



Working towards a Core Strategy for Wiltshire

Sustainability Appraisal Report and Habitats Regulations Assessment

Summary of issues raised
through consultation

June 2012

Wiltshire Core Strategy

Sustainability Appraisal Report and Habitats Regulations Assessment

Summary of issues raised through consultation

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Introduction

1. The purpose of Sustainability Appraisal (SA) is to promote the objectives of sustainable development within planning policy. This is done by appraising the social, environmental and economic effects of a plan from the outset and in doing so, helping to ensure that sustainable development is treated in an integrated way in the preparation of the Core Strategy.
2. Sustainability appraisal is a requirement of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (NPPF) states that 'a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.'
3. The Sustainability Appraisal Report that accompanies the Core Strategy incorporates the requirements of the European SEA (Strategic Environmental Assessment) Directive 2001/42/EC for the production of an environmental report that assesses the significant environmental effects of the Core Strategy.
4. European Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive) requires a Habitats Regulations Assessment (HRA) to be undertaken on the Core Strategy. Wiltshire Council appointed WSP Environmental Consultants to undertake the HRA requirements for the Core Strategy and an HRA Report has been published alongside the Core Strategy.

Core Strategy Sustainability Appraisal Report/Habitats Regulations Assessment - what has been done so far?

5. A Sustainability Appraisal Report has been published alongside the Core Strategy at each stage when public consultation has been carried out. The SEA Directive requires that Natural England, Environment Agency, English Heritage and the public are consulted on the report, and those requirements have been complied with.
6. HRA Reports have also been published alongside the Core Strategy at each consultation stage and Natural England has been consulted, as required.
7. All consultation responses regarding the SA and HRA have been taken into account in the sustainability appraisal and HRA.

What does this 'summary of issues raised through consultation' report contain?

8. This report summarises all representations received from 20th February 2012 to 2nd April 2012 that relate to the Wiltshire Core Strategy Sustainability Appraisal Report and HRA Report. It shows the name of the consultee and the changes that are required as a result of the comments.
9. A number of other minor and major amendments have been recognised as necessary to meet legal requirements that did not necessarily come up in the consultations responses. These have been outlined also.

10. All headline issues have been included in a separate table in Appendix A. A brief discussion of these headline issues follows:

Headline issues and changes proposed to Sustainability Appraisal Report – 12 June 2012

- **Wiltshire-wide housing requirement alternatives** - it was considered necessary to assess reasonable alternatives to the Core Strategy requirement for 37,000 new homes. Alternatives considered are a housing range between 35,800-42,100 new homes, 56,800 new homes and 20,900 new homes. The figures 56,800 and 20,900 are the upper and lower housing limits considered in the Core Strategy evidence base. This has been actioned.
- **Wiltshire-wide employment land requirement alternatives** - it was considered necessary to assess reasonable alternatives to the Core Strategy requirement for 178ha of employment land. Alternatives assessed are 36ha and 213ha. The 36ha is based upon figures set out in the council's evidence base document relating to future employment needs in Wiltshire¹. The higher figure of 220 ha is based upon figures set out in the Wiltshire Workspace and Employment Strategy². This has been actioned.
- **Review of sustainability appraisal monitoring indicators** – Natural England have requested a review of the monitoring indicators as they say some are not relevant or appropriate. This is to be actioned.
- **Review of community areas where strategic housing allocations removed** – after publication of *Wiltshire 2026* in October 2009, strategic housing allocations were removed from the Calne, Corsham, Devizes, Malmesbury, Melksham, Wootton Bassett community areas and from West of Swindon. A number of reps have been received questioning why this change in policy was not assessed. A comparison exercise will be completed assessing the previous strategic allocation against the removal of the allocation. This has been actioned.
- **Neighbouring authorities' Core Strategies** – carry out review of the key objectives/issues in these Core Strategies that are considered particularly relevant to Wiltshire to update the information contained within the Sustainability Appraisal Scoping Report. This has been actioned.

Conclusion

11. The proposed changes to the sustainability appraisal summarised above have not led to the need for significant amendments to the Wiltshire Core Strategy. These changes will be included in the final Sustainability Appraisal Report. Appendices A to D identify all proposed changes to improve the clarity of the draft Sustainability Appraisal Report and

¹ Future Employment Needs in Wiltshire – Employment Floorspace and Land Forecasts (Wiltshire Council, April, 2011)

² Wiltshire Workspace and Employment Strategy – Final Draft Strategy Document (DTZ, May 2009)

the Wiltshire Habitats Regulations Assessment. The amended Wiltshire Core Strategy Sustainability Appraisal Report and amended Wiltshire Core Strategy Habitats Regulations Assessment will be submitted to the Secretary of State alongside the Wiltshire Core Strategy.

