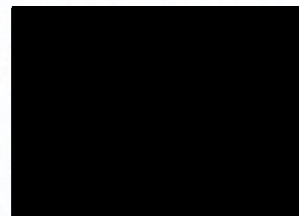


14 February 2019



Mr Ian Kemp  
Wiltshire HSAP Programme Officer  
16 Cross Furlong  
Wychbold  
Droitwich Spa  
Worcester  
WR9 7TA

Dear Mr Kemp

**Respondent Reference No. 1187835**  
**Statement - Wiltshire Housing Site Allocations Plan Examination - Settlement Boundary - Proposed Change SBR PC42**

Thank you for your email dated 8 February. I should like to take up the opportunity of making additional representations and to attend the Settlement Boundary hearing (Matter 4) on 11 April 2019.

***Additional Representations***

These additional representations arise under Matter 4, General Questions 6.3 and 6.4 respectively:

- Has the review of settlement boundaries been carried out in a consistent manner across the plan area?
- For specific settlements, are there any factors which indicate the settlement boundary is not justified or effective?

My representation of 7 November 2018 sought to demonstrate that the two representations (Comment IDs 143 and 375 refer) by West Tisbury Parish Council (WTPC) for a change to the Tisbury Urban Settlement Boundary determined by Wiltshire Council's Officers in June 2017 (marked red on plan SBR PC42) were unsound because they were not consistent with the review methodology and had not been the subject of proper consultation with local residents.

Events since submission of my 7 November 2018 representation further support the conclusion that representations Comment IDs 143 and 375 are indeed unsound. If a motivating factor for the proposed change to the Settlement Boundary is that development is sought on a site which falls outside the settlement, this should not be

achieved by circumventing the Settlement Boundary policy, but should more appropriately be the subject of Rural Exception Site policy.

This representation makes reference to “Westgate” which requires explanation. Westgate house is a property which owns a paddock and other lands currently outside of the settlement of Tisbury. In addition to the paddock its lands include a grass ransom strip, also outside the existing settlement, which extends to Monmouth Road. WTPC’s original representations (Comment IDs 143 and 375) sought to bring all of the lands belonging to the owners of Westgate house within the settlement boundary. These lands constitute a considerable part of the area included in the proposed change SBR PC42.

It was only by chance that residents discovered that a focussed consultation was being undertaken at all and that WTPC had requested a change to the June 2017 assessment made by Wiltshire Council’s officers. I was doing some research into community land trusts and I came across it. I then asked immediate neighbours if they were aware of it and they were not.

The existence of the focussed consultation then spread by word of mouth to reach more residents potentially affected by the proposed Settlement Boundary change. Some of these contacted West Tisbury Parish Council (WTPC) to request information. As a result, a number of residents attended WTPC’s meeting on 1 November 2018.

At that meeting a discussion took place lasting at least 20 minutes, with the participation of the residents who had attended, as to what was the most appropriate Settlement Boundary and what would be WTPC’s formal response to the focussed consultation.

In the presence of the residents, the Parish Council agreed that any revision of the Settlement Boundary from West to East leaving Monmouth Road should:

- follow the RED (HSAP pre-submission June 2017) line originally determined by Wiltshire Council’s officers and shown on plan SBRPC42 up to its most Northerly point. This includes the garages and small gardens of 87 to 89 Monmouth Road as originally proposed by Wiltshire Council
- follow the BLUE (WCS January 2015) line from this point Eastwards behind the houses of Mount Pleasant. This excludes the paddock belonging to Westgate and other fields adjacent to the countryside beyond.

The Parish Council agreed in the presence of the residents to request a Settlement Boundary which followed this line as shown in orange on the plan below:



A member of the public present reminded the Parish Council that it would need to write to Wiltshire to indicate that it had revised the representations it had made in 2017 (Comment IDs 143 and 375 refer). A member of the public was present until the end of the meeting and confirms that there was no further discussion on that item.

You will see that the penultimate paragraph of my representation submitted on 7 November 2018 (that is, six days after the Parish Council meeting) outlines what the Parish Council agreed, as reported back to me by the member of the public who attended for the entire meeting.

Yet on 5 January 2019 WTPC wrote to residents saying that it had been given "one last opportunity to make any additional comments" by 22 January 2019. In response I wrote on 11 January 2019 to the Clerk as follows:

"Thank you for your letter of 5 January.

