers Farm at Chapmanslade where the settlement boundary does not include this site which clearly features in WC aspirations for housing developmwn.				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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>	564	<b>Consultee</b> Coombe Bissett Conservation Community Group	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 925419		<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>SA docs or HRA doc - Please state which of the following matters 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>RESPONSE: Representation Form B</b></p> <p>Consultation on a Schedule of Proposed Changes to the Wiltshire Housing Site Allocations Plan and associated evidence documents closing on 22nd January 2019 (extended consultation period due to technical error)</p> <p>The following response to this Consultation is location specific: to the village of Coombe Bissett, gate-keeper to Cranborne Chase and West Wiltshire Downs AONB, approximately three miles south west of Salisbury on the A354 Primary route. It straddles the River Ebble, has a</p>				

<p><b>Assessment Addendum (September 2018).</b></p>	<p>population of 437 and is linked with the neighbouring, separate settlement of Homington, which has a population of 122, to form the parish of Coombe Bissett and Homington. This response is a lay perspective, mindful of NPPF Principles, Landscape Designations, the loss of best and most versatile agricultural land, Heritage Assets and vulnerability to flooding. It reflects the exasperation of residents, weary and stressed by relentless planning revisions, and poor LPA planning decisions that generate intense and unnecessary pressure on this community; and an esoteric planning process that stifles effectual public representation and the equal right to Appeal.</p> <p>The Coombe Bissett Conservation Community Group (CBCCG) has repeatedly requested that all communications with: Wiltshire Council, Internal specialists, Planning Committees and Statutory Agencies, with reference to the Housing Site Allocation Process, be retained on record and included in the evidence base to be scrutinised by the Planning Inspectorate. The CBCCG is a constituted, community stake-holder group registered with Wiltshire Council, and Coombe Bissett and Homington Parish Council.</p> <p>Wiltshire Housing Site Allocations Plan: Sustainability Appraisal Report</p> <p>Key Sustainability Issues</p> <p>Topic Paper 2 explains the ‘Site Selection Process Methodology’ which accompanies the Revised Plan. The criteria and the proposed changes appear to underpin the unequivocal SHLAA Stage 1 Decision to exempt Coombe Bissett from progression through to Stage 2 in the Site Selection process. ‘Potential housing sites in areas of search which did not progress to the stage of SA have not been considered as ‘reasonable alternatives.’ Taken with Wiltshire Council’s ‘Groundwater Management Strategy 2016’, and government warnings of the increasing risks of extreme weather events, the SHLAA Stage 1 Decision demonstrates that the revised ‘Wiltshire Housing Site Allocation Plan – Submission Draft Plan 2018 (WHSAP/01) is: positively revised, justified in its Site Selection strategy to date, has the potential to deliver the housing numbers at the rate allowed -given complex local circumstances; and consistent with the National Planning Policy Framework.</p> <p>However, page 9, ‘Water Resources and Flood Risk’ does not mention the River Ebbles; or refer to the local, inadequate, antiquated and broken drainage system and sewerage contamination when ground water levels rise.</p> <p>The criteria detailed in the ‘Wiltshire Council Site Allocations Plan: Sustainability Appraisal (Atkins) Report seem to substantiate that the housing need has already been met for Coombe Bissett.</p>		
<p><b>Which evidence document - Please state which of the following matters 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>			



<b>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>	Yes

<b>Comment ID:</b>	565	<b>Consultee</b> Coombe Bissett Conservation Community Group	<b>Agent</b> <b>Person ID:</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 925419		<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>	<p><u>Consultation Questions: Wiltshire Local Plan Review Consultation Paper, November 2017</u></p> <p><i>(Wiltshire Council source in italics)</i></p> <p><u>Question 1</u></p> <p><i>Do you agree with the proposed scope of the Wiltshire Local Plan Review set out in Section 4? If no, please explain why and how it should be amended.</i></p> <p><i>The proposed scope of the review is set out in the Wiltshire Local Development Scheme September 2017 and reproduced below. The purpose of the review of the adopted Local Plan will be to assess the future levels of need for new homes (including market, affordable and specialist housing and Gypsy and Traveller accommodation) and employment land over the period 2016-2036 and to provide an appropriate basis for housing, employment land and infrastructure provision over that period.</i></p> <p><i>It will involve considering if the existing adopted development strategy remains relevant, identifying new site allocations relating to housing and employment together with supporting services and infrastructure. The review will also include:</i></p> <p><i>some updating of existing Wiltshire Core Strategy development management policies to ensure their continued consistency with national policy; • the introduction of additional development management policies in response to the review of the saved development management policies not replaced by the Wiltshire Core Strategy; and • developing additional locally distinctive policies to plan positively for all town centres in Wiltshire consistent with national policy.</i></p>				

*\*It will not be the purpose of the review to change or remove strategic objectives or policies that remain in accordance with national policy and support the delivery of sustainable development.*

Answer:

The Coombe Bissett Conservation Community Group is in broad agreement with the proposed scope of the review and would welcome locally distinctive policies. The CBCCG is supportive of a Landscape Character Assessment (LCA) and Special Landscape Areas (SLA) to identify those truly unique areas of Wiltshire and protect them for the future. Locally, that would include the CC&WWDs AONB and Wiltshire Wildlife Trust's SSSIs; the landmarks - Grade I Listed St. Michael's church and the 300 year old Packhorse bridge parallel to the A354 road-bridge - all vulnerable to flooding pressures; and the majestic A354 avenue of mature trees at Bake Farm that provide a wonderful introduction to both Salisbury and Coombe Bissett. However, relaxation of these designations, and the development-precedent that might be triggered, would be fiercely contested; e.g. early in the SHLAA site selection process Wiltshire Council muted the possibility of re-drawing AONB boundaries.

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Question 2

*Do you agree with the conclusions of the policy assessment set out in Appendix 2 and the proposed recommendations? Please explain your answer.*

Appendix 2: Assessment of adopted policies Issues arising from an assessment of 'saved' policies of the former district councils

*The following tables set out the proposed scope of the planning policy issues arising from an initial gap analysis of saved policies and national policy (NPPF and PPG) that are proposed to be addressed by the Wiltshire Local Plan Review. For ease of reference the policies are split by theme, with reference to the Strategic Objectives and the Community Area Strategies of the Wiltshire Core Strategy.*

Answer

Please note, over many years the Coombe Bissett Conservation Community Group (CBCCG) has commented extensively across a number of policy issues; some referred to in Appendix 2, to all the relevant bodies responsible for determining planning proposals outside of the village settlement boundary. Mindful not to repeat that body of comment, it is important to state in this consultation exercise, that the LPA and SAPC have left this community badly affected, as a result of their questionable planning decisions. Residents have lost confidence in the LPA's methodology.

The CBCCG would, at least, request Environmental Reports from independent specialists, a Construction Environmental Management Plan that guarantees that any future management and maintenance of drainage systems are made legal obligations, a Transport Statement, an Ecology Assessment, Archaeology Assessment, and assessment of phosphate loading for the River Ebble, etc.

PR4 Issue:

*Farm Diversification, equine facilities and change of use and development .....*

*Core Policy CP34 also supports sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification and supports new and existing rural based businesses within or adjacent to Large and Small Villages.*

Answer

Coombe Bissett residents have experienced a highly controversial farming land diversification to industrial installation/solar park, at Bake Farm, Coombe Bissett, on land adjoining the Cranborne Chase & West Wiltshire Downs AONB. Bake Farm landowners are also submitting SHLAA/SHELAA sites for consideration. A housing development at Bake Farm would effectively close the narrowing landscape gap that separates Salisbury from Coombe Bissett.

It has been calculated that the land in Britain that is farmed must increase by 28% to supply the growing demand for food by 2050 (Professor Andrew Balmford, Cambridge University)

Residents were justifiably aggrieved at the inappropriate and unnecessary choice of location, given: the rational and reasonable alternatives; lack of genuine public consultation; and questionable performances by the LPA and SAPC during the long-running Bake Farm Solar Park fiasco. Concerns, including comments from a CPRE executive, should be on record.

This solar panel industrialisation of high-quality agricultural land glares across green field landscape from as far away as the A36 (slope near to Pepperbox Hill - travelling in the Salisbury direction); the brow-of- hill turning into Salisbury Hospital, and (upper levels) Coombe Bissett village walks.

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PR13 Issue:

*Location of /permissive exceptions policy on education.....*

*NPPF Paragraph 37 states that policies should aim for a balance of land uses so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.*

*A generic permissive exceptions policy on the location of education and community facilities needs to be developed .....2017 WCS Review Recommendation Core Policy 3 covers the requirement for infrastructure and the Planning Obligations Supplementary Planning Document also sets out the Council's approach to contributions.....*

*The criteria in PS6 are now covered under Core Policy 57, in relation to the compatibility of uses and Core Policy 61 in relation to highway issues.*

Answer

The over-subscribed Primary school at Coombe Bissett is located awkwardly on a steep narrow lane, with a turning between two blind bends. The majority of pupils travel from outside of the village, delivered and collected by car. This causes dangerous congestion, a long-running problem.

It is not clear how the school will progress in these times of academisation pressures; and whether re-location due to amalgamation, or a larger more accessible site, and economies of scale might be the future plan. A housing development with access onto Homington Road immediately before the Shutt's Lane turning to the school, would exacerbate traffic congestion and the dangers for young children negotiating the narrow lane with no verge – getting in and out of parked cars, blind bends, traffic pinch points and speeding HGVs etc.

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PR15 Issue:

*Health and Wellbeing*

Answer

Without intending to be facetious, the health of parish residents is being seriously affected by the relentless run of planning pressures - a debilitating, slumbering threat for many to contend with, as well as family responsibilities and depressing political turmoil. The multiplication of SHLAA to SHELAA site applications now threatening this village, after what was thought to be the common-sense, unequivocal SHLAA Stage 1 Decision overseen by the Planning Inspectorate, has left many residents demoralised, stressed, and confused by Wiltshire Council's planning manoeuvres.

Coombe Bissett has a strong sense of pride in its landscape setting, dependent on the open-to-all AONB and Sites of Special Scientific Interest, (Wiltshire Wildlife Trust, supported by the Heritage Lottery Fund and the residents of this Parish.)

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PR16 Issue:

*Public safety from major accidents 2015 Partial Review Existing plan policy to be reviewed and / or NPPF reference NPPF Paragraph 172 - Planning policies should be based on up-to-date information on the location of major hazards and on the mitigation of the consequences of major accidents.*

*Assessment It should be investigated to determine if there are major hazards in Wiltshire that could create a major accident. 2017 WCS Review*

*Recommendation The major hazards are known within Wiltshire and dealt with via the Control of Major Accident Hazards (COMAH) legislation, and for any planning applications that are received close to such a hazard, the Council would use the Health and Safety Executive's (HSE) HSE Planning Advice Web App to ascertain whether permission should be granted. Given this knowledge and the procedures that are in place this does not need to be repeated.*

Answer

Does the Planning Advice Web App include River Ebbles flooding: the vulnerability of the Coombe Bissett community, particularly those that are housebound; and emergency plans to deal with any potential structural failing of the A354 Primary route road-bridge? The parish was without emergency services for many days during the severe flooding 2014

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Strategic Objective 5 – protecting and enhancing the natural, historic and built environment

PR17 Issue:

*Enabling Development*

*2015 Partial Review*

*Existing plan policy to be reviewed and / or NPPF reference SDLP policy G10 (Enabling development) - Policy sets out where development proposals may be acceptable when development would not usually be permitted, provided that*

*certain criteria are met to ensure that the overall benefits would outweigh any disadvantages. The policy relates particularly to the continued preservation of heritage assets.*

*NPPF Paragraph 55 promotes enabling development in order to secure heritage assets which is including within Core Policy 48 of WCS.*

*Assessment The NPPF does include the principle of the policy.*

*Potential to introduce principle to Core Strategy and set out Wiltshire basis (possibly as part of Core Policy 58). Currently saved policy G10 probably overly restrictive. 2017 WCS Review Recommendation: As Core Policy 58 already states that statutory consultees such as Historic England will be consulted in the determination of any applications potentially affecting a heritage asset, and that Historic England will be using their Enabling Development policy guidance to inform their recommendation, it is not considered that an amendment to Core Policy 58 is necessary.*

*However, since adoption of the Core Strategy case law has extended our understanding of how advice in the NPPF in relation to heritage assets should be implemented. It is recommended that the supporting text to Core Policy 58 is reviewed in consultation with Historic England to reflect the most up to date position.*

*Delete SDLP Policy G10*

Answer:

The CBCCG has previously commented on the role of Statutory Agencies and their remit to offer pre-application services to Developers. It would appear that they must adopt a positive position to facilitate development, rather than take an objective neutral, or negative position. ('10 Commitments for Effective Pre-application Engagement' LGA guidance document) The CBCCG question how Developers might gain advantages in the weighing of such authoritatively presented material evidence? Coombe Bissett and Homington Parish were denied a Conservation Area Appraisal Management.

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PR23 Issue:

*Special Landscape Area*

*2015 Partial Review. Existing plan policy to be reviewed and / or NPPF reference*

*SDLP policy C6 (Special Landscape Area) WWLP policy C3 (Special Landscape Area) Policy setting out the considerations required for proposals within the Special Landscape Areas. Assessment Not covered by NPPF.*

*Wiltshire Core Strategy Paragraph 6.86 states: The emerging Wiltshire Landscape Strategy will review the need for Special Landscape Areas (SLAs) in Wiltshire and, if necessary, also clarify their special characteristics and boundaries. In the interim they will continue to be protected under relevant saved local plan policies, and if evidence demonstrates the need for SLAs these policies will be superseded by a Wiltshire-wide policy.*

*Possible outcomes could include Core Policy 51 being amended to cover Special Landscape Areas. 2017 WCS Review Recommendation Work is ongoing in relation to the review of the exiting Landscape Character Assessments and AONB Management Plans to develop a Wiltshire Landscape Strategy. The outcome of this work will inform whether a new policy is needed in relation to the Special Landscape Areas to be protected or amendments to Core Policy 51 and its supporting text are required.*

Answer

The CBCCG support the need for Special Landscape Areas in Wiltshire; and the need to prevent the continuous urban sprawl that has nullified much of the character of south Hampshire, escalating environmental and landscape pressures.

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PR25 Issue:

*Land stability*

*2015 Partial Review*

*Existing plan policy to be reviewed and / or NPPF reference*

*NPPF Paragraph 120 Ensure new development is appropriate for its location, to prevent unacceptable risks from pollution and land instability.*

*Assessment A criteria-based policy will be developed as part of the early partial review of the Core Strategy. 2017 WCS Review*

*Recommendation The Wiltshire Core Strategy currently does not contain a policy which deals with land / slope stability, except in relation to Gypsy and Traveller sites Core Policy 47) criteria i.*



*Core Policy 56 sets out the planning policy for development on or affected by contaminated land, which covers similar considerations as those that would need to be considered in relation to land instability.*

*NPPF Paragraph 120 makes clear that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner. There is a need for policy guidance within the Core Strategy which will ensure that developers and landowners are clear about their obligations when considering development proposals that could affect or are affected by land/slope stability in Wiltshire. Core Policy 56 could be expanded to encompass requirements relating to land and slope stability. This would require amendments to the policy text and the supporting text.*

Answer

The unpredictable behaviour of water through chalk is covered in Wiltshire Council's 'Groundwater Management Strategy 2016', along with associated building risks. A frequent occurrence in this village: springs erupting through ground floors, for weeks!

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PR30 Issue:

*Flood risk*

*2015 Partial Review*

*Existing plan policy to be reviewed and / or NPPF reference*

*NPPF Paragraph 100 - Direct development away from areas at highest risk but where development is necessary, make it safe without increasing flood risk elsewhere.*

*Assessment Core Policy 67 considers housing development but is not necessarily clear with regard to the location of other forms of development. This could be clarified. 2017 WCS Review Recommendation Amendments to Core Policy 67 supporting text and policy are recommended to aid clarity.*

Answer

The CBCCG has previously commented on Coombe Bissett's vulnerability to flooding, due to its settlement pattern along the River Ebble, its ground water issues; and inadequate, antiquated and broken drainage system erratically maintained by Wiltshire Council.

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PR41 Issue:

*Climate Change Existing plan policy to be reviewed and / or NPPF reference NPPF Paragraph 99 says Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.*

*2017 WCS Review Recommendation The Core Strategy already contributes to tackling climate change by: • delivering the most sustainable patterns of development through focusing growth at the Principal Settlements and Market Towns, as set out by the settlement; • building communities which are resilient to the future impacts of a changing climate as well as other social or economic challenges; • providing an adequate network of green infrastructure which helps to provide shading, and so contributes to cooling in urban areas, and also provides habitats to assist biodiversity adapt to a changing climate; • ensuring more sustainable forms of transport are supported through the development of sustainable transport strategies, thus helping to reduce greenhouse gas emissions; and • reducing the risk of flooding by ensuring that new development is neither vulnerable to flooding nor increases the risk of flooding elsewhere.*

Answer

Coombe Bissett residents are acutely sensitive to: climate change and their inadequate defence against flooding; the need to increase biodiversity; the retention of best and most versatile agricultural land, and the need to reduce the number of car journeys.