List of respondents on SA/SEA and HRA

Individuals

Kim Stuckey ID 375804

Organisations

Badminton Estate ID 389544

Bloor Homes ID 556573

Chippenham 2020 ID 549066

CPRE ID 392322

George Mcdonic – CPRE ID 449363

Defence Infrastructure Organisation

English Heritage ID 403792

Environment Agency ID 637160

Hallam Land ID 644496

Hallam Land Management ID 645345

Hannick Homes ID 402192

Mactaggart and Mickel Strategic Land ID 637616

Natural England ID 382216

Network against Wiltshire Sprawl ID 646820

Primegate properties ID 404474

Putney investments

Redcliffe Homes ID 556922

Salisbury Campaign for Better Transport ID 406262

Savernake Parish Council ID 397839

White Horse Alliance ID 487991

Appendix A. Summary of headline issues and sustainability appraisal changes to be made

Comment/Rep/ organisation name	Headline issue summary	Sustainability appraisal changes
<p>ID 637616 SA Rep 2 Mactaggart and Mickel Strategic Land</p>	<ul style="list-style-type: none"> ▪ The SA fails to adequately deal with reasonable alternatives in relation to proposed housing allocations. ▪ There is no justification in the SA for the proportion of overall housing requirements proposed that is regarded as strategic. ▪ There is no assessment of the reasons behind the overall approach to strategic site selection. ▪ The SA does not properly assess the implications of the very limited allocation of strategic sites outside the principal towns in Wiltshire. ▪ No mitigation is identified to deal with the situation where the Core Strategy fails to deliver sufficient housing within the plan period to 2026. 	<p>The SA has carried out further assessment of the decision not to carry forward strategic housing allocations in the Core Strategy for Calne, Corsham, Devizes, Malmesbury, Melksham, Wootton Bassett, West of Swindon. Section 5 of report.</p>
<p>ID 382216 SA Rep 10 Natural England</p>	<p>SA monitoring indicators A number of the proposed monitoring indicators will not be of any use in monitoring the effect of the plan, thus failing the requirement that "Member States shall monitor the significant environmental effects of the implementation of plans and programmes"</p>	<p>Monitoring indicators will be reviewed to reflect these comments. Section 7 of report.</p>
<p>ID 382216 SA Rep 11 Natural England</p>	<p>Monitoring public open space There are no indicators monitoring the provision of Public Open Space.</p>	<p>Monitoring indicators will be reviewed to reflect these comments. Section 7 of report.</p>
<p>ID 644496 Rep 599 Hallam Land</p>	<p>Melksham strategic housing site removed from CS and not assessed in SA.</p>	<p>The SA has carried out further assessment of the decision not to carry forward strategic housing allocations in the Core Strategy for Calne, Corsham, Devizes, Malmesbury, Melksham, Wootton Bassett, West of Swindon. Section 5 of report.</p>
<p>ID 404474 Rep 1741 Primegate properties</p>	<p>The SA fails to consider the implications for the Wiltshire Core Strategy's objectives and spatial strategy of allocating/not allocating (contingency) sites to accommodate growth of Swindon in the event this cannot be fully accommodated within the Borough's boundaries. Without such appraisal of these alternatives and ensuing discussion, the SA does not provide a robust evidence base for the proposed policy decision to make no (contingency) allocation(s) west of Swindon.</p>	<p>Amendments made to section 5.21 of the SA Report to clarify the decision not to allocate strategic sites in the community area. The SA has carried out further assessment of the decision not to carry forward strategic housing allocations in the Core Strategy for Calne, Corsham, Devizes, Malmesbury, Melksham, Wootton Bassett, West of Swindon. Section 5 of report.</p>
<p>ID 402192 Rep 1742 Hannick Homes</p>	<p>The SA fails to consider the implications for the Wiltshire Core Strategy's objectives and spatial strategy of allocating/not allocating (contingency) sites to accommodate growth of Swindon in the event this cannot be fully and accommodated within the Borough's boundaries. Without such appraisal of these alternatives and ensuing discussion, the SA does not provide a robust evidence base for the proposed policy decision to make no (contingency) allocation(s) west of Swindon.</p>	<p>Amendments made to section 5.21 of the SA Report to clarify the decision not to allocate strategic sites in the community area. The SA has carried out further assessment of the decision not to carry forward strategic housing allocations in the Core Strategy for Calne, Corsham, Devizes, Malmesbury, Melksham, Wootton Bassett, West of Swindon.</p>