"On 1 November 2018 I understand that the parish council discussed the settlement boundary change, under the item on the focussed consultation on the draft Wiltshire Housing Sites Allocations Plan. The parish council listened to the concerns of residents and undertook to make representations to the Planning Inspector via Wiltshire Council reversing its advocacy for increasing the urban settlement boundary in Tuckingmill (August 2017).

"I believe that the deadline for responding to the focussed consultation was 9 November 2018 for everybody.

"Did the parish council respond to the focussed consultation in the terms it had undertaken to residents on at its meeting on 1 November 2018, by the deadline of 9 November 2018? Why has the parish council "one last opportunity to make any additional comments" by 22 January when the consultation supposedly closed on 9 November 2018?"

I received a reply on 15 January 2019, including an extract of the formal minute of the Parish Council meeting on 1 November 2018, as follows:

*"Draft Housing Site Allocations Plan – Focused consultation to support the examination. Consultation period for response 27<sup>th</sup> Sept to 9<sup>th</sup> November 2018.*

*Following a lengthy discussion and taking into consideration the views expressed in the public open session part of this meeting and various correspondence/emails received. The parish council agreed to write to Spatial Planning, Economic Developments & Planning at Wiltshire Council to inform them of local concern and ask for direct consultation with property/land owners adjoining the proposed area of change, preferably with a site visit. Also, to clarify the status of the various pieces of land and their usage within the revised proposed areas of change. All affected residents were advised to also write to WC direct. Action: Clerk"*

This minute is inexplicable. This is not what was agreed in discussion with residents at the WTPC meeting on 1 November 2018. The minute also implies that there was an open session discussion with the public present and a further discussion after the public had left. This is absolutely not the case. A member of the public was present for the entire meeting; there was no closed session.

It is only at this stage (that is, two and a half months after the event) that there was any awareness that WTPC had not modified its representation to Wiltshire Council according to what had been agreed with residents present on 1 November 2018. To this date no satisfactory explanation for this has been received from the Parish Council.

Wiltshire Council's response to WTPC's November 2018 representation was quite properly to dismiss it, saying:

- Wiltshire Council could not consult with residents direct
- It is the parish council's role to ensure public awareness.

On 16 January 2019, as invited, I submitted yet another representation to WTPC which summarised the substantive points that I had made direct to Wiltshire Council on 7 November 2018.

On 6 February I requested a copy of the WTPC January 2019 response to the extended focussed consultation. The next day I received the following extract from the response, from the Parish Clerk:

*"Please see attached a copy of the November minutes item 55/11/18 h. referring to West Tisbury Parish Council views.*

*"Since this meeting, in light that it is beyond Wiltshire Councils remit to consult direct with residents, the Parish Council have written to every neighbour adjoining the proposed revised area of change. The three residents that contact the Parish Council with concerns previously have once again raised their concerns. We do believe they have also raised their concerns direct to Wiltshire Council.*

*"Perhaps the best solution to resolve the current disquiet would be to retain the June 2017 HSAP Pre Submission, due to current proposed area of change (July 2018) has included privately owned allotment area and a paddock, perhaps erroneously."*

A further development is that residents adjoining the Westgate property (which would be subsumed into the Tisbury urban settlement if the proposed Settlement Boundary change is made) have been informally advised to fence or delineate clearly their property boundary with Westgate if they have not already done so.

Residents now suspect that there is a wish or a proposal to redevelop the Westgate property when it is sold. A change in the Settlement Boundary to include Westgate

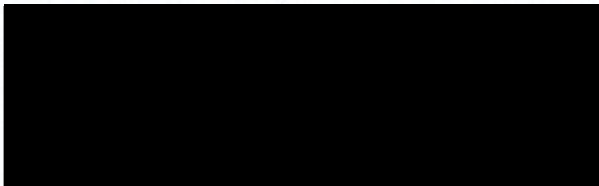
land would clearly be helpful to such an intention. But the correct approach to any such development should be for Wiltshire Council to apply its own policy:

“to exclude the curtilage of a property that relates more closely to the open countryside e.g. a field or a paddock or has the capacity to substantially extend the built form of the settlement in terms of scale and location”.

as properly applied by its officers in the June 2017 consultation.

That policy should not be circumvented in order to achieve development objectives. Rather, if it eventually emerges that there is interest in developing the Westgate land, it should properly be considered with reference to the Wiltshire Council policy for Rural Exception Sites.

Yours sincerely

A large black rectangular redaction box covering the signature area.

Kevin Peters