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PR43 Issue:

*Affordable Housing Threshold Existing plan policy to be reviewed and / or NPPF reference PPG Paragraph 31: There are specific circumstances where contributions for affordable housing should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the written ministerial statement of 28 November 2014 and should be taken into account.*

*These circumstances are that:*

*contributions should not be sought from developments of 10 units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area) • in designated rural areas, local planning authorities may choose to apply a lower threshold of 5 units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10 units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty affordable housing and tariff-style contributions should not be sought from any development consisting only of the construction of a residential annex or extension to an existing home.*

*2017 WCS Review Recommendation Review Core Policy 43 which currently requires sites of 5 or more dwellings to provide affordable housing. Amendments to the policy may be required.*

Answer

In the case of Coombe Bissett a potential development of 5 units or less, inside the AONB, would prompt inflated market prices. The advantage of no affordable housing or tariff-style contributions would incentivise local landowners; and if AONB building restrictions are relaxed, a rash of sites could result – through new precedents and the right of Appeal. A hunger for much larger numbers has been stimulated by the SHELAA 'Call for Sites'. 'Affordable housing' has become a confusing term.

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QUESTION 3.

*Are there other planning policy issues that the Council should consider within the Local Plan Review? If so, what are they and why should they be included?*

Answer (CBCCG: underlining)

a) Wiltshire Council continues to send confusing signals, which continue to antagonise this community:

Strategic Housing and Economic Land Availability Assessment Methodology August 2018

*1.1 Paragraph 159 of the National Planning Policy Framework (NPPF) requires local planning authorities (LPAs) to prepare a Strategic Housing Land Availability Assessment (SHLAA) "to establish realistic assumptions about the availability, suitability, and the likely economic viability of land to meet the identified need for housing over the plan*

*period". Paragraph 161 (second bullet point) identifies the advantages of carrying out land assessments for housing and economic development in tandem, to ensure that sites can be considered for the most appropriate use.*

*1.4 This SHELAA updates and replaces the earlier Strategic Housing Land Availability Assessment (SHLAA) and will be expanded to also include economic uses for sites. All sites previously considered within the SHLAA reports are now considered within the SHELAA.*

The methodology of the SHELAA Site List to inform planning policy until 2036, and the spurious calculations it suggests - more unsuitable sites at increased densities - exerts more pressure on this village. From a lay perspective, it is difficult to ascertain Wiltshire Council's forward value of the SHELAA Site List, in relation to Coombe Bissett? The CBCCG would challenge that the SHELAA 'establishes realistic assumptions' in deliverability. Given the unequivocal SHLAA Stage 1 decision\*; and the Wiltshire Housing Site Allocations Plan: Sustainability Appraisal Report, the SHELAA is a crude instrument without integrity or credibility as material methodology. This Parish is restricted to incremental development until at least 2026 following the explicit SHLAA Stage 1 decision:

\* 'Any indicative residual requirement for the Southern Wiltshire Community Area Remainder to be delivered during the Plan period has been met. Therefore, the Plan will not need to allocate additional land to help meet an indicative residual requirement. It is proposed that housing sites will not be identified for this Parish, it does not allocate them for development or add weight to any site for the purpose within the Southern Wiltshire Community Area Remainder and the site selection ends after Stage 1.'

The overall benefits of any development outside the proposed settlement boundary; and inside, or alongside the AONB boundary must outweigh the disadvantages. It is our hope that any such local development proposal would be objectively determined by the Planning Inspectorate, so that the timing of public consultation could be genuinely effectual and the presentation of independent evidence could be genuinely considered.

b) Coombe Bissett and Homington Neighbourhood Plan initiative.

Under the guidance of a Local Planning Authority assigned planning officer, a small group of self-appointed residents has registered a Neighbourhood Plan Steering Group. The Parish Council is the Qualifying Body. Councillor Richard Clewer is this Parish's unitary councillor and Cabinet Member and he regularly attends Parish Council meetings.

The 'Neighbourhood Plan Steering Committee' and the Parish Council seem unable to adhere to a credible Neighbourhood Plan process and are heavily reliant on the advice of a contracted planning advisor. The CBCCG recently raised concerns about the evidence cited to justify the distribution of a Neighbourhood Plan Questionnaire, and a premature 'Call for Sites' without public debate. As analysis of the Questionnaire will provide material evidence, their methodology might be shaky? Wiltshire Council's NP 'Frequently Asked Questions' suggests that the making of a NP

	<p>could cost in the region of £60,000 in complex circumstances - and this village is likely to present complex issues around the making of a Neighbourhood Plan. The CBCCG questions this use of public resources in light of the SHLAA Stage 1 Decision; and the Wiltshire Housing Site Allocations Plan: Sustainability Appraisal Report.</p> <p>As the making and 5 year shelf life of a Neighbourhood Plan up to its Review, would run concurrently with the SHLAA Stage 1 Decision which has come out of protracted planning evaluation - under the scrutiny of the Planning Inspectorate; what purpose is a poorly constructed Neighbourhood Plan that might create new precedents, under the guidance of the LPA?</p> <p>Coombe Bissett and Homington Parish were denied a Conservation Area Appraisal Management Plan; the usual precursor to a Neighbourhood [Plan.</p>		
<p><b>SA docs or HRA doc - Please state which of the following matters 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>Which evidence document - Please state which of the following matters 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>	Yes
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Comment ID:	566	<b>Consultee</b> Bellway Homes Ltd (Wessex)  <b>Person ID:</b> 1197672	<b>Agent</b> Savills Planning  <b>Person ID:</b> 556489	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	PC107				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>		<p>Bellway Homes support the principal aim of policy H3.4 to allocate the land at Rowbarrow for residential development but object to the reference to <u>approximately 100 dwellings</u>.</p> <p>Bellway Homes has been looking carefully at the housing capacity of this site, whilst recognising its planning constraints. Architects are currently preparing a more accurate layout plan, compared to the original illustrative masterplan submitted. This will demonstrate that <u>more than a hundred dwellings</u> can be accommodated. This is not quite ready but will be sent to the Council as soon as possible, for onward transmission to the Inspector</p> <p>Bellway Homes would therefore like to see an amendment to Policy H3.4 so it reads <u>approximately 100 plus dwellings*</u>, and focused change reference PC107, so paragraph 5.146 reads:</p> <p><i>"Land at Rowbarrow is allocated for the development of <u>approximately 100 plus*</u> dwellings on 5.56 ha of land as shown on the Policies Map"</i></p> <p><b>NB</b> *A more precise number than <u>approximately 100 plus</u> can be inserted when all have had sight of the revised layout plan.</p> <p>Without a higher number of dwellings Bellway Homes do not consider the Plan accords with Section 11 of the National Planning Policy Framework July 2018 - <i>Making effective use of land and Achieving appropriate densities</i></p>			
SA docs or HRA doc - Please state which of the			Please give details of why you support or do not support the updates to the		

<p>following matters this representation relates to:</p>		<p><b>Sustainability Appraisal (September 2018) or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Which evidence document - Please state which of the following matters 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>	567	<b>Consultee</b> Grittleton 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> 1197673		<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>					
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	Grittleton Parish Council discussed the targeted consultation at their meeting on 21st January 2019 and have no comment.				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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:	570	<b>Consultee</b> Mere Town Council  <b>Person ID:</b> 1197648	<b>Agent</b>  <b>Person ID:</b>	Do you consider the Proposed Change to be legally compliant?	
				Do you consider the Proposed Change to be sound?	
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: <b>Positively prepared; Justified; Effective; Consistent with national policy?</b>		
Identify Proposed Change Reference Number		SBR PC36			
Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not	<p><b><i>Re: Wiltshire Housing Site Allocations Plan – Focused consultation on the Schedule of Proposed Changes and associated evidence documents.</i></b></p> <p>Thank you for your letter of 11<sup>th</sup> December and a copy of the Councillors Briefing Note No. 374. I can confirm that Mere Town Council had been made aware of this focused consultation at their October 2018 meeting, the Clerk &amp; Chairman having read through the <b>main</b> consultation documents and being satisfied that there were no issues at odds with the Town Council’s policies and understandings. We can confirm that the changes to the Housing Settlement Boundary accord with our own suggestions and previous consultations with Wiltshire Council. However, I would stress that it is almost impossible to find the time to read or examine all the context and evidence based documents. Not only that, the prospect of doing so is extremely daunting so we hope that we haven’t missed anything of significance to us.</p> <p>On that basis, we would just like to point out or reiterate one or two spatial planning issues that are of concern to Mere Town Council &amp; Mere Neighbourhood Plan Committee:</p> <ol style="list-style-type: none"> <li>1. Mere Town Council is feeling particularly frustrated about the lack of interest or take up in our allocated employment site and feels that if this is not utilised in the near future, we may put the case forward for Mere to be allocated an alternative employment site within the new Local Plan and for the existing one to be removed altogether</li> <li>2. Mere Town Council is open to consider Mere being allocated appropriately limited amount of housing in appropriate locations, particularly social or affordable in order to meet local housing needs.</li> <li>3. We would like to reiterate our comments on the “<b><i>Swindon &amp; Wiltshire Strategic Housing Market Assessment VOLUME ONE Defining the Housing Market Areas</i></b>” which are included below.</li> </ol>				

## Comments from Mere Town Council December 2017

While fully supporting effective planning for the housing needs of the county of Wiltshire, Mere Town Council has a number of objections to the pragmatic conclusion which Opinion Research Services (ORS) reaches, placing Mere in the Trowbridge HMA (Housing Market Area). These objections are based on a detailed examination of the methodology used and on local knowledge of the area which has not been considered by the desk-based study.

**Analysis** of the 'Swindon & Wiltshire Strategic Housing Market Assessment VOLUME ONE Defining the Housing Market Areas' referred to below as '**the study**'. There are no specific mentions of Mere in the document – all our comments are based on visual examination of the maps.

**P6** We note that the **Stakeholder Workshop** of 21 January 2016 did **not include North Dorset Council**, which represents Gillingham, the town with which Mere has the closest connections (enumerated below). It seems that the workshop failed to show the duty to cooperate with a neighbouring authority. This has led to significant omissions, which in our opinion severely compromises the conclusion of the study as it relates to Mere. Notably relating to the geography of :

- *House prices and rates of change in house prices*
- *Household migration and search patterns*
- *Contextual data (e.g. travel to work area boundaries, retail and school catchment areas)*

**P9** We note that in Figure 1, illustrating the CLG report "Geography of Housing Market Areas" (CLG, November 2010) - a starting point for drawing HMAs **Mere is shown as part of the Salisbury HMA.**

**P19 Analysing Commuting Patterns** -The map illustrating commuting flow data from the **2011 Census** groups **Mere with Gillingham in North Dorset**, rather than Trowbridge and Warminster.

**P20** There is no acknowledgement that the southern part of Wiltshire which forms the Salisbury TTWA has a significant border with **North Dorset.**

### Understanding Travel to Work Patterns

**P22 Figure 12.** It is hard to see any strong alignment of Mere with the seed points/clusters identified. The nearest is **Gillingham** (North Dorset) – the largest are **Salisbury and Yeovil**. While Warminster and Trowbridge appear to be within commuting reach – our comments below on **TRANSPORT LINKS** should be noted.

**P22-23 Initial and Proposed Commuting Zones** based on MSOA Boundaries – Figures 13 and 14. Both these maps show **Mere grouped with the Salisbury** based on figures derived from the 2011 census.

**P25** Modelling based on Census Output Areas (COA) **Figure 15** shows Mere in a gap between commuting centres – making it analogous to Pewsey (reference p26 3.18)

**P26** The study concludes the “**final stage of the process** therefore requires **manual review** in order to establish areas with **contiguous boundaries**”. While the manual review, according to the study “provide(s) outputs that are clearly **evidence based**”, we note that there has been no assessment of the quality of transport links available to Mere. We also draw your attention to the fact that this supposed **contiguous link** connecting Mere to Warminster to the north is not a link but the **barrier** of the escarpment of Salisbury Plain (see Commuting Flows below). The contiguous area to the east – towards Salisbury is facilitated by existing transport links.

**We are naturally focused towards Salisbury – not Trowbridge.**

**TRANSPORT LINKS** – factual **information omitted** from the study.

**Roads** – historic routeways run west to east and still strongly influence travel patterns in the present day . A fact acknowledged by **Eastern Dorset SHMA 2015 (G L Hearn)** “In Dorset ... both migration and commuting data suggests that an East - West distinction within the County; and with some areas in the north relating more towards Salisbury and Yeovil.” (P17 of the study)

- The A303 is the main transport corridor directly connecting Mere to Salisbury and London in the east and westwards towards Exeter. This is a major transport corridor of national significance.
- The A350 is the only trunk road leading north – it does not pass through Mere but crosses the A303 approx. 9km away.

**Public Transport** – daily links to Salisbury but not the north.

- Train services
- **Gillingham** 4 miles (Waterloo to Exeter via Salisbury) – regular service with daily bus service from Mere to Gillingham station and back.
- **Warminster** 10 miles - a 19 minute drive – with no daily bus service
  - Bus services
- to **Trowbridge** – 1 bus per week on Thursday 9:30am (journey time 85 mins)
- to **Warminster** – 1 bus per week on Friday 9:12am (journey time 60 mins)

(seems to be linked to weekly sign-on in the job centre as there is no market on that day)

- to **Salisbury** via Tisbury – **daily service** Mon to Friday 07:11am and 09:22am.

Saturday 11:27am and 17:22pm

**Proving that it is not possible to commute by public transport to Warminster or Trowbridge.**

**P27** Figures 17 and 18. We find it illogical that **solely on the basis** of a partial and **subjective** assessment of contiguous areas is **Mere separated from its historic focus of Salisbury** – and apparently, based on our understanding of the maps presented in the consultation, from its nearest Wiltshire neighbours of West and East Knoyle.

**P28-29 Commuting flows.** While the statics are not sufficiently granular to draw any specific inferences regarding commuting to and from Mere – the fact that 67.3% of Trowbridge residents work in the local area, makes it unlikely that there is an inflow into Mere from the north. The **lower level of employment opportunities in Mere** makes it almost certain that commuting in Mere is an outflow. Commuting flows are analysed in Swindon and Wiltshire Functional Economic Market Area Assessment (**FEMA**). **Commuting flows** p6 Figures 2.4 and 5 confirm that there is no detectable commuting flow to or from Mere to Warminster, but modest flows shown between Mere and Gillingham, with the majority of flows to/from Salisbury. Both maps clearly show the barrier effect of Salisbury Plain.\*

**P30 Migration flows.** The assumption that “*commuting and migration zones generally follow the same boundary*”, while true for macro-areas, is unlikely to be accurate for a small town such as Mere, which has a high elderly population (2011 census – **37% aged 60+** compared to Wiltshire 24.6%), fed historically by migration on retirement from out of the area – notably the Home Counties.

**P33-34 House prices and rents.** Figures 23-24 maps show Mere as a relatively expensive housing area, more analogous to Salisbury than the A350 corridor in the Trowbridge and Westbury area.

**P35 Broad Rental Market Areas BRMA.** “*Both HMAs and BRMAs are based on functional linkages between where people live and work or where they live and access services.*” We have already noted that commuting links to the Trowbridge area are weak. Access to services from Mere is focused on Gillingham to the south and Salisbury for a fuller range of services. For more detail – see **Local Considerations** – below.

**P36** We note the statement – “*the Salisbury commuting zone is contained within a larger BRMA extending south into North Dorset...*” As we have proved the strong links between Mere and Gillingham (see above) – we conclude that the link with North Dorset **makes Mere a more natural partner with Salisbury.**

**Local considerations**

In addition to our argument that Mere has wrongly come to be included in the Trowbridge HMA we want to add the following considerations about Mere’s close connections with the Salisbury area as was the case before this consultation.

- In the first instance we would mention **long-term relationships**, from Mere and Tisbury Rural District Council and then Salisbury and District Council through to today where we are members of the SWWAB with Tisbury, Wilton and neighbouring villages.
- **Transport to work** is identified as an important consideration and transport, in general in Mere it is along the East-West A303 corridor and to the South via Gillingham while the 'pre-war' network of roads going north is much less used. This may be anecdotal information but just standing at the top of Gillingham Road in the morning compared to standing on the B3092 Mere to Trowbridge road or B3095 Mere to Warminster road will confirm the commuting flow maps mentioned above.
- Bus services are predominately in these directions and the local rail link used is in Gillingham.
- While the **Jobcentre** allocated to Mere residents is in Trowbridge, people invariably change to Salisbury as it is possible to get there every day of the week by public transport whereas Thursday is the only day to get to Trowbridge.
- The **services provided for young families**, particularly the disadvantaged, are through the Children's Centre located in Mere and Tisbury.
- **Leisure facilities** for Mere residents are the Nadder Centre in Tisbury and Riversmeet in Gillingham. Our town football team is in the North Dorset League.
- **Education Catchment areas** are one of the measures used to define HMAs and Mere children continue their study after primary in Gillingham School and then Salisbury College or Yeovil College.
- Our **Health Services** are provided by hospital care in Salisbury, Shaftesbury and Poole. Our links were acknowledged by Mere residents being polled in the recent North Dorset CCG consultation.
- Mere is a settlement in rural area where **agricultural and horticultural businesses** are major employers, as in much of the Salisbury area. Where residents work in industry and retail it is over the Dorset border or along the **A303 corridor**.
- Our stand-alone **water supply** comes from local bore holes and is allocated to Mere and Gillingham and Marnhull.