<p>ID 645345 Rep 923 Hallam Land Management</p>	<p><i>Sustainability Appraisal / Strategic Environmental Assessment</i> The SA/SEA (October 2009) which assessed the sustainability implications of the Wiltshire 2026 Consultation Document supported the inclusion of the strategic allocation at Melksham. In the Summary section it states that "Option 2 [land to the east of Melksham] is clearly much more sustainable than either Options 1 or 3". On the basis that the site was identified through the SA/SEA as being the most sustainable and, as a result of this, was allocated in the Core Strategy, there are clear grounds for the allocation of the site. We are not aware of any assessment in the subsequent SA/SEA of the implications of removing the allocation from the Core Strategy. The removal of the allocation potentially opens up the possibility of development on less sustainable sites and could therefore have sustainability implications which should have been tested through the SA/SEA process.</p>	<p>Section 5 of report. The SA has carried out further assessment of the decision not to carry forward strategic housing allocations in the Core Strategy for Calne, Corsham, Devizes, Malmesbury, Melksham, Wootton Bassett, West of Swindon. Section 5 of report.</p>
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Appendix B. Core Strategy Sustainability Appraisal – Consultation representations and changes required

Org ID/Rep/ organisation name	Comment summary	Wiltshire Council response
ID 637616 SA Rep 2 Mactaggart and Mickel Strategic Land	<p>The SA fails completely to adequately deal with reasonable alternatives in relation to proposed housing allocations. There is no clear indication as to why sites are regarded as strategic or not or why sites previously regarded as strategic have been removed. Specifically in respect of Land at Coate Bridge Devizes there is no explanation as to why this site was not considered individually but apparently assessed in conjunction with other land.</p> <p>There is also no justification in the SA for the proportion of overall housing requirements proposed in the pre submission draft core strategy that is regarded as strategic.</p> <p>There is no assessment of the reasons behind the overall approach to strategic site selection.</p> <p>The SA does not properly assess the implications of the very limited allocation of strategic sites outside the principal towns in Wiltshire.</p> <p>No mitigation is identified to deal with the situation where the Core Strategy fails to deliver sufficient housing within the plan period to 2026.</p> <p>The general "tick box" approach used in the SA is wholly inadequate and appears to be used to justify a pre-determined approach rather than rigorously evaluate the environmental implications of reasonable alternative scenarios and in particular the different options for meeting appropriate levels of housing provision on specific sites.</p>	<p>The SA has considered an adequate number of reasonable alternatives to all strategic allocations. Topic paper 12: Site selection process gives explanation for all strategic and non-strategic site selection.</p> <p>The SA has carried out further assessment of the decision not to carry forward strategic housing allocations in the Core Strategy for Calne, Corsham, Devizes, Malmesbury, Melksham, Wootton Bassett, West of Swindon. Section 5 of report.</p> <p>The SA has assessed reasonable alternatives to overall Wiltshire-wide housing numbers and outlines the sustainability implications of this delivery.</p> <p>The SA has not been carried out as a 'tick box' exercise and has not been used to justify a pre-determined approach.</p>
ID 406262 SA Rep 3 Salisbury Campaign for Better Transport	<p>See ID 406262 Rep 146 above</p>	<p>See ID 406262 Rep 146 for response</p>
ID 397839 SA Rep 5 Savernake Parish Council	<p>Marlborough Strategic Site Selection.</p> <p>It is NOT within Groundwater Source Protection Zone 3 it is in Zone 1. This is the inner protection Zone. The soils are permeable and hence the serious objections from Savernake Parish Council.</p>	<p>No change. The information re Groundwater sources was received from the Environment Agency.</p>
ID 389544 SA Rep 6 Badminton Estate	<p>Strong support is given for the identified benefits that can be expected to arise from the implementation of sustainability objectives, including for rural areas, where there is a particular need to:</p> <ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures. • Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth. • Ensure adequate provision of high-quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce. 	<p>Noted.</p>
ID 382216 SA Rep 9 Natural England	<p>SA Appendix G</p> <p>Natural England has not scrutinised the content of the Sustainability Appraisal in detail, but welcomes Appendix G - Statutory environmental bodies Core Strategy consultation responses - August 2011, wherein it is demonstrated our earlier concerns have been considered.</p>	<p>Noted.</p> <p>Appendix G now contains the most recent consultation comments from Natural England.</p>

Org ID/Rep/ organisation name	Comment summary	Wiltshire Council response
ID 382216 SA Rep 10 Natural England	SA monitoring indicators We note that a number of the proposed monitoring indicators will not be of any use in monitoring the effect of the plan, thus failing the requirement that "Member States shall monitor the significant environmental effects of the implementation of plans and programmes". For example, "% of local authority area designated as AONB" is very unlikely to vary on the basis of the plan. We advise that the proposed indicators are reviewed to include only those likely to change as a result of the plan.	Monitoring indicators will be reviewed to reflect these comments.
ID 382216 SA Rep 11 Natural England	Monitoring public open space We note that there are no indicators monitoring the provision of Public Open Space. An appropriate metric should be developed as part of the Green infrastructure strategy. We also note that there are no indicators monitoring the impact of the plan on landscape. A suitable metric might be "proportion of development in accord with Policy 51".	Monitoring indicators will be reviewed to reflect these comments.
ID 403792 Rep 1548 English Heritage	Archaeological constraints to development Constraints to development at the Rawlings Green, Chippenham site are currently unknown. The comment queries the sites capacity to accommodate 700 new homes when these constraints are yet to be fully investigated. Also that if development occurs within a close proximity to the listed building and the Medieval and Roman settlement remains the development would substantially harm the significance of the heritage assets and would therefore be unsustainable and contrary to the National Planning Policy Framework.	These comments have been reflected in SA for east Chippenham, Rawlings Green. Section 5.12 of report.
ID 403792 Rep 1553 English Heritage	Conservation area identified within strategic site The South West Chippenham Strategic Site includes development allocated within the Rowden Conservation Area, an open rural landscape designated for its historic character and significance.	These comments have been reflected in SA for South West Chippenham Strategic Site. Section 5.12 of report and Appendix H.
ID 403792 Rep 1561 English Heritage	Development affecting Cley Hill The Core Strategy is relatively silent on development affecting Cley Hill Schedule Monument and its setting. Development causing substantial harm to Cley Hill's significance would be contrary to the National Planning Policy Framework and as such the Core Strategy would be unsound.	The SA Report has been amended to reflect these comments. Section 5.33 and Appendix H.
ID 403792 Rep 1566 English Heritage	Archaeological constraints to development The Core Strategy includes only a brief generic reference to instances where sites will affect heritage assets, including their setting, and contain features such as archaeology of significance. This should be revised to reflect national planning policy more fully, particularly paragraphs 169 and 170 of the NPPF. I cite North Chippenham Strategic Site page 242 as an example. "Archaeology and Historical Interest - There are likely to be archaeological constraints to development. Further investigation and appropriate mitigation required."	The SA highlights potential archaeological constraints and the need for further investigation.
NB English Heritage did not make any comments specifically relating to the sustainability appraisal		
ID 637160 Rep 743 Environment Agency	Tidworth Area Strategy CP26 Any development on Brownfield sites should consider risks from historic contamination to ground and surface waters and remove any established risk by carrying out appropriate remediation. Include sewage disposal a potential issue in Core Policy 3 (infrastructure requirements).	The SA Report has been amended to reflect these comments. Section 5.28 and Appendix H.
ID 637160 Rep 757 Environment Agency	Tidworth Area Strategy CP26 No reference to the need to consider foul and surface water disposal and a water cycle study.	These comments have been reflected in SA for Tidworth. Section 5.28 of report and Appendix H.
NB Environment Agency did not make any comments specifically relating to the sustainability appraisal		