We hope that this confirms our need to be associated for housing and employment consideration with the Salisbury area as we were before this latest consultation.

### **P37 Conclusions**

Assuming the validity of the methods used in this study – it is evident that the granularity of the data used has not made it possible to identify the special character of Mere.

We conclude that by all measures considered in the study, links from west to east, along the A303 and Salisbury to Exeter railway lines give Mere a strong synergy with Gillingham and North Dorset and with Salisbury. Links north-south

	<p>towards Warminster and Trowbridge are weak. It would therefore be detrimental to group Mere with the housing needs of parts of Wiltshire with which it has little in common. The effects of ignoring these facts will not be trivial to Mere.</p> <p><b>Mere deserves and needs to continue be included in the Salisbury HMA.</b></p>		
<p><b>SA docs or HRA doc - Please state which of the following matters 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>Which evidence document - Please state which of the following matters 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>	571	<b>Consultee</b> Chapmanslade Parish 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> 1127016		<b>Do you consider the Proposed Change to be sound?</b>	No
<b>Identify subject of representation</b>	Schedule of Proposed Changes - Consultation Document (September 2018) (EXAM/01)		<b>Do you consider the consultation material you are commenting on is unsound because it is not: Positively prepared; Justified; Effective; Consistent with national policy?</b>	Positively prepared	
<b>Identify Proposed Change Reference Number</b>	N/A			Effective	
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	At Westbury there is a new housing development on the A350 between the Lidl superstore and the railway bridge and again this is outside the settlement boundary despite houses already erected on site. This raises the question - What is the purpose of settlement boundary maps if they do not reflect actuality?				
<b>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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>	573	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 902879	Urquhart Development and Management Services Ltd <b>Person ID:</b> 902887	<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>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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>	Question 4 - Reference - Exam.01 .39 Schedule of Proposed Changes - (Sept 2018) -39 of 46 -WHITEPARISH and Exam / 02A.				

**associated evidence documents.**

The consultation material is - in my view- not legally compliant because potential sites that lie within undefined or out of date settlement boundaries have not been subjected to a Sustainability Appraisal.

In addition sufficient information on potential development sites within small settlements and the accuracy of existing settlement boundaries is unavailable to the planning authority.

The Neighbourhood Planning Activity map - last updated in December 2018 - shows that out of a total of 257 settlements in the county only 24 has a formal neighbourhood plan.

The low level of formal Neighbourhood plans for such a large part of the county, at this point in time, results in lost opportunities for home building and ineffective neighbourhood planning.

The housing site selection process therefore is flawed and has not been positively prepared.

The policy decision of the authority to review settlement boundaries as part of its housing programme and to rely on small settlements to establish development plans and boundaries county wide, raises questions as to the effectiveness and reliability of the proposed changes.

Wiltshire Council has the statutory responsibility for Neighbourhood planning consequently a strong connection between their settlement boundary reviews and the Neighbourhood plans - which the parish and Town council's can implement - has to be present.

The inability of many small villages - such as Whiteparish - to find the necessary volunteers and qualified village representatives to create forums, development plans, define settlement boundaries is a major challenge to them and the planning authority. This dilemma is well known.

The estimated production time for a neighbourhood plan is said to be 1 to 2 years. Over the life span of the plan this will impact adversely on the authority's capability to produce its required housing numbers and achieve its policy goals.

It is essential therefore for the authority to have included a proposed change to establish a contingency plan within its Site Allocations plan to offset the lack of data and inaccurate assessments of Neighbourhood planning.

Finally the Core Strategy of WCC contains policies and proposals, which coupled with a fully functioning Neighbourhood planning system could bring about each settlement's community objectives.

Whiteparish (SBR PC 40) table 37 has proposed changes to the settlement boundary. The changes do not spring from a formal neighbourhood plan or a settlement boundary review. The parish council has yet to commence the formal process for a neighbourhood plan for their settlement. Other potential housing development sites are available locally

	<p>and were the resources available to assess them the proposed changes -H7 /E7 /F7 /H7 could be expanded. This situation will no doubt be found throughout the county!</p> <p>My thanks for the opportunity to provide you with these observations.</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>	574	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 902879	Urquhart Development and Management Services Ltd  <b>Person ID:</b> 902887	<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 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>	<p>Question 4 - Reference - Exam.01 .39 Schedule of Proposed Changes - (Sept 2018) -39 of 46 -WHITEPARISH and Exam / 02A.</p> <p>The consultation material is - in my view- not legally compliant because potential sites that lie within undefined or out of date settlement boundaries have not been subjected to a Sustainability Appraisal.</p> <p>In addition sufficient information on potential development sites within small settlements and the accuracy of existing settlement boundaries is unavailable to the planning authority.</p> <p>The Neighbourhood Planning Activity map - last updated in December 2018 - shows that out of a total of 257 settlements in the county only 24 has a formal neighbourhood plan.</p> <p>The low level of formal Neighbourhood plans for such a large part of the county, at this point in time, results in lost opportunities for home building and ineffective neighbourhood planning.</p> <p>The housing site selection process therefore is flawed and has not been positively prepared.</p> <p>The policy decision of the authority to review settlement boundaries as part of its housing programme and to rely on small settlements to establish development plans and boundaries county wide, raises questions as to the effectiveness and reliability of the proposed changes.</p>				

Wiltshire Council has the statutory responsibility for Neighbourhood planning consequently a strong connection between their settlement boundary reviews and the Neighbourhood plans - which the parish and Town council's can implement - has to be present.

The inability of many small villages - such as Whiteparish - to find the necessary volunteers and qualified village representatives to create forums, development plans, define settlement boundaries is a major challenge to them and the planning authority. This dilemma is well known.

The estimated production time for a neighbourhood plan is said to be 1 to 2 years. Over the life span of the plan this will impact adversely on the authority's capability to produce its required housing numbers and achieve its policy goals.

It is essential therefore for the authority to have included a proposed change to establish a contingency plan within its Site Allocations plan to offset the lack of data and inaccurate assessments of Neighbourhood planning.

Finally the Core Strategy of WCC contains policies and proposals, which coupled with a fully functioning Neighbourhood planning system could bring about each settlement's community objectives.

Whiteparish (SBR PC 40) table 37 has proposed changes to the settlement boundary. The changes do not spring from a formal neighbourhood plan or a settlement boundary review. The parish council has yet to commence the formal process for a neighbourhood plan for their settlement. Other potential housing development sites are available locally and were the resources available to assess them the proposed changes -H7 /E7 /F7 /H7 could be expanded. This situation will no doubt be found throughout the county!

My thanks for the opportunity to provide you with these observations.

<p><b>SA docs or HRA doc -</b> Please state which of the following matters this representation relates to:</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>Which evidence document -</b> Please state which of the following matters this representation relates to:</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</b> (Please see Objective)</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>	577	<b>Consultee</b> <b>Person ID:</b> 858632	<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>	Positively prepared Justified Effective Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	SBR 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>	<p>REF: SBR PC 32 GRID REFERENCE: G5 + G6 (see Page 15)</p> <p>SHLAA Site Ref No: 3407 land opp Tel. Exchange, Deverill Road, Sutton Veny, BA12 7BA</p> <p>THANK YOU FOR THE INVITATION TO BE CONSULTED ON THE EXAM01:</p> <p>We are one of the consultees that was missed off the database due to a 'technical error' so we welcome the 2nd call for consultation 10DEC18-22JAN19.</p> <p>We confirm that we wish our land, SHLAA Site No: 3407 to remain on the SHLAA TOP 01 + 02 register but please keep us updated. We welcome the opportunity to provide affordable housing for the community of Sutton Veny.</p> <p>PLEASE UPDATE OUR CONTACT DETAILS AS WE WISH TO BE KEPT INFORMED OF THIS CONSULTATION AND WOULD LIKE TO TAKE PART IN THE FORMAL PUBLIC HEARING IF/WHEN THE INSPECTOR COMMENSES THEM.</p> <p>OUR RESPONSE COMMENTS to the:</p> <p>Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes 22JAN19: SUTTON VENY SBR PC 32 Grid Reference: G5 + G6 SHLAA Site Ref No: 3407</p>				

1. Please include the land SHLAA Site Reference: 3407 within the Sutton Veny Settlement Boundary in accordance with the WHSAP/01 'The Plan', TOP01, TOP02, SCI 01, SCI 02 in order to make the Plan 'Sound' and Legally Compliant.

REASON - Point A: The Plan is unsound and is not legally compliant as the SHLAA Site Ref No: 3407 has not been included within the proposed changes to the Sutton Veny Settlement Boundary in accordance with: WHSAP/01, TOP01, TOP02, SCI 01, SCI 02, Sutton Veny Housing Needs Survey 2014, AONB Management Plan and Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended (see Point A further explanation below);

2. IN ORDER TO MAKE 'THE PLAN' SOUND AND LEGALLY COMPLIANT PLEASE REVIEW THE LAND AT:

SBR PC 32 Grid Reference G5+G6 SHLAA Site Ref: 3407 as this is a vacant brownfield site that has been 'STAGE 2b' assessed as having the potential to be sustainable, suitable, available, achievable and deliverable.

REASON: The Plan is unsound and is not legally compliant as the SHLAA Site No: 3407 is unjustifiably being constrained by the proposed TOP 02 STAGE 2b assessment (see Point A below), which states that even though Site No: 3407 meets criteria STAGES 1+2+2a, because the site is located in an AONB (see point B below) and the local primary school has reached capacity (see point C below) the SHLAA Site 3407 has to be removed and not be put forward for STAGES 3-4.

It therefore does not comply in accordance with: WHSAP/01, TOP01, TOP02, SCI 01, SCI 02, Sutton Veny Housing Needs Survey 2014, AONB Management Plan and Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended.

3. Statement of Community Involvement - In order to make 'The Plan' sound and legally compliant with the NPPF and proposed SCI 01 and SCI 02 policies, another Sutton Veny Housing Needs Survey 2019- 2022 needs to be conducted in order to update WHSAP/01, TOP 01 + 02 as the current Sutton Veny Housing Needs Survey 2014-2018 is now out of date and the Parish Council is 'silent' and does not wish to undertake the development of a Sutton Veny Neighbourhood Plan.

REASON: The Parish Council cannot be considered as representing the voice of the Sutton Veny community, only the Sutton Veny's Housing Needs Survey 2014 (see Point D below) should be considered as representing the communities' requirements for future housing in Sutton Veny. This community-led survey has been ignored. The survey identified an affordable housing need of 17 dwellings required from 2014-2018, the WHSAP/01 does not provide an adequate deliverable housing supply to meet this 'now out dated' identified housing need. Therefore the WHSAP/01 is unsound and is not legally compliant with the SCI 01 + SCI 02 as it has not and does not seek to adequately provide for this community-led affordable housing requirement.

The Sutton Veny Housing Needs Survey needs to be undertaken again to review the housing needs from 2019- 2022 in order for the Plan to adequately reflect and cater for the undersupply from 2014-2018 AND the predicted housing need required for the remainder of the Wiltshire Core Strategy 2006-2026.

Therefore the Plan WHSAP/01 is currently unsound and is not legally compliant with proposed policies SCI 01, SCI 02, TOP 01, TOP 02 or with the NPPF for community-led planning compliance.

4. In order to make 'The Plan' sound and legally compliant with the NPPF and the Self-Build Custom Build Act 2015, the proposed SCI 01 and SCI 02 policies and TOP 01 + TOP 02 need to: (a) hold a public consultation in order to establish the current level of Self-Build Custom Build community demand and

(b) ALL SHLAA Sites will need to be re-assessed for their suitability as Self-build Custom Build development sites, as smaller 'Removed' sites may be suitable for this option.

REASON: The WHSAP/01 AND EXAM/01 proposals are silent on the provision of Self-build Custom Build sites and make no mention of the Self-build Housing Register that Wiltshire Council are legally obliged to hold open for residents to register their demand and right to self-build in their locality (see Point E below).

SHLAA Site Ref: 3407 could also be considered as suitable for self-build provision if the Sutton Veny community were consulted on this – in May 2014, the Wiltshire Council officer for the Housing Needs Survey 2014 was specifically asked to include a Self-build demand question within the survey but the officer refused to include it and therefore has failed to consult in accordance with SCI 01 + SCI 02.

Therefore the Plan WHSAP/01 is currently unsound and is not legally compliant with its own policies SCI 01, SCI 02, TOP 01, TOP 02 or with the NPPF for community-led planning compliance and the Self-Build Custom Build Act 2015.

POINT A:

SHLAA Site Ref No: 3407 is immediately adjacent to the built form and the existing 2015 Settlement Boundary and is therefore 'sustainable' and has been appraised up to and including STAGE 2b. TOP 01 and TOP 02 STAGE 2b assessment on this site has established that SHLAA Site No. 3407 has the capacity to accommodate 9 dwellings and that it is 'Sustainable (Point A), Available, Achievable and Deliverable' in accordance with the WHSAP/01 The Plan and the NPPF NPPG.

Therefore, Site 3407 is well related to the village, surrounded by residential dwellings and is immediately adjacent to the Sutton Veny settlement boundary in accordance with TOP 01 Settlement Boundary Review Methodology and assessed under TOP 02 STAGE 2b which states:

(please note: as landowners we were not aware of this consultation so were not invited to take part but the underscore below are ours for emphasis of the points we would like to highlight):

TOP 01: Recreational or amenity space at the edge of settlements

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

#### CONCLUSION

7.23 There is a need for a subtle and more flexible approach. One that takes into account differences between settlements and consultation feedback and balances the need to control development with allowing for the growth of settlements. Therefore, the revised settlement boundary review methodology will include recreational or amenity spaces that relate more closely to the built environment. However, it will exclude those which relate more closely to the open countryside. Nevertheless, it is recognised that these decisions will often be a matter of officer judgement that depends on the individual circumstances.

We assert that SHLAA Site 3407 is a small parcel of land and relates more closely to the Sutton Veny built environment rather than the 'open countryside', as it is within the village limits, it is attached to the High Street and Village Green so would form a natural growth extension, it is already a part of the village infrastructure with the village green attached to the north of the site where it is sandwiched between market housing and 1990's affordable housing cul-de-sac; a public house 'Woolpack' within 100m just around the corner, it is located within 150 metres of bus stops, 300 metres from employment centre Longbridge Deverill Trading Estate and is also within walking distance of the primary school – 300 metres.

In order to make The Plan 'sound' and legally compliant, SHLAA Site Ref No: 3407 Grid Reference: G5 + G7 should be incorporated into the Sutton Veny Settlement Boundary to comply with the WHSAP01, TOP 01 7.22+7.23 public consultation feedback, SCI 01 Community Involvement, Sutton Veny Housing Needs Survey 2014 'Identified Housing Need' which asserts Sutton Veny's community voice for affordable housing in the absence of a Neighbourhood Plan and 'silent' Parish Council, Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended.

POINT B: SHLAA Site No: 3407 Removed as it is within the AONB

At STAGE 2b, Site 3404 was 'REMOVED' along with 3 other sites due to: 'Sutton Veny being within the AONB and that the Primary School is full to capacity with no expansion options available'.

'AONB MANAGEMENT PLAN FOR HOUSING DEVELOPMENT WITHIN SUTTON VENY AONB'

AONB Management Plan policies include recommendations for the provision of affordable housing within the AONB, which is allowed. Officers of the AONB consistently state in village planning application consultations that "the AONB

would be keen to see Affordable housing within new developments within the AONB Management Plan and to contribute to conserving and enhancing scenic beauty as emphasised in the NPPF”.

SHLAA Site No: 3407 has evidence and scope to respond to and observe its AONB status; this is a mildly contaminated 1970's landfill site which needs remediation in order to conserve the conservation area and AONB area in which it sits.

During previous planning applications to remediate this Site 3407, AONB Officers were invited for consultation and concluded that “the site is located on the edge of the settlement but is well related to the existing settlement boundary and therefore would have a very limited and insignificant impact on the wider AONB.”