Org ID/Rep/ organisation name	Comment summary	Wiltshire Council response
No rep no. known. Putney investments (email from CG 17/4 re Sands Quarry)	The Core Strategy SA includes "Framework Objectives" intended to inform the Core Strategy. Objective No 2 Seeks to ensure the efficient and effective use of land and the use of suitably-located previously-developed land and buildings. This does not carry through to the Core Strategy.	No change. The SA acknowledges the sustainability benefits associated with use of brownfield land.
ID 556922 Rep 1336 Redcliffe Homes (email from CG 25/4 re BoA (land north of Holt Rd))	Redcliffe Homes notes the revisions made to the Sustainability Appraisal in response to representations made during the consultation period June-August 2011. Redcliffe Homes is pleased that Wiltshire Council recognises within the updated Sustainability Appraisal that there are no overriding constraints to development of Land North of Holt Road. They want further re-assessment in light of findings of Historic Landscape Assessment.	Amendments made to para 5.9.20 SA Report and Appendix I.
No rep no. known. Defence Infrastructure Org. (email from AL 28/4)	Officers of the Planning Authority have already accepted that a key to the abbreviations to aid interpretation of the Sustainability Appraisal is missing.	This key has now been added to methodology section of SA Report. Section 2.
ID 644496 Rep 599 Hallam Land	Melksham strategic housing site removed from CS and not assessed in SA. <i>The SA/SEA (October 2009) which assessed the sustainability implications of the Wiltshire 2026 Consultation Document supported the inclusion of the strategic allocation at Melksham. In the Summary section it states that "Option 2 [land to the east of Melksham] is clearly much more sustainable than either Options 1 or 3". On the basis that the site was identified through the SA/SEA as being the most sustainable and, as a result of this, was allocated in the Core Strategy, there are clear grounds for the allocation of the site. We are not aware of any assessment in the subsequent SA/SEA of the implications of removing the allocation from the Core Strategy. The removal of the allocation potentially opens up the possibility of development on less sustainable sites and could therefore have sustainability implications which should have been tested through the SA/SEA process.</i> Inaccuracies in SA of 'land east of Dene', Warminster. <i>The assessment of the site contained within the interim SA/SEA produced by the Council to support the Pre-Submission Core Strategy contains a number of inaccuracies in relation to the 'Land East of the Dene'. Some of the findings within the schedule on page 51 of Appendix I appear to relate to a different site and many of the references are simply incorrect. These inaccuracies were identified in representations to the Consultation Draft Core Strategy in June 2011, however, no changes were subsequently made to the SA/SEA as a result of the representations.</i> <i>It is wholly unacceptable that the errors in the SA/SEA were not identified and rectified prior to the production and subsequent publication of the Pre-Submission Core Strategy. The failure to address these concerns demonstrates that the Council either do not take the matter seriously or do not attach sufficient importance to the findings of the SA/SEA in defining the strategic locations for growth. In either case the net effect is that the SA/SEA is inaccurate and does not provide a sound basis upon which to base the policies and allocations contained within the Core Strategy.</i>	The SA has carried out further assessment of the decision not to carry forward strategic housing allocations in the Core Strategy for Calne, Corsham, Devizes, Malmesbury, Melksham, Wootton Bassett, West of Swindon. Section 5 of report. The removal of the strategic housing site at Melksham is also explained in Topic Paper 12: Site selection process and this is highlighted in the SA. Re 'land east of Dene' site, a review has been carried out and inaccuracies corrected. Section 5.33 of report.
ID 645345 Rep 923 Hallam Land Management	Sustainability Appraisal / Strategic Environmental Assessment The SA/SEA (October 2009) which assessed the sustainability implications of the Wiltshire 2026 Consultation Document supported the inclusion of the strategic allocation at Melksham. In the Summary section it states	The SA has carried out further assessment of the decision not to carry forward strategic housing allocations in the Core Strategy for Calne, Corsham,

Org ID/Rep/ organisation name	Comment summary	Wiltshire Council response
	<p>that "Option 2 [land to the east of Melksham] is clearly much more sustainable than either Options 1 or 3". On the basis that the site was identified through the SA/SEA as being the most sustainable and, as a result of this, was allocated in the Core Strategy, there are clear grounds for the allocation of the site. We are not aware of any assessment in the subsequent SA/SEA of the implications of removing the allocation from the Core Strategy. The removal of the allocation potentially opens up the possibility of development on less sustainable sites and could therefore have sustainability implications which should have been tested through the SA/SEA process.</p>	<p>Devizes, Malmesbury, Melksham, Wootton Bassett, West of Swindon. Section 5 of report.</p>
<p>ID 375804 Rep 762 Kim Stuckey</p>	<p>Re discussion of effects for Chippenham, potential effects on River Marden and valley should be mentioned.</p>	<p>Amendments made to SA Report Section 5.12 and Appendix I to include effects on River Marden.</p>
<p>ID 392322 Rep 1456 CPRE</p>	<p>We consider the Core Strategy is unsound because neither it nor its Sustainability Appraisal considers an adequate range of 'reasonable alternatives', in particular (1) a different overall spatial strategy, based on prioritising high density mixed use redevelopment within town centres, (2) avoiding and obviating major road capacity increases and prioritising socially and environmentally beneficial infrastructure instead; (3) proactive standards for density, prioritisation of brownfield sites, phasing and coordination. The Sustainability Appraisal report, and earlier appraisal reports it refers to, go in to considerable detail about <i>some</i> kinds of alternatives, including which settlements should fall into different categories for development, and choices of individual sites. But there is no discussion of the kinds of reasonable alternatives called for by the chosen Core Strategy's poor performance on the objectives just identified. We outline what these could be in section 7 below.</p>	<p>It is considered that an adequate and appropriate range of 'reasonable alternatives' has been assessed through the SA.</p>
<p>ID 646820 Rep 1740 Network against Wiltshire Sprawl</p>	<p>We consider the Core Strategy is unsound because neither it nor its Sustainability Appraisal considers an adequate range of 'reasonable alternatives', in particular (1) a different overall spatial strategy, based on prioritising high density mixed use redevelopment within town centres, (2) avoiding and obviating major road capacity increases and prioritising socially and environmentally beneficial infrastructure instead; (3) proactive standards for density, prioritisation of brownfield sites, phasing and coordination. The Sustainability Appraisal report, and earlier appraisal reports it refers to, go in to considerable detail about some kinds of alternatives, including which settlements should fall into different categories for development, and choices of individual sites. But there is no discussion of the kinds of reasonable alternatives called for by the chosen Core Strategy's poor performance on the objectives just identified. We outline what these could be in section 7 below.</p>	<p>It is considered that an adequate and appropriate range of 'reasonable alternatives' has been assessed through the SA.</p>
<p>ID 404474 Rep 1741 Primegate properties</p>	<p>The SA lacks rigour because it fails to consider the implications for the Wiltshire Core Strategy's objectives and spatial strategy of allocating/not allocating (contingency) sites to accommodate growth of Swindon in the event this cannot be fully and accommodated within the Borough's boundaries. Without such appraisal of these alternatives and ensuing discussion, the SA does not provide a robust evidence base for the proposed policy decision to make no (contingency) allocation(s) west of Swindon. Secondly, there has been no updating of the SA or the Swindon Small Scale Urban Extensions (SSSUE) Evidence Paper to reflect criticisms that the original site option appraisals contained inconsistencies and did not include a robust deliverability assessment or the now undeliverable status of Pry Farm2 (2,000 dwellings) within the preferred option for development west of Swindon in Wiltshire.</p>	<p>Amendments made to section 5.21 of the SA Report to clarify the decision not to allocate strategic sites in the community area. The SA has carried out further assessment of the decision not to carry forward strategic housing allocations in the Core Strategy for Calne, Corsham, Devizes, Malmesbury, Melksham, Wootton Bassett, West of Swindon. Section 5 of report. The SA that accompanied <i>Wiltshire 2026</i> included an update that took account of consultation</p>