TOP 02 states that land well related to the built form should be included within the settlement boundary, and the STAGE 1+2 site assessment for Site 3407 states it is sustainable and adjacent to the current and proposed Sutton Veny Settlement Boundary. Therefore, the STAGE 2b criteria to remove Site 3407 due to its location in the large village ‘Sutton Veny’ from STAGES 3+4 just because the village is within the AONB is unjustified as the Plan does not accord with the AONB Management Plan and the NPPF so is ‘unsound’ and not legally compliant.

#### POINT C: SUTTON VENY PRIMARY SCHOOL – CURRENTLY OVER CAPACITY WITH NO ROOM FOR EXPANSION

The STAGE 2b criteria to ‘remove’ large villages from STAGES 3+4, where the local primary school has reached capacity and has no room for expansion to accommodate new dwellings’ future residents, is unjustified and therefore ‘unsound’. No local or national policy states that housing development should be restricted or stopped just because a small local primary school has no ‘current’ capacity in its outdated buildings, especially where community-led identified housing need has been established. If the primary school has reached its limit, then land needs to be secured to enable it to increase in size in order to accommodate future families living in the sustainable affordable dwellings in the community. Sutton Veny’s community consultation via the Sutton Veny Housing Needs Survey 2014 asserts that affordable housing is required in Sutton Veny.

If the housing needs requirements in the survey had been met by now and delivered within the recommended 3 years from the survey date (2014-2018) new residents would just be starting to fill these starter dwellings. However, the ‘excuse’ of a primary school over capacity has not stopped 12 ‘market family sized housing’ from being granted full permission to proceed with building – although most families with primary school aged children will not be able to afford to buy one of these new market homes anyway so the school will not have to accommodate these future older residents.

Sutton Veny primary school may start to experience a reduction in new students, just as the other large villages are experiencing as 3 schools were stated in the TOP 01 + 02 as being under capacity, which means they will become financially unsustainable in Educational Provision terms in the near future. This could result in some of the schools amalgamating or closing altogether. Use it or lose it, this is happening throughout the UK.

The villages that have primary schools with capacity, highlights the fact that they are underutilised and are at threat of being 'run down' or 'closed' if they are not used. Sutton Veny's future new residents could feed into these underutilised existing schools to increase vibrancy. Most Sutton Veny children do not walk to school as there are no safe pathways to the primary school so most parents from the top of the village and/or other villages within the catchment area drive for safety reasons.

A sustainable school bus service could pick future Sutton Veny children up to take them to the neighbouring village primary schools located in Chapmanslade, Codford or Heytesbury. This would be financially 'cheaper' than building a completely new primary school in every large village and would also offer choice for parents in accordance with 'catchment area' policies. All secondary school children travel to Warminster for secondary school provision so a precedent has been set.

Utilise what is underutilised at present, and then plan to expand the most suitable village primary school provision in the future as new dwellings in the large villages are shared and built.

Alternatively, Site 3407 could provide Affordable Starter homes in accordance with the government's legislation for 'Starter Home Policy MAR15' and the 'Affordable Homes Programme' for independent emerging adults, older adults who have separated, older residents, or self-build starter homes along with a mixed tenure to cater for newly emerging families with younger children to ensure they are provided with a step-up into a secure tenure. This would reduce the impact on Sutton Veny primary school but provide a natural succession of future students when the current students move up into secondary schools.

Therefore, the STAGE 2b criteria to 'remove' Site 3407 because it is located in a large village which is: (a) located in the AONB and (b) the 'primary school is too small/no capacity to expand' from TOP 02's STAGES 3-4 is unjustified, which makes the Plan 'unsound' and not legally compliant with / in accordance with: WHSAP/01, TOP01, TOP02, SCI 01, SCI02, Sutton Veny Housing Needs Survey 2014, AONB Management Plan and Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended.

**POINT D: SCI 01 COMMUNITY INVOLVEMENT: 'SUTTON VENY HOUSING NEEDS ASSESSMENT 2014'**

Sutton Veny's Housing Needs Survey 2014, identified an affordable housing need of 17 dwellings which were required from 2014-2018, however, the WHSAP/01 does not provide an adequate deliverable housing supply to meet this 'now out dated' identified housing need. Therefore the WHSAP/01 is unsound and is not legally compliant with the SCI 01 + SCI 02 as it has not and does not seek to adequately provide for this community- led affordable housing requirement. The Housing Needs Survey needs to be undertaken again to review the housing needs from 2019-2022 in order for the Plan to adequately reflect and cater for the undersupply from 2014-2018 AND the predicted housing need required for the remainder of the Wiltshire Core Strategy 2006- 2026.

This identified housing need has not been provided for or met in the current WHSAP/01 and TOP 01+02. This identified, community consulted housing need has been ignored in planning applications that were received after the survey was

published and during the period of Dec 2013 to Jan 2019. Wiltshire Council Planning Depart and Sutton Veny Parish Council, both 'agreed' to grant permission to 12 Market only dwellings mainly in the 3 + 4 bed categories, contrary to the Housing Needs Survey 2014 recommendations for affordable 1 bed starter homes and 2 + 3 bed family homes. Even the Parish Council planning application consultations failed to challenge, request or just mention the Sutton Veny Housing Needs Survey 2014 evidence that affordable homes within the settlement boundary could be considered for these Sutton Veny planning applications – one of which was in the garden of a Grade II listed building owned by a Sutton Veny Parish Councillor.

What hope is there for securing affordable homes for local people and their families if Parish Councillors do not utilise community-led consultations to help inform them in their duty?

We challenge that the current and proposed Sutton Veny Settlement Boundary will only deliver market housing within its settlement boundary which excludes the right and equal of opportunity for low income families to secure affordable housing provision within the current and proposed Sutton Veny Settlement Boundary.

Therefore, the Plan WHSAP/01 is currently unsound and is not legally compliant with its own policies SCI 01, SCI 02, TOP 01, TOP 02, WHSAP/24 Equalities Impact Assessment July 2018 or with the NPPF for community- led planning compliance.

#### SCI 01+02 COMMUNITY INVOLVEMENT: SUTTON VENY PARISH COUNCIL

In all the Wiltshire Council-led public consultation on spatial planning within the Warminster Community Area the Sutton Veny Parish Council is 'silent' and has never responded to any of the consultations related to the Core Strategy 2026 or the SHLAA sites submitted for Sutton Veny – as a consequence Sutton Veny Parish Council cannot be considered as 'representing the voice of the Sutton Veny community'. Even more importantly, Sutton Veny Parish Council in their position of authority have not expressed the 'will' of the community's identified housing requirements detailed in the Sutton Veny Housing Needs Survey and Recommendations 2014, and has failed in its duty to secure affordable housing to meet this need. The SV Parish Council have also remained silent during planning applications for every single planning application they have been consulted on from Dec 2013 to 21st Jan 2019 following the publication of the community consulted Housing Needs Survey 2014.

Since Dec 2013 after the publication of the Housing Needs Survey Dec 2014, 12 market house dwellings have received planning approval and not one is for affordable housing and the Parish Council failed in its duty to assert the fact that affordable dwellings should be considered on these sites in order to meet the 'identified housing need' for Sutton Veny. Had these 12 dwellings (mainly 3 and 4 bed) been secured as affordable housing, they would have been located within the existing and proposed settlement boundary and the identified community led housing need of 2014 would have been met within the 3 years stipulated. No need to look elsewhere for affordable housing.

It is noted that a Sutton Veny Parish Councillor Mike Carroll secured a 2 bed market house within his 'garden' curtilage which will be built right next to his Grade II listed property. A Parish Councillor who has consistently remained silent on

all consultations and the requirement for affordable housing for his own community of Sutton Veny. Sutton Veny Parish Councillors do not wish to produce their own Neighbourhood Plan, the current WHSAP/01 is very helpful to confine Market Only houses within the 'confines' of the constricted existing and proposed Settlement Boundary and in their eyes works very well thank you, to suit their own financial needs whilst preventing lower 'social class' citizens the right to an affordable home within the settlement boundary of Sutton Veny.

This evidence supports the fact that the Plan WHSAP/01 is not sound or legally compliant, as local citizens requiring a roof over their heads, that is affordable and within their means, IS NOT POSSIBLE in Sutton Veny as the WHSAP/01 Plan is to exclude citizens from their village and translocate them to other towns OR, if an 'exception site' was ever really possible, to the outside of the settlement boundary where they belong in a ghetto estate of a 1000+ houses. This amounts to discrimination with no right to 'equality' within the WHSAP/24 Equalities Impact Statement July 2018 or the NPPF.

Therefore the Plan WHSAP/01 is currently unsound and is not legally compliant with its own policies SCI 01, SCI 02, TOP 01, TOP 02, WHSAP/24 or with the NPPF for community-led planning compliance.

#### POINT E: SELF-BUILD AND CUSTOM BUILD PROVISION

The WHSAP/01 AND EXAM/01 are silent on the provision of Self-build sites and make no mention of the Self-build Housing Register that Wiltshire Council are legally obliged to hold open for residents to register their demand and right to self-build in their locality.

SHLAA Site Ref: 3407 could also be considered as suitable for self-build provision if the Sutton Veny community were consulted on this. In May 2014 the Wiltshire Council officer for the Housing Needs Survey 2014 was specifically asked to include a self-build demand question within the survey but the officer refused to include it and therefore has failed to consult in accordance with SCI 01 + SCI 02.

Whilst there appears to be an online mention of Wiltshire Council's Self-build housing register for residents to submit their form, there is no other mention of how many people have requested self-build sites on the website or within WHSAP/01 and supporting documents. TOP 01 and TOP 02 do not mention the suitability of SHLAA sites to be considered for self-build – this could be an ideal opportunity to look at sites that were discounted via the STAGES 1-4 process as the sites may be perfect for small affordable self-builders to utilise and help meet the locally identified housing needs in small and large villages.

It can be asserted that the WHSAP/01 Plan has not established the demand for self-build/custom build AND has not considered or planned for self-build sites that would satisfy this demand.

Therefore, the WHSAP/01 Plan is not sound and is not legally compliant with the NPPF and the Self-build Custom Build Act 2015 as stated:



In 2015 Brandon Lewis Minister of State for Housing and Planning (at the time) stated in his letter to Council Leaders in March 2015: 'National planning policy and guidance is clear that local planning authorities should identify and plan for local demand for custom and self build housing. Planning inspectors will want to see evidence that consideration of demand for custom and self build housing has been taken into account when they examine Local Plans. Failure to provide sufficient evidence may lead to plans being found unsound.'

This letter sets out the government's commitment to growing custom and self build housing in England, and Wiltshire Council has to take this factor into account now that the Self-Build and Custom Housebuilding Act 2015 has become law. Brandon Lewis' letter highlights the initiatives government has launched in order to help deliver homes people actually want throughout the next parliament, initiatives which has cross-party support. These included:

- Placing a strong emphasis in planning policy and guidance on local authorities accounting for custom and self build when preparing their Local Plans
- Identifying government-owned sites for custom and self build development
- Providing £150m repayable finance to developers and other organisations to bring forward up to 10,000 serviced custom build plots over the next six years
- Engaging with lenders to increase the number of custom and self build mortgages available
- Exempting custom and self builders from the Community Infrastructure Levy
- Introducing a 10-unit threshold for Section 106 Affordable Housing Contributions to boost opportunities for custom and self builders

Brandon Lewis stated in Mar 2015: 'The full Right to Build initiative will only be legislated for in the next Parliament. In the meantime Richard Bacon MP has allowed us the opportunity to work with him on his Self- Build and Custom Housebuilding Private Members' Bill to bring forward legislation in this Parliament to establish a key foundation of the Right – the establishment of local registers of custom and self builders who wish to acquire a suitable plot of land to build their own home. The Bill will also require local authorities to have regard to the demand on their local register when exercising their planning and other relevant functions.'

22nd January 2019: OUR COMMENTS REGARDING WHY WE FEEL THE PLAN IS CURRENTLY NOT 'SOUND' OR LEGALLY COMPLIANT':

We welcome the 'chance' to participate in this consultation, as we are one of the consultees who was not informed of this consultation AND 3 prior consultations between May 2015 to 10th Dec 2018! This contravenes our right to be consulted as landowners within Sutton Veny, all our contact details were supplied on the Wiltshire Councils Consultation

Portal following our last submission in March 2015; our contact details were also provided on the 'Call for Sites' submission form, where Old Quarry Copse land opp. Tel.Exc Deverill Rd (SHLAA 3407) was submitted following the public call for sites. Although our site was received by Wiltshire Council, the only correspondence we have received following submission of our land was an email from Spatial Planning stating that as our land did not have the capacity for more than 50 houses our site would not be considered.

Due to employment, we do not live in the Wiltshire planning area which means we do not have regular access to local advertising outlets that Wiltshire Council relied upon to advertise this (and previous) consultations. As Spatial Planning had dismissed our site in the early pre-submission stages AND as we had provided our contact details to be kept informed, we had assumed that as the Core Strategy had been adopted in 2015, 'that was that'.

We therefore rely wholly on Wiltshire Council contacting and updating us when planning consultations are sought. We have repeatedly given our contact details and repeatedly stated that we wish to take part in all planning consultations that affect our land. It has to be acknowledged that this 'technical error' has denied us our right to be consulted.

Now that we have been notified in Dec 2018 of our 'deletion' from the consultation process, it appears that we have been repeatedly 'missed' from public consultation AND from personal consultation about the inclusion of our land SHLAA Site No:3407 on publically produced documents that we had no knowledge of.

This is clearly in contravention of SCI 01 'Statement of community involvement' and SCI 02 'Statement of early community involvement' – based purely on this point makes the WHSAP/01 Plan 'Unsound' and 'Not Legally Compliant'. It appears there were hundreds of consultees missed from this current consultation, but were they also 'missed' from earlier consultations due to 'technical errors'?

With respect, the Inspector needs to consider this evidence, as significant consultees were not party to or even had knowledge of this consultation, previous consultations (including Landowner consultation) from May 2015 onwards; and (more worryingly) landowner's land included in documentation that they were not fully aware of, informed of/consulted with or engaged with during the TOP 01 AND TOP 02 Site selection process and inclusion.

**22nd January 2019: IMPACT ON CONSULTEES AFFECTED BY THE 'TECHNICAL ERROR' WHICH OMITTED CONSULTEES FROM THIS CONSULTATION:**

As landowners for SHLAA Site No: 3407, we have heard nothing since the Spatial Planning email in 2015 stating our land Site No: 3407 would not be considered as it did not have the capacity for over 50+ dwellings: we have received no updates as to our lands inclusion in WHSAP/01 and that it had been considered via a 1-4 STAGE process; we have received no invitation to the 3 consultations that followed including a consultation with landowners.

On 2nd March 2016, Matthew Perks, Planning Officer for Wiltshire Council sent us a letter saying that he was 'withdrawing' our planning application for the Sutton Veny Rural Exception Site for affordable housing, which is against policy and procedure. It was out understanding that the 'applicant' only has the right to 'withdraw' their application NOT

the Planning Authority. Wiltshire Council's Planning 'Withdrawal' letter has not been added to our application documents on the Wiltshire Councils Planning Portal neither has our objection letters to their decision to withdraw our application, which have never been responded to. Clearly, Wiltshire Council does not want Rural Exception Sites for Affordable Housing even if it is in their Wiltshire Core Strategy 2026.

So imagine our surprise to receive an email out of the blue in December 2018 telling us that we have been overlooked due to a 'technical error' for this current consultation.

Despite it being Christmas and New Year 2019, we dutifully ploughed through all these planning documents and yesterday 20th January 2019, we discovered that not only had our land Site No: 3407 been earmarked in maps contained in the WHSAP/01 Plan, but it has been appraised in accordance with TOP01 and TOP02 and had been 'REMOVED' for consideration at Table E.1 STAGE 2b. We had absolutely no knowledge of this.

However, we are where we are. We confirm that we wish our land, SHLAA Site No: 3407 to remain on the SHLAA register but please keep us updated. We welcome the opportunity to provide affordable housing for the community of Sutton Veny.

Thank you for reading our consultation submission, if you have managed to read this far, we appreciate your time as it's a lot to wade through.

FOR INFORMATION, BELOW IS AN EXTRACT FROM OUR MARCH 2015 CONSULTATION SUBMISSION:

Please note: The information below collated ALL of the Housing Needs Surveys in Large and Small villages in the Warminster Community Area as at March 2015. This community-led identified Housing Need has not been provided for in the proposed WHSAP/01, only site provision for 32 'remainder' market dwellings are being sought. We haven't been able to find a complete breakdown of all the Warminster Community Area Housing Needs Surveys in the WHSAP/01 as this should have been included in the document as housing need evidence. This is in contravention of SCI 01+02.

Extract: 'TOTAL IDENTIFIED HOUSING NEED (in Warminster Community Area) by applying either:

1. A 'conservative' projection of an estimated 106 units required 2014-2026, multiplied by 3 = 318
  2. The Sutton Veny Housing Need Survey author's projection: An estimated 106 units required 2014- 2026, multiplied by 4 = 424'
- This would be in addition to the 900 dwellings that have been allocated to the west of Warminster town itself.