Org ID/Rep/ organisation name	Comment summary	Wiltshire Council response
		responses received by Swindon Borough Council. Since the <i>Wiltshire 2026</i> document there has been no strategic allocation in the Wootton Bassett community area.
ID 402192 Rep 1742 Hannick Homes	<p>The SA lacks rigour because it fails to consider the implications for the Wiltshire Core Strategy's objectives and spatial strategy of allocating/not allocating (contingency) sites to accommodate growth of Swindon in the event this cannot be fully and accommodated within the Borough's boundaries. Without such appraisal of these alternatives and ensuing discussion, the SA does not provide a robust evidence base for the proposed policy decision to make no (contingency) allocation(s) west of Swindon.</p> <p>Secondly, there has been no updating of the SA or the Swindon Small Scale Urban Extensions (SSSUE) Evidence Paper to reflect criticisms that the original site option appraisals contained inconsistencies and did not include a robust deliverability assessment or the now undeliverable status of Pry Farm2 (2,000 dwellings) within the preferred option for development west of Swindon in Wiltshire.</p>	<p>Amendments made to section 5.21 of the SA Report to clarify the decision not to allocate strategic sites in the community area.</p> <p>The SA has carried out further assessment of the decision not to carry forward strategic housing allocations in the Core Strategy for Calne, Corsham, Devizes, Malmesbury, Melksham, Wootton Bassett, West of Swindon. Section 5 of report.</p> <p>The SA that accompanied <i>Wiltshire 2026</i> included an update that took account of consultation responses received by Swindon Borough Council. Since the <i>Wiltshire 2026</i> document there has been no strategic allocation in the Wootton Bassett community area.</p>
ID 549066 Rep 1752 Chippenham 2020	<p>4. Page 55. para 7.1. "The evidence base for the strategic sites analysis was then reviewed and updated.....All sites at Chippenham were subject to a revised SA/SEA appraisal. Table 2 sets out the sustainability appraisal sites summary. Further details are available within the Interim Sustainability Appraisal Report published alongside the Core Strategy consultation document in June 2011."</p> <p>Wiltshire Council has confirmed that this 2011 report contains the most recent comparison of the sustainability aspects of the individual sites that make up the current options. The relevant table is found in Appendix G of the 2011 Report and the Eastern site is here referred to as Option 2 commencing on page 293 and the Southern site is referred to as Option 5 commencing on page 316. (See the plan and accompanying Table in Appendix 3A for an explanation of the different site and options). The relevant piece of this table comparing these two sites is attached in full as Appendix 3C. Extraordinarily the southern and eastern sites score exactly the same across all 17 categories and nearly all the explanatory words, intended as a specific critique of each site option, are identical, despite the fact that the sites are in very different locations and are different distances from the town centre. They also have very different accessibility to all the key community facilities that are a "key requirement of dealing with issues of social exclusion and making a meaningful contribution to the quality of people's lives" (see p 19. para 2.36 in Topic Paper 14: Building Resilient Communities).</p> <p>Appendix 3 contains a report by Sustainability Specialists, Phlorum Ltd. This includes, in Appendix 3D, a complete reassessment of the two competing sites and a summary of the results is included in the table below. By applying a numerical score, instead of the +/- method preferred by the Council, it becomes clear that the East is significantly better than the South in sustainability terms, scoring +3 against -9.</p> <p>We believe that this clearly demonstrates the many flaws in the Sustainability Appraisal. and this renders the Core Strategy unsound. We would refer you to Appendix 3 for the full report which contains important new evidence, as summarised in the table above.</p>	<p>The Chippenham assessment has been reviewed and updated in line with current evidence and knowledge.</p> <p>The SA has been updated by the Final SA Report in February 2012. The Interim SA Report is not the latest assessment.</p> <p>It is considered that the SA has looked at reasonable alternatives for Chippenham and has identified and described the key significant effects of each option.</p> <p>Re scoring - the report by Phlorum that analyses the SA agrees with the methodology and procedures used in the SA. It also quotes PAS guidance warning of using numerical values to determine significance and states that "although quantified reports may help the assessment, much of the assessment will be subjective so giving it a quantified score, or a semi-quantified score, on issues which are subjective can sometimes be less helpful". It also states "it is agreed with WC that if a numbered scoring system was used it would be tempting to add them to a quantifiable overall score which then gives an artificial level of certainty.</p>