- It would not be enough to state that all of these identified households who have been identified through a Housing Needs Survey for a small or large village in the Warminster area will have to accept being 'transferred' to Warminster town strategic allocation site, in order to be housed.

- There are 8 Small villages and 5 Large villages in the Warminster Community Area – the 5 Large Villages were identified in the Wiltshire Core Strategy 2026 as being part of the Settlement Hierarchy and would be allocated just 49 Indicative Requirement of extra dwellings across the entire plan period. These are Market Housing, not affordable.

- Given that a minimum of 318-424 affordable dwellings have been identified as being 'required' by Wiltshire Council's own assessments, this is a considerable shortfall.

- The 5 Large Villages in Warminster Community Area are: Chapmanslade, Codford, Corsely, Heytesbury, Sutton Veny

- ALL of these Large Villages which are located in sustainable locations and which could support a modest number of dwellings to meet identified local housing need, have now been excluded from this 'Draft Informal Consultation on Initial Site Options' contrary to the WCS 2026 Settlement Hierarchy.

- To suggest that this major affordable housing need shortfall in Warminster Community Area will only be allocated 49 dwellings from now until 2026, will be secured via 'windfall sites' that have to be located 'within' the current outdated Settlement Boundary is contrary to the national policy of sustainable development – which is at the heart of the NPPF.

The current out-of-date Settlement Boundaries can only support the odd 1-2 'windfall' dwellings coming forward at a time – this can be proved via analysis of permitted planning applications over the past 30 years (which we have conducted and submitted to you during the Parish Consultations for Sutton Veny); and as sites below 10 dwellings cannot be chased for s106 affordable housing contributions anymore, where are affordable housing sites going to be built WITHIN the outdated Settlement Boundaries in order to meet this identified VILLAGE housing need of 318-424 dwellings for Warminster Community Area?

- It is not acceptable to suggest that no affordable housing will ever be provided for in the Large Villages;

- it is not acceptable to plan for village householders to have to be relocated to Warminster only;

- it will not be acceptable to 'hope' that windfall exception sites for 100% affordable housing will be coming forward in their droves to make 'an exception to policy' to enable affordable housing to be built OUTSIDE the outdated Settlement Boundaries. If this is the hope then Wiltshire Council is not providing good governance and preparedness for the accumulation of households who are in need of affordable housing in the localities that they have a local connection with.

- Wiltshire Council have systematically failed to deliver the affordable housing provision over the past 10 years, this was noted by the Examining Inspector in his final summing up.

The Inspector's observation is borne out in Sutton Veny, where 2 Housing Needs Surveys were conducted: 1 in 2005 – no affordable houses were ever built to-date, despite Wiltshire Council's Housing Survey author recommending that 5 affordable dwellings needed to be built between 2005-2008; the 2nd Housing Needs survey has just been completed in Dec 2014, but only 4 Social housing is recommended – a downgrading despite resident's responses requiring more, and 72% of residents in support of new housing in the village (in stark contrast to the Parish Council's lack of support), an additional 12 households currently on the housing register for Sutton Veny was also not taken into account. A minimum total of 17 dwellings are now required in Sutton Veny, with no site allocated to provide for this primary sourced, identified housing need.

A small site in Sutton Veny, which is sustainably located in accordance with the NPPF and the WCS 2026, is available, achievable with a high level of deliverability, is currently going through planning as a rare 'exception site for affordable housing' but this application has taken over 18months to assess in planning – longer than most large scale development sites. The site was also submitted following the Calls for Sites exercise but because it can only provide up to 5 dwellings it has been removed by the 'Draft methodology' because it is below the 50+ dwelling threshold. It has not been assessed in accordance with the Calls for Sites Proforma Terms and Conditions.

Therefore if Wiltshire is expecting that windfall sites will come forward to provide 100% Affordable Housing in perpetuity, but take over 18mths to process 'exception site' applications, landowners will have to assess if it is worth all the time and effort before submitting a site as an exception in order to provide locally needed homes.

Hence the need for a 'flexible development plan' that will respond to 'identified housing need' in 'all' locations

- whether Principal Towns, Market Towns, Local Service Centre or Large and even Small Villages by identifying 'sustainable, available potentially achievable and deliverable' development sites, large or small, within each locality where housing is required. This will enable a strong robust development strategy that is backed up by primary sourced evidence informed by local communities.

At the moment it appears that this exercise of consultation is trying to justify changing the newly adopted WCS 2026 in order to just about satisfy the Inspector's requirements of increasing land supply evidence and seeming to undertake 'settlement boundary' revision to demonstrate enough allocation of space; whilst trying to minimise any actual change to the restrictive outdated Settlement Boundaries which will never enable a 'flexible planned response to identified and emerging housing need until 2026'.

(please see attachment for plan)

**SA docs or HRA doc -  
Please state which of the**

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

<p><b>following matters this representation relates to:</b></p>		<p><b>or the Habitats Regulation Assessment Addendum (September 2018).</b></p>	
<p><b>Which evidence document - Please state which of the following matters 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>5258457</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>	578	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	
		<b>Person ID:</b> 858632	<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>SA docs or HRA doc - Please state which of the following matters this representation relates to:</b>			<b>Please give details of 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>Which evidence document - Please state which of the following matters 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>	REF: SBR PC 32 GR ID REFERENCE: G5 + G6 (see Page 15)				

**associated evidence documents.**

SHLAA Site Ref No: 3407 land opp Tel. Exchange, Deverill Road, Sutton Veny, BA12 7BA

THANK YOU FOR THE INVITATION TO BE CONSULTED ON THE EXAM01:

We are one of the consultees that was missed off the database due to a 'technical error' so we welcome the 2nd call for consultation 10DEC18-22JAN19.

We confirm that we wish our land, SHLAA Site No: 3407 to remain on the SHLAA TOP 01 + 02 register but please keep us updated. We welcome the opportunity to provide affordable housing for the community of Sutton Veny.

PLEASE UPDATE OUR CONTACT DETAILS AS WE WISH TO BE KEPT INFORMED OF THIS CONSULTATION AND WOULD LIKE TO TAKE PART IN THE FORMAL PUBLIC HEARING IF/WHEN THE INSPECTOR COMMENCES THEM.

OUR RESPONSE COMMENTS to the:

Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes 22JAN19: SUTTON VENY SBR PC 32 Grid Reference: G5 + G6 SHLAA Site Ref No: 3407

1. Please include the land SHLAA Site Reference: 3407 within the Sutton Veny Settlement Boundary in accordance with the WHSAP/01 'The Plan', TOP01, TOP02, SCI 01, SCI 02 in order to make the Plan 'Sound' and Legally Compliant.

REASON - Point A: The Plan is unsound and is not legally compliant as the SHLAA Site Ref No: 3407 has not been included within the proposed changes to the Sutton Veny Settlement Boundary in accordance with: WHSAP/01, TOP01, TOP02, SCI 01, SCI 02, Sutton Veny Housing Needs Survey 2014, AONB Management Plan and Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended (see Point A further explanation below);

2. IN ORDER TO MAKE 'THE PLAN' SOUND AND LEGALLY COMPLIANT PLEASE REVIEW THE LAND AT:

SBR PC 32 Grid Reference G5+G6 SHLAA Site Ref: 3407 as this is a vacant brownfield site that has been 'STAGE 2b' assessed as having the potential to be sustainable, suitable, available, achievable and deliverable.

REASON: The Plan is unsound and is not legally compliant as the SHLAA Site No: 3407 is unjustifiably being constrained by the proposed TOP 02 STAGE 2b assessment (see Point A below), which states that even though Site No: 3407 meets criteria STAGES 1+2+2a, because the site is



located in an AONB (see point B below) and the local primary school has reached capacity (see point C below) the SHLAA Site 3407 has to be removed and not be put forward for STAGES 3-4.

It therefore does not comply in accordance with: WHSAP/01, TOP01, TOP02, SCI 01, SCI 02, Sutton Veny Housing Needs Survey 2014, AONB Management Plan and Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended.

3. Statement of Community Involvement - In order to make 'The Plan' sound and legally compliant with the NPPF and proposed SCI 01 and SCI 02 policies, another Sutton Veny Housing Needs Survey 2019- 2022 needs to be conducted in order to update WHSAP/01, TOP 01 + 02 as the current Sutton Veny Housing Needs Survey 2014-2018 is now out of date and the Parish Council is 'silent' and does not wish to undertake the development of a Sutton Veny Neighbourhood Plan.

REASON: The Parish Council cannot be considered as representing the voice of the Sutton Veny community, only the Sutton Veny's Housing Needs Survey 2014 (see Point D below) should be considered as representing the communities' requirements for future housing in Sutton Veny. This community-led survey has been ignored. The survey identified an affordable housing need of 17 dwellings required from 2014-2018, the WHSAP/01 does not provide an adequate deliverable housing supply to meet this 'now out dated' identified housing need. Therefore the WHSAP/01 is unsound and is not legally compliant with the SCI 01 + SCI 02 as it has not and does not seek to adequately provide for this community-led affordable housing requirement.

The Sutton Veny Housing Needs Survey needs to be undertaken again to review the housing needs from 2019- 2022 in order for the Plan to adequately reflect and cater for the undersupply from 2014-2018 AND the predicted housing need required for the remainder of the Wiltshire Core Strategy 2006-2026.

Therefore the Plan WHSAP/01 is currently unsound and is not legally compliant with proposed policies SCI 01, SCI 02, TOP 01, TOP 02 or with the NPPF for community-led planning compliance.

4. In order to make 'The Plan' sound and legally compliant with the NPPF and the Self-Build Custom Build Act 2015, the proposed SCI 01 and SCI 02 policies and TOP 01 + TOP 02 need to: (a) hold a public consultation in order to establish the current level of Self-Build Custom Build community demand and

(b) ALL SHLAA Sites will need to be re-assessed for their suitability as Self-build Custom Build development sites, as smaller 'Removed' sites may be suitable for this option.

REASON: The WHSAP/01 AND EXAM/01 proposals are silent on the provision of Self-build Custom Build sites and make no mention of the Self-build Housing Register that Wiltshire Council are legally obliged to hold open for residents to register their demand and right to self-build in their locality (see Point E below).

SHLAA Site Ref: 3407 could also be considered as suitable for self-build provision if the Sutton Veny community were consulted on this – in May 2014, the Wiltshire Council officer for the Housing Needs Survey 2014 was specifically asked to include a Self-build demand question within the survey but the officer refused to include it and therefore has failed to consult in accordance with SCI 01 + SCI 02.

Therefore the Plan WHSAP/01 is currently unsound and is not legally compliant with its own policies SCI 01, SCI 02, TOP 01, TOP 02 or with the NPPF for community-led planning compliance and the Self-Build Custom Build Act 2015.

POINT A:

SHLAA Site Ref No: 3407 is immediately adjacent to the built form and the existing 2015 Settlement Boundary and is therefore 'sustainable' and has been appraised up to and including STAGE 2b. TOP 01 and TOP 02 STAGE 2b assessment on this site has established that SHLAA Site No. 3407 has the capacity to accommodate 9 dwellings and that it is 'Sustainable (Point A), Available, Achievable and Deliverable' in accordance with the WHSAP/01 The Plan and the NPPF NPPG.

Therefore, Site 3407 is well related to the village, surrounded by residential dwellings and is immediately adjacent to the Sutton Veny settlement boundary in accordance with TOP 01 Settlement Boundary Review Methodology and assessed under TOP 02 STAGE 2b which states:

(please note: as landowners we were not aware of this consultation so were not invited to take part but the underscore below are ours for emphasis of the points we would like to highlight):

TOP 01: Recreational or amenity space at the edge of settlements

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

CONCLUSION

7.23 There is a need for a subtle and more flexible approach. One that takes into account differences between settlements and consultation feedback and balances the need to control development with allowing for the growth of settlements. Therefore, the revised settlement boundary review methodology will include recreational or amenity spaces that relate more closely to the built environment. However, it will exclude those which relate more closely to the open countryside. Nevertheless, it is recognised that these decisions will often be a matter of officer judgement that depends on the individual circumstances.

We assert that SHLAA Site 3407 is a small parcel of land and relates more closely to the Sutton Veny built environment rather than the 'open countryside', as it is within the village limits, it is attached to the High Street and Village Green so would form a natural growth extension, it is already a part of the village infrastructure with the village green attached to the north of the site where it is sandwiched between market housing and 1990's affordable housing cul-de-sac; a public house 'Woolpack' within 100m just around the corner, it is located within 150 metres of bus stops, 300 metres from employment centre Longbridge Deverill Trading Estate and is also within walking distance of the primary school – 300 metres.

In order to make The Plan 'sound' and legally compliant, SHLAA Site Ref No: 3407 Grid Reference: G5 + G7 should be incorporated into the Sutton Veny Settlement Boundary to comply with the WHSAP01, TOP 01 7.22+7.23 public consultation feedback, SCI 01 Community Involvement, Sutton Veny Housing Needs Survey 2014 'Identified Housing Need' which asserts Sutton Veny's community voice for affordable housing in the absence of a Neighbourhood Plan and 'silent' Parish Council, Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended.

POINT B: SHLAA Site No: 3407 Removed as it is within the AONB

At STAGE 2b, Site 3404 was 'REMOVED' along with 3 other sites due to: 'Sutton Veny being within the AONB and that the Primary School is full to capacity with no expansion options available'.

'AONB MANAGEMENT PLAN FOR HOUSING DEVELOPMENT WITHIN SUTTON VENY AONB'

AONB Management Plan policies include recommendations for the provision of affordable housing within the AONB, which is allowed. Officers of the AONB consistently state in village planning application consultations that "the AONB would be keen to see Affordable housing within new developments within the AONB Management Plan and to contribute to conserving and enhancing scenic beauty as emphasised in the NPPF".

SHLAA Site No: 3407 has evidence and scope to respond to and observe its AONB status; this is a mildly contaminated 1970's landfill site which needs remediation in order to conserve the conservation area and AONB area in which it sits.

During previous planning applications to remediate this Site 3407, AONB Officers were invited for consultation and concluded that “the site is located on the edge of the settlement but is well related to the existing settlement boundary and therefore would have a very limited and insignificant impact on the wider AONB.”

TOP 02 states that land well related to the built form should be included within the settlement boundary, and the STAGE 1+2 site assessment for Site 3407 states it is sustainable and adjacent to the current and proposed Sutton Veny Settlement Boundary. Therefore, the STAGE 2b criteria to remove Site 3407 due to its location in the large village ‘Sutton Veny’ from STAGES 3+4 just because the village is within the AONB is unjustified as the Plan does not accord with the AONB Management Plan and the NPPF so is ‘unsound’ and not legally compliant.

#### POINT C: SUTTON VENY PRIMARY SCHOOL – CURRENTLY OVER CAPACITY WITH NO ROOM FOR EXPANSION

The STAGE 2b criteria to ‘remove’ large villages from STAGES 3+4, where the local primary school has reached capacity and has no room for expansion to accommodate new dwellings’ future residents, is unjustified and therefore ‘unsound’. No local or national policy states that housing development should be restricted or stopped just because a small local primary school has no ‘current’ capacity in its outdated buildings, especially where community-led identified housing need has been established. If the primary school has reached its limit, then land needs to be secured to enable it to increase in size in order to accommodate future families living in the sustainable affordable dwellings in the community. Sutton Veny’s community consultation via the Sutton Veny Housing Needs Survey 2014 asserts that affordable housing is required in Sutton Veny.

If the housing needs requirements in the survey had been met by now and delivered within the recommended 3 years from the survey date (2014-2018) new residents would just be starting to fill these starter dwellings. However, the ‘excuse’ of a primary school over capacity has not stopped 12 ‘market family sized housing’ from being granted full permission to proceed with building – although most families with primary school aged children will not be able to afford to buy one of these new market homes anyway so the school will not have to accommodate these future older residents.

Sutton Veny primary school may start to experience a reduction in new students, just as the other large villages are experiencing as 3 schools were stated in the TOP 01 + 02 as being under capacity, which means they will become financially unsustainable in Educational Provision terms in the near future. This could result in some of the schools amalgamating or closing altogether. Use it or lose it, this is happening throughout the UK.

The villages that have primary schools with capacity, highlights the fact that they are underutilised and are at threat of being ‘run down’ or ‘closed’ if they are not used. Sutton Veny’s future new residents could feed into these underutilised existing schools to increase vibrancy. Most Sutton Veny children do not walk to school as there are no safe pathways to the primary school so most parents from the top of the village and/or other villages within the catchment area drive for safety reasons.

A sustainable school bus service could pick future Sutton Veny children up to take them to the neighbouring village primary schools located in Chapmanslade, Codford or Heytesbury. This would be financially 'cheaper' than building a completely new primary school in every large village and would also offer choice for parents in accordance with 'catchment area' policies. All secondary school children travel to Warminster for secondary school provision so a precedent has been set.

Utilise what is underutilised at present, and then plan to expand the most suitable village primary school provision in the future as new dwellings in the large villages are shared and built.

Alternatively, Site 3407 could provide Affordable Starter homes in accordance with the government's legislation for 'Starter Home Policy MAR15' and the 'Affordable Homes Programme' for independent emerging adults, older adults who have separated, older residents, or self-build starter homes along with a mixed tenure to cater for newly emerging families with younger children to ensure they are provided with a step-up into a secure tenure. This would reduce the impact on Sutton Veny primary school but provide a natural succession of future students when the current students move up into secondary schools.

Therefore, the STAGE 2b criteria to 'remove' Site 3407 because it is located in a large village which is: (a) located in the AONB and (b) the 'primary school is too small/no capacity to expand' from TOP 02's STAGES 3-4 is unjustified, which makes the Plan 'unsound' and not legally compliant with / in accordance with: WHSAP/01, TOP01, TOP02, SCI 01, SCI02, Sutton Veny Housing Needs Survey 2014, AONB Management Plan and Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended.

POINT D: SCI 01 COMMUNITY INVOLVEMENT: 'SUTTON VENY HOUSING NEEDS ASSESSMENT 2014'

Sutton Veny's Housing Needs Survey 2014, identified an affordable housing need of 17 dwellings which were required from 2014-2018, however, the WHSAP/01 does not provide an adequate deliverable housing supply to meet this 'now out dated' identified housing need. Therefore the WHSAP/01 is unsound and is not legally compliant with the SCI 01 + SCI 02 as it has not and does not seek to adequately provide for this community- led affordable housing requirement. The Housing Needs Survey needs to be undertaken again to review the housing needs from 2019-2022 in order for the Plan to adequately reflect and cater for the undersupply from 2014-2018 AND the predicted housing need required for the remainder of the Wiltshire Core Strategy 2006- 2026.

This identified housing need has not been provided for or met in the current WHSAP/01 and TOP 01+02. This identified, community consulted housing need has been ignored in planning applications that were received after the survey was published and during the period of Dec 2013 to Jan 2019. Wiltshire Council Planning Depart and Sutton Veny Parish Council, both 'agreed' to grant permission to 12 Market only dwellings mainly in the 3 + 4 bed categories, contrary to the Housing Needs Survey 2014 recommendations for affordable 1 bed starter homes and 2 + 3 bed family homes. Even the Parish Council planning application consultations failed to challenge, request or just mention the Sutton Veny

Housing Needs Survey 2014 evidence that affordable homes within the settlement boundary could be considered for these Sutton Veny planning applications – one of which was in the garden of a Grade II listed building owned by a Sutton Veny Parish Councillor.

What hope is there for securing affordable homes for local people and their families if Parish Councillors do not utilise community-led consultations to help inform them in their duty?

We challenge that the current and proposed Sutton Veny Settlement Boundary will only deliver market housing within its settlement boundary which excludes the right and equal of opportunity for low income families to secure affordable housing provision within the current and proposed Sutton Veny Settlement Boundary.

Therefore, the Plan WHSAP/01 is currently unsound and is not legally compliant with its own policies SCI 01, SCI 02, TOP 01, TOP 02, WHSAP/24 Equalities Impact Assessment July 2018 or with the NPPF for community- led planning compliance.

#### SCI 01+02 COMMUNITY INVOLVEMENT: SUTTON VENY PARISH COUNCIL

In all the Wiltshire Council-led public consultation on spatial planning within the Warminster Community Area the Sutton Veny Parish Council is 'silent' and has never responded to any of the consultations related to the Core Strategy 2026 or the SHLAA sites submitted for Sutton Veny – as a consequence Sutton Veny Parish Council cannot be considered as 'representing the voice of the Sutton Veny community'. Even more importantly, Sutton Veny Parish Council in their position of authority have not expressed the 'will' of the community's identified housing requirements detailed in the Sutton Veny Housing Needs Survey and Recommendations 2014, and has failed in its duty to secure affordable housing to meet this need. The SV Parish Council have also remained silent during planning applications for every single planning application they have been consulted on from Dec 2013 to 21st Jan 2019 following the publication of the community consulted Housing Needs Survey 2014.

Since Dec 2013 after the publication of the Housing Needs Survey Dec 2014, 12 market house dwellings have received planning approval and not one is for affordable housing and the Parish Council failed in its duty to assert the fact that affordable dwellings should be considered on these sites in order to meet the 'identified housing need' for Sutton Veny. Had these 12 dwellings (mainly 3 and 4 bed) been secured as affordable housing, they would have been located within the existing and proposed settlement boundary and the identified community led housing need of 2014 would have been met within the 3 years stipulated. No need to look elsewhere for affordable housing.

It is noted that a Sutton Veny Parish Councillor Mike Carroll secured a 2 bed market house within his 'garden' curtilage which will be built right next to his Grade II listed property. A Parish Councillor who has consistently remained silent on all consultations and the requirement for affordable housing for his own community of Sutton Veny. Sutton Veny Parish Councillors do not wish to produce their own Neighbourhood Plan, the current WHSAP/01 is very helpful to confine Market Only houses within the 'confines' of the constricted existing and proposed Settlement

Boundary and in their eyes works very well thank you, to suit their own financial needs whilst preventing lower 'social class' citizens the right to an affordable home within the settlement boundary of Sutton Veny.

This evidence supports the fact that the Plan WHSAP/01 is not sound or legally compliant, as local citizens requiring a roof over their heads, that is affordable and within their means, IS NOT POSSIBLE in Sutton Veny as the WHSAP/01 Plan is to exclude citizens from their village and translocate them to other towns OR, if an 'exception site' was ever really possible, to the outside of the settlement boundary where they belong in a ghetto estate of a 1000+ houses. This amounts to discrimination with no right to 'equality' within the WHSAP/24 Equalities Impact Statement July2018 or the NPPF.

Therefore the Plan WHSAP/01 is currently unsound and is not legally compliant with its own policies SCI 01, SCI 02, TOP 01, TOP 02, WHSAP/24 or with the NPPF for community-led planning compliance.

#### POINT E: SELF-BUILD AND CUSTOM BUILD PROVISION

The WHSAP/01 AND EXAM/01 are silent on the provision of Self-build sites and make no mention of the Self- build Housing Register that Wiltshire Council are legally obliged to hold open for residents to register their demand and right to self-build in their locality.

SHLAA Site Ref: 3407 could also be considered as suitable for self-build provision if the Sutton Veny community were consulted on this. In May 2014 the Wiltshire Council officer for the Housing Needs Survey 2014 was specifically asked to include a self-build demand question within the survey but the officer refused to include it and therefore has failed to consult in accordance with SCI 01 + SCI 02.

Whilst there appears to be an online mention of Wiltshire Council's Self-build housing register for residents to submit their form, there is no other mention of how many people have requested self-build sites on the website or within WHSAP/01 and supporting documents. TOP 01 and TOP 02 do not mention the suitability of SHLAA sites to be considered for self-build – this could be an ideal opportunity to look at sites that were discounted via the STAGES 1-4 process as the sites may be perfect for small affordable self-builders to utilise and help meet the locally identified housing needs in small and large villages.

It can be asserted that the WHSAP/01 Plan has not established the demand for self-build/custom build AND has not considered or planned for self-build sites that would satisfy this demand.

Therefore, the WHSAP/01 Plan is not sound and is not legally compliant with the NPPF and the Self-build Custom Build Act 2015 as stated:

In 2015 Brandon Lewis Minister of State for Housing and Planning (at the time) stated in his letter to Council Leaders in March 2015: 'National planning policy and guidance is clear that local planning authorities should identify and plan for local demand for custom and self build housing.'

Planning inspectors will want to see evidence that consideration of demand for custom and self build housing has been taken into account when they examine Local Plans. Failure to provide sufficient evidence may lead to plans being found unsound.'

This letter sets out the government's commitment to growing custom and self build housing in England, and Wiltshire Council has to take this factor into account now that the Self-Build and Custom Housebuilding Act 2015 has become law. Brandon Lewis' letter highlights the initiatives government has launched in order to help deliver homes people actually want throughout the next parliament, initiatives which has cross-party support. These included:

- Placing a strong emphasis in planning policy and guidance on local authorities accounting for custom and self build when preparing their Local Plans
- Identifying government-owned sites for custom and self build development
- Providing £150m repayable finance to developers and other organisations to bring forward up to 10,000 serviced custom build plots over the next six years
- Engaging with lenders to increase the number of custom and self build mortgages available
- Exempting custom and self builders from the Community Infrastructure Levy
- Introducing a 10-unit threshold for Section 106 Affordable Housing Contributions to boost opportunities for custom and self builders

Brandon Lewis stated in Mar 2015: 'The full Right to Build initiative will only be legislated for in the next Parliament. In the meantime Richard Bacon MP has allowed us the opportunity to work with him on his Self- Build and Custom Housebuilding Private Members' Bill to bring forward legislation in this Parliament to establish a key foundation of the Right – the establishment of local registers of custom and self builders who wish to acquire a suitable plot of land to build their own home. The Bill will also require local authorities to have regard to the demand on their local register when exercising their planning and other relevant functions.'

22nd January 2019: OUR COMMENTS REGARDING WHY WE FEEL THE PLAN IS CURRENTLY NOT 'SOUND' OR LEGALLY COMPLIANT':

We welcome the 'chance' to participate in this consultation, as we are one of the consultees who was not informed of this consultation AND 3 prior consultations between May 2015 to 10th Dec 2018! This contravenes our right to be consulted as landowners within Sutton Veny, all our contact details were supplied on the Wiltshire Councils Consultation Portal following our last submission in March 2015; our contact details were also provided on the 'Call for Sites' submission form, where Old Quarry Copse land opp. Tel.Exc Deverill Rd (SHLAA 3407) was submitted



following the public call for sites. Although our site was received by Wiltshire Council, the only correspondence we have received following submission of our land was an email from Spatial Planning stating that as our land did not have the capacity for more than 50 houses our site would not be considered.

Due to employment, we do not live in the Wiltshire planning area which means we do not have regular access to local advertising outlets that Wiltshire Council relied upon to advertise this (and previous) consultations. As Spatial Planning had dismissed our site in the early pre-submission stages AND as we had provided our contact details to be kept informed, we had assumed that as the Core Strategy had been adopted in 2015, 'that was that'.

We therefore rely wholly on Wiltshire Council contacting and updating us when planning consultations are sought. We have repeatedly given our contact details and repeatedly stated that we wish to take part in all planning consultations that affect our land. It has to be acknowledged that this 'technical error' has denied us our right to be consulted.

Now that we have been notified in Dec 2018 of our 'deletion' from the consultation process, it appears that we have been repeatedly 'missed' from public consultation AND from personal consultation about the inclusion of our land SHLAA Site No:3407 on publically produced documents that we had no knowledge of.

This is clearly in contravention of SCI 01 'Statement of community involvement' and SCI 02 'Statement of early community involvement' – based purely on this point makes the WHSAP/01 Plan 'Unsound' and 'Not Legally Compliant'. It appears there were hundreds of consultees missed from this current consultation, but were they also 'missed' from earlier consultations due to 'technical errors'?

With respect, the Inspector needs to consider this evidence, as significant consultees were not party to or even had knowledge of this consultation, previous consultations (including Landowner consultation) from May 2015 onwards; and (more worryingly) landowner's land included in documentation that they were not fully aware of, informed of/consulted with or engaged with during the TOP 01 AND TOP 02 Site selection process and inclusion.

22nd January 2019: IMPACT ON CONSULTEES AFFECTED BY THE 'TECHNICAL ERROR' WHICH OMITTED CONSULTEES FROM THIS CONSULTATION:

As landowners for SHLAA Site No: 3407, we have heard nothing since the Spatial Planning email in 2015 stating our land Site No: 3407 would not be considered as it did not have the capacity for over 50+ dwellings: we have received no updates as to our lands inclusion in WHSAP/01 and that it had been considered via a 1-4 STAGE process; we have received no invitation to the 3 consultations that followed including a consultation with landowners.

On 2nd March 2016, Matthew Perks, Planning Officer for Wiltshire Council sent us a letter saying that he was 'withdrawing' our planning application for the Sutton Veny Rural Exception Site for affordable housing, which is against policy and procedure. It was out understanding that the 'applicant' only has the right to 'withdraw' their application NOT the Planning Authority. Wiltshire Council's Planning 'Withdrawal' letter has not been added to our application documents on the Wiltshire Councils Planning Portal neither has our objection letters to their decision to withdraw our application, which have never been responded to. Clearly, Wiltshire Council does not want Rural Exception Sites for Affordable Housing even if it is in their Wiltshire Core Strategy 2026.

So imagine our surprise to receive an email out of the blue in December 2018 telling us that we have been overlooked due to a 'technical error' for this current consultation.

Despite it being Christmas and New Year 2019, we dutifully ploughed through all these planning documents and yesterday 20th January 2019, we discovered that not only had our land Site No: 3407 been earmarked in maps contained in the WHSAP/01 Plan, but it has been appraised in accordance with TOP01 and TOP02 and had been 'REMOVED' for consideration at Table E.1 STAGE 2b. We had absolutely no knowledge of this.

However, we are where we are. We confirm that we wish our land, SHLAA Site No: 3407 to remain on the SHLAA register but please keep us updated. We welcome the opportunity to provide affordable housing for the community of Sutton Veny.

Thank you for reading our consultation submission, if you have managed to read this far, we appreciate your time as it's a lot to wade through.

FOR INFORMATION, BELOW IS AN EXTRACT FROM OUR MARCH 2015 CONSULTATION SUBMISSION:

Please note: The information below collated ALL of the Housing Needs Surveys in Large and Small villages in the Warminster Community Area as at March 2015. This community-led identified Housing Need has not been provided for in the proposed WHSAP/01, only site provision for 32 'remainder' market dwellings are being sought. We haven't been able to find a complete breakdown of all the Warminster Community Area Housing Needs Surveys in the WHSAP/01 as this should have been included in the document as housing need evidence. This is in contravention of SCI 01+02.

Extract: 'TOTAL IDENTIFIED HOUSING NEED (in Warminster Community Area) by applying either:

1. A 'conservative' projection of an estimated 106 units required 2014-2026, multiplied by 3 = 318

2. The Sutton Veny Housing Need Survey author's projection: An estimated 106 units required 2014- 2026, multiplied by 4 = 424'

- This would be in addition to the 900 dwellings that have been allocated to the west of Warminster town itself.
- It would not be enough to state that all of these identified households who have been identified through a Housing Needs Survey for a small or large village in the Warminster area will have to accept being 'transferred' to Warminster town strategic allocation site, in order to be housed.
- There are 8 Small villages and 5 Large villages in the Warminster Community Area – the 5 Large Villages were identified in the Wiltshire Core Strategy 2026 as being part of the Settlement Hierarchy and would be allocated just 49 Indicative Requirement of extra dwellings across the entire plan period. These are Market Housing, not affordable.
- Given that a minimum of 318-424 affordable dwellings have been identified as being 'required' by Wiltshire Council's own assessments, this is a considerable shortfall.
- The 5 Large Villages in Warminster Community Area are: Chapmanslade, Codford, Corsely, Heytesbury, Sutton Veny
- ALL of these Large Villages which are located in sustainable locations and which could support a modest number of dwellings to meet identified local housing need, have now been excluded from this 'Draft Informal Consultation on Initial Site Options' contrary to the WCS 2026 Settlement Hierarchy.
- To suggest that this major affordable housing need shortfall in Warminster Community Area will only be allocated 49 dwellings from now until 2026, will be secured via 'windfall sites' that have to be located 'within' the current outdated Settlement Boundary is contrary to the national policy of sustainable development – which is at the heart of the NPPF.

The current out-of-date Settlement Boundaries can only support the odd 1-2 'windfall' dwellings coming forward at a time – this can be proved via analysis of permitted planning applications over the past 30 years (which we have conducted and submitted to you during the Parish Consultations for Sutton Veny); and as sites below 10 dwellings cannot be chased for s106 affordable housing contributions anymore, where are affordable housing sites going to be built WITHIN the outdated Settlement Boundaries in order to meet this identified VILLAGE housing need of 318-424 dwellings for Warminster Community Area?

- It is not acceptable to suggest that no affordable housing will ever be provided for in the Large Villages;
- it is not acceptable to plan for village householders to have to be relocated to Warminster only;

- it will not be acceptable to 'hope' that windfall exception sites for 100% affordable housing will be coming forward in their droves to make 'an exception to policy' to enable affordable housing to be built OUTSIDE the outdated Settlement Boundaries. If this is the hope then Wiltshire Council is not providing good governance and preparedness for the accumulation of households who are in need of affordable housing in the localities that they have a local connection with.

- Wiltshire Council have systematically failed to deliver the affordable housing provision over the past 10 years, this was noted by the Examining Inspector in his final summing up.