Org ID/Rep/ organisation name	Comment summary	Wiltshire Council response
	<p>5. Page 58. para 7.2. "The Sustainability Appraisal ...was unable to recommend one particular site above other options because one site did not stand out above all others in sustainability terms."</p> <p>See 4 above - if it is agreed that the site comparison Sustainability Appraisal report is unsound, then so is this statement.</p> <p>In summary the above 18 excerpts demonstrate two fundamental flaws in the Core Strategy as it relates to site selection in Chippenham: The process of consultation and the manner in which the plan has evolved through an SEA fails to meet precise legislative requirements;</p>	<p>The SA is not flawed on this basis by not using a numerical scoring system.</p> <p>The Phlorum report disagrees with the outcomes of the SA but agrees that SA is often a subjective exercise.</p>
<p>ID 556573 Rep 1698 Bloor Homes</p>	<p>As part of the evidence base to support the Core Strategy the Council has produced a Sustainability Appraisal of the options. The Appraisal states at paragraph 5.12.69 that: "it is considered that there are no absolute constraints to development in sustainability terms for any of the options and at any individual location"</p> <p>But paragraph 5.12.15 states that: "Key issues in Chippenham which need to be resolved before development takes place are traffic (particularly the A4 through the town and the A350) and potential impacts to the River Avon."</p>	<p>Comments valid. It highlights issues that are considered significant but they are not 'absolute constraints'.</p>
<p>ID 406262 Rep 146 Salisbury Campaign for Better Transport</p>	<p>Note: the following comment is based on comment ID 232 submitted at the previous consultation on the Wiltshire Core Strategy in August 2011. The response to that comment does not make reference to the selection of the options considered in the Sustainability Appraisal, and is therefore not considered to be an adequate response to the points raised.</p> <p>The options evaluated in the interim Sustainability Appraisal in relation to Core Policy 66 - Strategic Transport Network - provide an example of the poor quality of the options which have been considered.</p> <p>The details of the options have not been clearly specified in the evidence base provided, however further enquiries have revealed that the 'Option 2' - termed the 'Status Quo' option - being evaluated for this Core Policy contains schemes from the Wiltshire Structure Plan 2016. The schemes included in this option have in many cases already been further evaluated and abandoned.</p> <p>The Sustainability Appraisal is, we are told, supposed to define and consider 'reasonable alternatives' [See S.A. section 2.3]. To take a 'status quo' option which is based on an assemblage of historical and outdated schemes cannot be considered an investigation of a reasonable alternative.</p>	<p>It is considered that the 'status quo' option is a reasonable alternative. SA guidance states that 'no plan' and 'business as usual' options are appropriate.</p>

Appendix C. Core Strategy Habitats Regulations Assessment (HRA) – Consultation representations and changes required