The Inspector's observation is borne out in Sutton Veny, where 2 Housing Needs Surveys were conducted: 1 in 2005 – no affordable houses were ever built to-date, despite Wiltshire Council's Housing Survey author recommending that 5 affordable dwellings needed to be built between 2005-2008; the 2nd Housing Needs survey has just been completed in Dec 2014, but only 4 Social housing is recommended – a downgrading despite resident's responses requiring more, and 72% of residents in support of new housing in the village (in stark contrast to the Parish Council's lack of support), an additional 12 households currently on the housing register for Sutton Veny was also not taken into account. A minimum total of 17 dwellings are now required in Sutton Veny, with no site allocated to provide for this primary sourced, identified housing need.

A small site in Sutton Veny, which is sustainably located in accordance with the NPPF and the WCS 2026, is available, achievable with a high level of deliverability, is currently going through planning as a rare 'exception site for affordable housing' but this application has taken over 18months to assess in planning – longer than most large scale development sites. The site was also submitted following the Calls for Sites exercise but because it can only provide up to 5 dwellings it has been removed by the 'Draft methodology' because it is below the 50+ dwelling threshold. It has not been assessed in accordance with the Calls for Sites Proforma Terms and Conditions.

Therefore if Wiltshire is expecting that windfall sites will come forward to provide 100% Affordable Housing in perpetuity, but take over 18mths to process 'exception site' applications, landowners will have to assess if it is worth all the time and effort before submitting a site as an exception in order to provide locally needed homes.

Hence the need for a 'flexible development plan' that will respond to 'identified housing need' in 'all' locations

- whether Principal Towns, Market Towns, Local Service Centre or Large and even Small Villages by identifying 'sustainable, available potentially achievable and deliverable' development sites, large or small, within each locality where housing is required. This will enable a strong robust development strategy that is backed up by primary sourced evidence informed by local communities.

At the moment it appears that this exercise of consultation is trying to justify changing the newly adopted WCS 2026 in order to just about satisfy the Inspector's requirements of increasing land supply evidence and seeming to undertake 'settlement boundary' revision to demonstrate enough

	<p>allocation of space; whilst trying to minimise any actual change to the restrictive outdated Settlement Boundaries which will never enable a 'flexible planned response to identified and emerging housing need until 2026'.</p> <p>(please see attachment for plan)</p>		
<p><b>Supporting documents (Please see Objective)</b></p>	<p>5258457</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>	579	<b>Consultee</b>	<b>Agent</b>	<b>Do you consider the Proposed Change to be legally compliant?</b>	No
		<b>Person ID:</b> 858632	<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>	Positively prepared Justified Effective Consistent with national policy	
<b>Identify Proposed Change Reference Number</b>	Out of scope				
<b>Please give details of why you support or do not support the consultation material. Please let us know whether you think the consultation material is sound and legally compliant, and if not why not</b>	<p>REF: SBR PC 32 GRID REFERENCE: G5 + G6 (see Page 15) SHLAA Site Ref No: 3407 land opp Tel. Exchange, Deverill Road, Sutton Veny, BA12 7BA</p> <p>THANK YOU FOR THE INVITATION TO BE CONSULTED ON THE EXAM01:</p> <p>We are one of the consultees that was missed off the database due to a 'technical error' so we welcome the 2nd call for consultation 10DEC18-22JAN19.</p> <p>We confirm that we wish our land, SHLAA Site No: 3407 to remain on the SHLAA TOP 01 + 02 register but please keep us updated. We welcome the opportunity to provide affordable housing for the community of Sutton Veny.</p> <p>PLEASE UPDATE OUR CONTACT DETAILS AS WE WISH TO BE KEPT INFORMED OF THIS CONSULTATION AND WOULD LIKE TO TAKE PART IN THE FORMAL PUBLIC HEARING IF/WHEN THE INSPECTOR COMMENSES THEM.</p> <p>OUR RESPONSE COMMENTS to the: Wiltshire Housing Site Allocations Plan Schedule of Proposed Changes 22JAN19: SUTTON VENY SBR PC 32 Grid Reference: G5 + G6 SHLAA Site Ref No: 3407</p>				

1. Please include the land SHLAA Site Reference: 3407 within the Sutton Veny Settlement Boundary in accordance with the WHSAP/01 'The Plan', TOP01, TOP02, SCI 01, SCI 02 in order to make the Plan 'Sound' and Legally Compliant.

REASON - Point A: The Plan is unsound and is not legally compliant as the SHLAA Site Ref No: 3407 has not been included within the proposed changes to the Sutton Veny Settlement Boundary in accordance with: WHSAP/01, TOP01, TOP02, SCI 01, SCI 02, Sutton Veny Housing Needs Survey 2014, AONB Management Plan and Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended (see Point A further explanation below);

2. IN ORDER TO MAKE 'THE PLAN' SOUND AND LEGALLY COMPLIANT PLEASE REVIEW THE LAND AT:  
SBR PC 32 Grid Reference G5+G6 SHLAA Site Ref: 3407 as this is a vacant brownfield site that has been 'STAGE 2b' assessed as having the potential to be sustainable, suitable, available, achievable and deliverable.

REASON: The Plan is unsound and is not legally compliant as the SHLAA Site No: 3407 is unjustifiably being constrained by the proposed TOP 02 STAGE 2b assessment (see Point A below), which states that even though Site No: 3407 meets criteria STAGES 1+2+2a, because the site is located in an AONB (see point B below) and the local primary school has reached capacity (see point C below) the SHLAA Site 3407 has to be removed and not be put forward for STAGES 3-4.

It therefore does not comply in accordance with: WHSAP/01, TOP01, TOP02, SCI 01, SCI 02, Sutton Veny Housing Needs Survey 2014, AONB Management Plan and Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended.

3. Statement of Community Involvement - In order to make 'The Plan' sound and legally compliant with the NPPF and proposed SCI 01 and SCI 02 policies, another Sutton Veny Housing Needs Survey 2019- 2022 needs to be conducted in order to update WHSAP/01, TOP 01 + 02 as the current Sutton Veny Housing Needs Survey 2014-2018 is now out of date and the Parish Council is 'silent' and does not wish to undertake the development of a Sutton Veny Neighbourhood Plan.

REASON: The Parish Council cannot be considered as representing the voice of the Sutton Veny community, only the Sutton Veny's Housing Needs Survey 2014 (see Point D below) should be considered as representing the communities' requirements for future housing in Sutton Veny. This community-led survey has been ignored. The survey identified an affordable housing need of 17 dwellings required from 2014-2018, the WHSAP/01 does not provide an adequate deliverable housing supply to meet this 'now out dated' identified housing need. Therefore the WHSAP/01 is unsound and is not legally compliant with the SCI 01 + SCI 02 as it has not and does not seek to adequately provide for this community-led affordable housing requirement.

The Sutton Veny Housing Needs Survey needs to be undertaken again to review the housing needs from 2019- 2022 in order for the Plan to adequately reflect and cater for the undersupply from 2014-2018 AND the predicted housing need required for the remainder of the Wiltshire Core Strategy 2006-2026.

Therefore the Plan WHSAP/01 is currently unsound and is not legally compliant with proposed policies SCI 01, SCI 02, TOP 01, TOP 02 or with the NPPF for community-led planning compliance.

4. In order to make 'The Plan' sound and legally compliant with the NPPF and the Self-Build Custom Build Act 2015, the proposed SCI 01 and SCI 02 policies and TOP 01 + TOP 02 need to: (a) hold a public consultation in order to establish the current level of Self-Build Custom Build community demand and (b) ALL SHLAA Sites will need to be re-assessed for their suitability as Self-build Custom Build development sites, as smaller 'Removed' sites may be suitable for this option.

REASON: The WHSAP/01 AND EXAM/01 proposals are silent on the provision of Self-build Custom Build sites and make no mention of the Self-build Housing Register that Wiltshire Council are legally obliged to hold open for residents to register their demand and right to self-build in their locality (see Point E below).

SHLAA Site Ref: 3407 could also be considered as suitable for self-build provision if the Sutton Veny community were consulted on this – in May 2014, the Wiltshire Council officer for the Housing Needs Survey 2014 was specifically asked to include a Self-build demand question within the survey but the officer refused to include it and therefore has failed to consult in accordance with SCI 01 + SCI 02.

Therefore the Plan WHSAP/01 is currently unsound and is not legally compliant with its own policies SCI 01, SCI 02, TOP 01, TOP 02 or with the NPPF for community-led planning compliance and the Self-Build Custom Build Act 2015.

POINT A:

SHLAA Site Ref No: 3407 is immediately adjacent to the built form and the existing 2015 Settlement Boundary and is therefore 'sustainable' and has been appraised up to and including STAGE 2b. TOP 01 and TOP 02 STAGE 2b assessment on this site has established that SHLAA Site No. 3407 has the capacity to accommodate 9 dwellings and that it is 'Sustainable (Point A), Available, Achievable and Deliverable' in accordance with the WHSAP/01 The Plan and the NPPF NPPG.

Therefore, Site 3407 is well related to the village, surrounded by residential dwellings and is immediately adjacent to the Sutton Veny settlement boundary in accordance with TOP 01 Settlement Boundary Review Methodology and assessed under TOP 02 STAGE 2b which states:



(please note: as landowners we were not aware of this consultation so were not invited to take part but the underscore below are ours for emphasis of the points we would like to highlight):

TOP 01: Recreational or amenity space at the edge of settlements

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

#### CONCLUSION

7.23 There is a need for a subtle and more flexible approach. One that takes into account differences between settlements and consultation feedback and balances the need to control development with allowing for the growth of settlements. Therefore, the revised settlement boundary review methodology will include recreational or amenity spaces that relate more closely to the built environment. However, it will exclude those which relate more closely to the open countryside. Nevertheless, it is recognised that these decisions will often be a matter of officer judgement that depends on the individual circumstances.

We assert that SHLAA Site 3407 is a small parcel of land and relates more closely to the Sutton Veny built environment rather than the 'open countryside', as it is within the village limits, it is attached to the High Street and Village Green so would form a natural growth extension, it is already a part of the village infrastructure with the village green attached to the north of the site where it is sandwiched between market housing and 1990's affordable housing cul-de-sac; a public house 'Woolpack' within 100m just around the corner, it is located within 150 metres of bus stops, 300 metres from employment centre Longbridge Deverill Trading Estate and is also within walking distance of the primary school – 300 metres.

In order to make The Plan 'sound' and legally compliant, SHLAA Site Ref No: 3407 Grid Reference: G5 + G7 should be incorporated into the Sutton Veny Settlement Boundary to comply with the WHSAP01, TOP 01 7.22+7.23 public consultation feedback, SCI 01 Community Involvement, Sutton Veny Housing Needs Survey 2014 'Identified Housing Need' which asserts Sutton Veny's community voice for affordable housing in the absence of a Neighbourhood Plan and 'silent' Parish Council, Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended.

POINT B: SHLAA Site No: 3407 Removed as it is within the AONB

At STAGE 2b, Site 3404 was 'REMOVED' along with 3 other sites due to: 'Sutton Veny being within the AONB and that the Primary School is full to capacity with no expansion options available'.

## 'AONB MANAGEMENT PLAN FOR HOUSING DEVELOPMENT WITHIN SUTTON VENY AONB'

AONB Management Plan policies include recommendations for the provision of affordable housing within the AONB, which is allowed. Officers of the AONB consistently state in village planning application consultations that "the AONB would be keen to see Affordable housing within new developments within the AONB Management Plan and to contribute to conserving and enhancing scenic beauty as emphasised in the NPPF".

SHLAA Site No: 3407 has evidence and scope to respond to and observe its AONB status; this is a mildly contaminated 1970's landfill site which needs remediation in order to conserve the conservation area and AONB area in which it sits.

During previous planning applications to remediate this Site 3407, AONB Officers were invited for consultation and concluded that "the site is located on the edge of the settlement but is well related to the existing settlement boundary and therefore would have a very limited and insignificant impact on the wider AONB."

TOP 02 states that land well related to the built form should be included within the settlement boundary, and the STAGE 1+2 site assessment for Site 3407 states it is sustainable and adjacent to the current and proposed Sutton Veny Settlement Boundary. Therefore, the STAGE 2b criteria to remove Site 3407 due to its location in the large village 'Sutton Veny' from STAGES 3+4 just because the village is within the AONB is unjustified as the Plan does not accord with the AONB Management Plan and the NPPF so is 'unsound' and not legally compliant.

### POINT C: SUTTON VENY PRIMARY SCHOOL – CURRENTLY OVER CAPACITY WITH NO ROOM FOR EXPANSION

The STAGE 2b criteria to 'remove' large villages from STAGES 3+4, where the local primary school has reached capacity and has no room for expansion to accommodate new dwellings' future residents, is unjustified and therefore 'unsound'. No local or national policy states that housing development should be restricted or stopped just because a small local primary school has no 'current' capacity in its outdated buildings, especially where community-led identified housing need has been established. If the primary school has reached its limit, then land needs to be secured to enable it to increase in size in order to accommodate future families living in the sustainable affordable dwellings in the community. Sutton Veny's community consultation via the Sutton Veny Housing Needs Survey 2014 asserts that affordable housing is required in Sutton Veny.

If the housing needs requirements in the survey had been met by now and delivered within the recommended 3 years from the survey date (2014-2018) new residents would just be starting to fill these starter dwellings. However, the 'excuse' of a primary school over capacity has not stopped 12 'market family sized housing' from being granted full permission to proceed with building – although most families with primary school aged children will not be able to afford to buy one of these new market homes anyway so the school will not have to accommodate these future older residents.

Sutton Veny primary school may start to experience a reduction in new students, just as the other large villages are experiencing as 3 schools were stated in the TOP 01 + 02 as being under capacity, which means they will become

financially unsustainable in Educational Provision terms in the near future. This could result in some of the schools amalgamating or closing altogether. Use it or lose it, this is happening throughout the UK.

The villages that have primary schools with capacity, highlights the fact that they are underutilised and are at threat of being 'run down' or 'closed' if they are not used. Sutton Veny's future new residents could feed into these underutilised existing schools to increase vibrancy. Most Sutton Veny children do not walk to school as there are no safe pathways to the primary school so most parents from the top of the village and/or other villages within the catchment area drive for safety reasons.

A sustainable school bus service could pick future Sutton Veny children up to take them to the neighbouring village primary schools located in Chapmanslade, Codford or Heytesbury. This would be financially 'cheaper' than building a completely new primary school in every large village and would also offer choice for parents in accordance with 'catchment area' policies. All secondary school children travel to Warminster for secondary school provision so a precedent has been set.

Utilise what is underutilised at present, and then plan to expand the most suitable village primary school provision in the future as new dwellings in the large villages are shared and built.

Alternatively, Site 3407 could provide Affordable Starter homes in accordance with the government's legislation for 'Starter Home Policy MAR15' and the 'Affordable Homes Programme' for independent emerging adults, older adults who have separated, older residents, or self-build starter homes along with a mixed tenure to cater for newly emerging families with younger children to ensure they are provided with a step-up into a secure tenure. This would reduce the impact on Sutton Veny primary school but provide a natural succession of future students when the current students move up into secondary schools.

Therefore, the STAGE 2b criteria to 'remove' Site 3407 because it is located in a large village which is: (a) located in the AONB and (b) the 'primary school is too small/no capacity to expand' from TOP 02's STAGES 3-4 is unjustified, which makes the Plan 'unsound' and not legally compliant with / in accordance with: WHSAP/01, TOP01, TOP02, SCI 01, SCI02, Sutton Veny Housing Needs Survey 2014, AONB Management Plan and Para 17 NPPF 2012 and Self-Build and Custom Build Act 2015 as amended.

POINT D: SCI 01 COMMUNITY INVOLVEMENT: 'SUTTON VENY HOUSING NEEDS ASSESSMENT 2014'

Sutton Veny's Housing Needs Survey 2014, identified an affordable housing need of 17 dwellings which were required from 2014-2018, however, the WHSAP/01 does not provide an adequate deliverable housing supply to meet this 'now out dated' identified housing need. Therefore the WHSAP/01 is unsound and is not legally compliant with the SCI 01 + SCI 02 as it has not and does not seek to adequately provide for this community- led affordable housing requirement. The Housing Needs Survey needs to be undertaken again to review the housing needs from 2019-2022 in order for the

Plan to adequately reflect and cater for the undersupply from 2014-2018 AND the predicted housing need required for the remainder of the Wiltshire Core Strategy 2006- 2026.

This identified housing need has not been provided for or met in the current WHSAP/01 and TOP 01+02. This identified, community consulted housing need has been ignored in planning applications that were received after the survey was published and during the period of Dec 2013 to Jan 2019. Wiltshire Council Planning Depart and Sutton Veny Parish Council, both 'agreed' to grant permission to 12 Market only dwellings mainly in the 3 + 4 bed categories, contrary to the Housing Needs Survey 2014 recommendations for affordable 1 bed starter homes and 2 + 3 bed family homes. Even the Parish Council planning application consultations failed to challenge, request or just mention the Sutton Veny Housing Needs Survey 2014 evidence that affordable homes within the settlement boundary could be considered for these Sutton Veny planning applications – one of which was in the garden of a Grade II listed building owned by a Sutton Veny Parish Councillor.

What hope is there for securing affordable homes for local people and their families if Parish Councillors do not utilise community-led consultations to help inform them in their duty?

We challenge that the current and proposed Sutton Veny Settlement Boundary will only deliver market housing within its settlement boundary which excludes the right and equal of opportunity for low income families to secure affordable housing provision within the current and proposed Sutton Veny Settlement Boundary.

Therefore, the Plan WHSAP/01 is currently unsound and is not legally compliant with its own policies SCI 01, SCI 02, TOP 01, TOP 02, WHSAP/24 Equalities Impact Assessment July 2018 or with the NPPF for community- led planning compliance.

#### SCI 01+02 COMMUNITY INVOLVEMENT: SUTTON VENY PARISH COUNCIL

In all the Wiltshire Council-led public consultation on spatial planning within the Warminster Community Area the Sutton Veny Parish Council is 'silent' and has never responded to any of the consultations related to the Core Strategy 2026 or the SHLAA sites submitted for Sutton Veny – as a consequence Sutton Veny Parish Council cannot be considered as 'representing the voice of the Sutton Veny community'. Even more importantly, Sutton Veny Parish Council in their position of authority have not expressed the 'will' of the community's identified housing requirements detailed in the Sutton Veny Housing Needs Survey and Recommendations 2014, and has failed in its duty to secure affordable housing to meet this need. The SV Parish Council have also remained silent during planning applications for every single planning application they have been consulted on from Dec 2013 to 21st Jan 2019 following the publication of the community consulted Housing Needs Survey 2014.

Since Dec 2013 after the publication of the Housing Needs Survey Dec 2014, 12 market house dwellings have received planning approval and not one is for affordable housing and the Parish Council failed in its duty to assert the fact that affordable dwellings should be considered on these sites in order to meet the 'identified housing need' for Sutton Veny. Had these 12 dwellings (mainly 3 and 4 bed) been secured as affordable housing, they would have been located within

the existing and proposed settlement boundary and the identified community led housing need of 2014 would have been met within the 3 years stipulated. No need to look elsewhere for affordable housing.

It is noted that a Sutton Veny Parish Councillor Mike Carroll secured a 2 bed market house within his 'garden' curtilage which will be built right next to his Grade II listed property. A Parish Councillor who has consistently remained silent on all consultations and the requirement for affordable housing for his own community of Sutton Veny. Sutton Veny Parish Councillors do not wish to produce their own Neighbourhood Plan, the current WHSAP/01 is very helpful to confine Market Only houses within the 'confines' of the constricted existing and proposed Settlement Boundary and in their eyes works very well thank you, to suit their own financial needs whilst preventing lower 'social class' citizens the right to an affordable home within the settlement boundary of Sutton Veny.

This evidence supports the fact that the Plan WHSAP/01 is not sound or legally compliant, as local citizens requiring a roof over their heads, that is affordable and within their means, IS NOT POSSIBLE in Sutton Veny as the WHSAP/01 Plan is to exclude citizens from their village and translocate them to other towns OR, if an 'exception site' was ever really possible, to the outside of the settlement boundary where they belong in a ghetto estate of a 1000+ houses. This amounts to discrimination with no right to 'equality' within the WHSAP/24 Equalities Impact Statement July 2018 or the NPPF.

Therefore the Plan WHSAP/01 is currently unsound and is not legally compliant with its own policies SCI 01, SCI 02, TOP 01, TOP 02, WHSAP/24 or with the NPPF for community-led planning compliance.

#### POINT E: SELF-BUILD AND CUSTOM BUILD PROVISION

The WHSAP/01 AND EXAM/01 are silent on the provision of Self-build sites and make no mention of the Self-build Housing Register that Wiltshire Council are legally obliged to hold open for residents to register their demand and right to self-build in their locality.

SHLAA Site Ref: 3407 could also be considered as suitable for self-build provision if the Sutton Veny community were consulted on this. In May 2014 the Wiltshire Council officer for the Housing Needs Survey 2014 was specifically asked to include a self-build demand question within the survey but the officer refused to include it and therefore has failed to consult in accordance with SCI 01 + SCI 02.

Whilst there appears to be an online mention of Wiltshire Council's Self-build housing register for residents to submit their form, there is no other mention of how many people have requested self-build sites on the website or within WHSAP/01 and supporting documents. TOP 01 and TOP 02 do not mention the suitability of SHLAA sites to be considered for self-build – this could be an ideal opportunity to look at sites that were discounted via the STAGES 1-4 process as the sites may be perfect for small affordable self-builders to utilise and help meet the locally identified housing needs in small and large villages.

It can be asserted that the WHSAP/01 Plan has not established the demand for self-build/custom build AND has not considered or planned for self-build sites that would satisfy this demand.

Therefore, the WHSAP/01 Plan is not sound and is not legally compliant with the NPPF and the Self-build Custom Build Act 2015 as stated:

In 2015 Brandon Lewis Minister of State for Housing and Planning (at the time) stated in his letter to Council Leaders in March 2015: 'National planning policy and guidance is clear that local planning authorities should identify and plan for local demand for custom and self build housing. Planning inspectors will want to see evidence that consideration of demand for custom and self build housing has been taken into account when they examine Local Plans. Failure to provide sufficient evidence may lead to plans being found unsound.'

This letter sets out the government's commitment to growing custom and self build housing in England, and Wiltshire Council has to take this factor into account now that the Self-Build and Custom Housebuilding Act 2015 has become law. Brandon Lewis' letter highlights the initiatives government has launched in order to help deliver homes people actually want throughout the next parliament, initiatives which has cross-party support. These included:

- Placing a strong emphasis in planning policy and guidance on local authorities accounting for custom and self build when preparing their Local Plans
- Identifying government-owned sites for custom and self build development
- Providing £150m repayable finance to developers and other organisations to bring forward up to 10,000 serviced custom build plots over the next six years
- Engaging with lenders to increase the number of custom and self build mortgages available
- Exempting custom and self builders from the Community Infrastructure Levy
- Introducing a 10-unit threshold for Section 106 Affordable Housing Contributions to boost opportunities for custom and self builders

Brandon Lewis stated in Mar 2015: 'The full Right to Build initiative will only be legislated for in the next Parliament. In the meantime Richard Bacon MP has allowed us the opportunity to work with him on his Self- Build and Custom Housebuilding Private Members' Bill to bring forward legislation in this Parliament to establish a key foundation of the Right – the establishment of local registers of custom and self builders who wish to acquire a suitable plot of land to build their own home. The Bill will also require local authorities to have regard to the demand on their local register when exercising their planning and other relevant functions.'

22nd January 2019: OUR COMMENTS REGARDING WHY WE FEEL THE PLAN IS CURRENTLY NOT 'SOUND' OR LEGALLY COMPLIANT':

We welcome the 'chance' to participate in this consultation, as we are one of the consultees who was not informed of this consultation AND 3 prior consultations between May 2015 to 10th Dec 2018! This contravenes our right to be consulted as landowners within Sutton Veny, all our contact details were supplied on the Wiltshire Councils Consultation

Portal following our last submission in March 2015; our contact details were also provided on the 'Call for Sites' submission form, where Old Quarry Copse land opp. Tel.Exc Deverill Rd (SHLAA 3407) was submitted following the public call for sites. Although our site was received by Wiltshire Council, the only correspondence we have received following submission of our land was an email from Spatial Planning stating that as our land did not have the capacity for more than 50 houses our site would not be considered.

Due to employment, we do not live in the Wiltshire planning area which means we do not have regular access to local advertising outlets that Wiltshire Council relied upon to advertise this (and previous) consultations. As Spatial Planning had dismissed our site in the early pre-submission stages AND as we had provided our contact details to be kept informed, we had assumed that as the Core Strategy had been adopted in 2015, 'that was that'.

We therefore rely wholly on Wiltshire Council contacting and updating us when planning consultations are sought. We have repeatedly given our contact details and repeatedly stated that we wish to take part in all planning consultations that affect our land. It has to be acknowledged that this 'technical error' has denied us our right to be consulted.

Now that we have been notified in Dec 2018 of our 'deletion' from the consultation process, it appears that we have been repeatedly 'missed' from public consultation AND from personal consultation about the inclusion of our land SHLAA Site No:3407 on publically produced documents that we had no knowledge of.

This is clearly in contravention of SCI 01 'Statement of community involvement' and SCI 02 'Statement of early community involvement' – based purely on this point makes the WHSAP/01 Plan 'Unsound' and 'Not Legally Compliant'. It appears there were hundreds of consultees missed from this current consultation, but were they also 'missed' from earlier consultations due to 'technical errors'?

With respect, the Inspector needs to consider this evidence, as significant consultees were not party to or even had knowledge of this consultation, previous consultations (including Landowner consultation) from May 2015 onwards; and (more worryingly) landowner's land included in documentation that they were not fully aware of, informed of/consulted with or engaged with during the TOP 01 AND TOP 02 Site selection process and inclusion.

#### 22nd January 2019: IMPACT ON CONSULTEES AFFECTED BY THE 'TECHNICAL ERROR' WHICH OMITTED CONSULTEES FROM THIS CONSULTATION:

As landowners for SHLAA Site No: 3407, we have heard nothing since the Spatial Planning email in 2015 stating our land Site No: 3407 would not be considered as it did not have the capacity for over 50+ dwellings: we have received no updates as to our lands inclusion in WHSAP/01 and that it had been considered via a 1-4 STAGE process; we have received no invitation to the 3 consultations that followed including a consultation with landowners.

On 2nd March 2016, Matthew Perks, Planning Officer for Wiltshire Council sent us a letter saying that he was 'withdrawing' our planning application for the Sutton Veny Rural Exception Site for affordable housing, which is against policy and procedure. It was out understanding that the 'applicant' only has the right to 'withdraw' their application NOT the Planning Authority. Wiltshire Council's Planning 'Withdrawal' letter has not been added to our application documents on the Wiltshire Councils Planning Portal neither has our objection letters to their decision to withdraw our application, which have never been responded to. Clearly, Wiltshire Council does not want Rural Exception Sites for Affordable

Housing even if it is in their Wiltshire Core Strategy 2026.

So imagine our surprise to receive an email out of the blue in December 2018 telling us that we have been overlooked due to a 'technical error' for this current consultation.

Despite it being Christmas and New Year 2019, we dutifully ploughed through all these planning documents and yesterday 20th January 2019, we discovered that not only had our land Site No: 3407 been earmarked in maps contained in the WHSAP/01 Plan, but it has been appraised in accordance with TOP01 and TOP02 and had been 'REMOVED' for consideration at Table E.1 STAGE 2b. We had absolutely no knowledge of this.

However, we are where we are. We confirm that we wish our land, SHLAA Site No: 3407 to remain on the SHLAA register but please keep us updated. We welcome the opportunity to provide affordable housing for the community of Sutton Veny.

Thank you for reading our consultation submission, if you have managed to read this far, we appreciate your time as it's a lot to wade through.

FOR INFORMATION, BELOW IS AN EXTRACT FROM OUR MARCH 2015 CONSULTATION SUBMISSION:

Please note: The information below collated ALL of the Housing Needs Surveys in Large and Small villages in the Warminster Community Area as at March 2015. This community-led identified Housing Need has not been provided for in the proposed WHSAP/01, only site provision for 32 'remainder' market dwellings are being sought. We haven't been able to find a complete breakdown of all the Warminster Community Area Housing Needs Surveys in the WHSAP/01 as this should have been included in the document as housing need evidence. This is in contravention of SCI 01+02.

Extract: 'TOTAL IDENTIFIED HOUSING NEED (in Warminster Community Area) by applying either:

1. A 'conservative' projection of an estimated 106 units required 2014-2026, multiplied by 3 = 318
  2. The Sutton Veny Housing Need Survey author's projection: An estimated 106 units required 2014- 2026, multiplied by 4 = 424'
- This would be in addition to the 900 dwellings that have been allocated to the west of Warminster town itself.
  - It would not be enough to state that all of these identified households who have been identified through a Housing Needs Survey for a small or large village in the Warminster area will have to accept being 'transferred' to Warminster town strategic allocation site, in order to be housed.
    - There are 8 Small villages and 5 Large villages in the Warminster Community Area – the 5 Large Villages were identified in the Wiltshire Core Strategy 2026 as being part of the Settlement Hierarchy and would be allocated just 49 Indicative Requirement of extra dwellings across the entire plan period. These are Market Housing, not affordable.
    - Given that a minimum of 318-424 affordable dwellings have been identified as being 'required' by Wiltshire Council's own assessments, this is a considerable shortfall.
    - The 5 Large Villages in Warminster Community Area are: Chapmanslade, Codford, Corsely, Heytesbury, Sutton Veny



- ALL of these Large Villages which are located in sustainable locations and which could support a modest number of dwellings to meet identified local housing need, have now been excluded from this 'Draft Informal Consultation on Initial Site Options' contrary to the WCS 2026 Settlement Hierarchy.
- To suggest that this major affordable housing need shortfall in Warminster Community Area will only be allocated 49 dwellings from now until 2026, will be secured via 'windfall sites' that have to be located 'within' the current outdated Settlement Boundary is contrary to the national policy of sustainable development – which is at the heart of the NPPF.

The current out-of-date Settlement Boundaries can only support the odd 1-2 'windfall' dwellings coming forward at a time – this can be proved via analysis of permitted planning applications over the past 30 years (which we have conducted and submitted to you during the Parish Consultations for Sutton Veny); and as sites below 10 dwellings cannot be chased for s106 affordable housing contributions anymore, where are affordable housing sites going to be built WITHIN the outdated Settlement Boundaries in order to meet this identified VILLAGE housing need of 318-424 dwellings for Warminster Community Area?

- It is not acceptable to suggest that no affordable housing will ever be provided for in the Large Villages;
- it is not acceptable to plan for village householders to have to be relocated to Warminster only;
- it will not be acceptable to 'hope' that windfall exception sites for 100% affordable housing will be coming forward in their droves to make 'an exception to policy' to enable affordable housing to be built OUTSIDE the outdated Settlement Boundaries. If this is the hope then Wiltshire Council is not providing good governance and preparedness for the accumulation of households who are in need of affordable housing in the localities that they have a local connection with.
- Wiltshire Council have systematically failed to deliver the affordable housing provision over the past 10 years, this was noted by the Examining Inspector in his final summing up.

The Inspector's observation is borne out in Sutton Veny, where 2 Housing Needs Surveys were conducted: 1 in 2005 – no affordable houses were ever built to-date, despite Wiltshire Council's Housing Survey author recommending that 5 affordable dwellings needed to be built between 2005-2008; the 2nd Housing Needs survey has just been completed in Dec 2014, but only 4 Social housing is recommended – a downgrading despite resident's responses requiring more, and 72% of residents in support of new housing in the village (in stark contrast to the Parish Council's lack of support), an additional 12 households currently on the housing register for Sutton Veny was also not taken into account. A minimum total of 17 dwellings are now required in Sutton Veny, with no site allocated to provide for this primary sourced, identified housing need.

A small site in Sutton Veny, which is sustainably located in accordance with the NPPF and the WCS 2026, is available, achievable with a high level of deliverability, is currently going through planning as a rare 'exception site for affordable housing' but this application has taken over 18 months to assess in planning – longer than most large scale development sites. The site was also submitted following the Calls for Sites exercise but because it can only provide up to 5 dwellings it has been removed by the 'Draft methodology' because it is below the 50+ dwelling threshold. It has not been assessed in accordance with the Calls for Sites Proforma Terms and Conditions.

	<p>Therefore if Wiltshire is expecting that windfall sites will come forward to provide 100% Affordable Housing in perpetuity, but take over 18mths to process 'exception site' applications, landowners will have to assess if it is worth all the time and effort before submitting a site as an exception in order to provide locally needed homes.</p> <p>Hence the need for a 'flexible development plan' that will respond to 'identified housing need' in 'all' locations - whether Principal Towns, Market Towns, Local Service Centre or Large and even Small Villages by identifying 'sustainable, available potentially achievable and deliverable' development sites, large or small, within each locality where housing is required. This will enable a strong robust development strategy that is backed up by primary sourced evidence informed by local communities.</p> <p>At the moment it appears that this exercise of consultation is trying to justify changing the newly adopted WCS 2026 in order to just about satisfy the Inspector's requirements of increasing land supply evidence and seeming to undertake 'settlement boundary' revision to demonstrate enough allocation of space; whilst trying to minimise any actual change to the restrictive outdated Settlement Boundaries which will never enable a 'flexible planned response to identified and emerging housing need until 2026'.</p> <p>(please see attachment for plan)</p>		
<p><b>SA docs or HRA doc - Please state which of the following matters 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>Which evidence document - Please state which of the following matters 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>5258457</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>No, the Proposed Change does not meet a previous objection</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

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).