Org ID/Rep/ organisation name	Comment summary	Wiltshire Council response
<p>ID 487991 SA Rep 4 White Horse Alliance</p>	<p>Letter to Spatial Planning of 31 March 2012 and the supporting evidence contained in our Petition No 1103-2011 submitted to the European Parliament in November 2011, concerning apparent breaches of the European Habitats Directive and the SEA directive that would arise from implementation of the council's development plan.</p>	<p>It is considered that the SA does consider all reasonable alternatives and it does take into account the findings of the HRA. Appendix C of the HRA specifically considers the impacts of CP7 and CP29 upon the Bradford on Avon and Bath Bats SAC, as referred to in the letter (31/03/12).</p>
<p>ID 382216 SA Rep 7 Natural England</p>	<p>Habitats Regulations Assessment Natural England understands from Wiltshire Council that the following documents will be finalised prior to the examination of this strategy:</p> <ul style="list-style-type: none"> * The Stone Curlew Mitigation Strategy; * The River Avon Planning Procedure; * The Bath and Bradford on Avon Bats Planning Protocol. <p>Natural England anticipates that these documents will be sufficient to allow conclusions of no likely significant effect to be made with respect to the issues they are intended to address with one caveat. This caveat relates to The Stone Curlew Mitigation Strategy, in which it is proposed that CIL will be used to offset recreational impacts on stone curlew. Natural England remains concerned that it is still unclear as to whether delivering mitigation through CIL complies with the requirements of the Conservation of Habitats and Species Regulations 2010. As the competent authority the Council must satisfy itself that the proposed approach does comply. We therefore urge the council to seek further legal advice on this matter and to liaise accordingly with ourselves and the Department for Communities and Local Government (DCLG). Natural England's views on the soundness of the Core Strategy are contingent on the timeliness of production and the content of these three documents. However, on the assumption that these documents are produced prior to adoption, and the content is sufficient (and the CIL issue above is resolved), we concur with the conclusion of the Habitats Regulations Assessment, other than the following point (see Comment ID 8)</p>	<p>Wiltshire Council has produced drafts of each of these documents and is expected to receive sign off from Natural England prior to submission of the Core Strategy.</p>
<p>ID 382216 SA Rep 8 Natural England</p>	<p>Habitats Regulations Assessment</p> <p>We concur with the conclusion of the Habitats Regulations Assessment, other than the following point:</p> <p>Ashton Park Urban Extension, South East of Trowbridge, has the potential to affect the Bath and Bradford on Avon Bats SAC. Our response to the Wiltshire Core Strategy October 2009 consultation stated; "The allocated sites are in close proximity to an important maternity roost of Bechstein's bats. There is evidence that these are part of the population which uses the Bath and Bradford on Avon Special Area of Conservation (SAC). There is a risk this roost will be adversely affected by increased recreational pressure. Consequently impacts on these bats will need to be considered under Habitats Regulations Assessment regulations." This has not been addressed or even acknowledged by the Habitats Regulations Assessment. We thus disagree with the conclusions of the Habitats Regulations Assessment and advise that the strategy is unsound.</p>	<p>The SA Report has been updated to reflect these comments. Wiltshire Council is in consultation with Natural England and the promoter of this site. This is progressing well and it is anticipated that NE will agree with the findings of the HRA prior to submission.</p>

Org ID/Rep/ organisation name	Comment summary	Wiltshire Council response
ID 449363 Rep 1602 George Mcdonic - CPRE	Core Strategy para 5.19 bullet point 17. The wording of the paragraph and bullet points is not in line with the legal requirement of the Habitats Directive to protect all protected species and habitats; for this reason the DPD is also unsound.	The Habitats Directive requires consideration for European sites (SAC/SPA) however it does not require explicit consideration for all European protected species as it is not possible to fully understand this at a strategic planning level – these species are therefore fully protected under legislations and carefully considered at the planning application stage.
ID 449363 Rep 1611 George Mcdonic - CPRE	Core Strategy para 5.19 bullet point 16. The wording of these bullet points is unsound as it is not in line with the Habitats Directive, Council Directive 92/43/EEC of 21 May 1992, Article 6, which indicates that the requirement is that development must avoid damage to, and not adversely affect, Special Areas of Conservation and the habits, species and processes which maintain their integrity.	It is not necessary to duplicate or replicate the wording of the Directive in policy in order to be legally compliant with it.
ID 556922 Rep 1334 Redcliffe Homes	In order to be compliant with the Habitats Directive and the Conservation of Habitats and Species Regulations 2010, an Appropriate Assessment of the proposed allocation of the Kingston Farm site in Bradford on Avon will need to be undertaken prior to adoption of the Core Strategy.	A strategic level assessment has been undertaken in the submitted HRA. A project level appropriate assessment will be required to support any planning application for the site.
ID 449363 Rep 1603 George Mcdonic - CPRE	Core Strategy para 5.92 bullet point 5. The wording of the paragraph and bullet points is not in line with the legal requirement of the Habitats Directive to protect all protected species and habitats; for this reason the DPD is also unsound.	See response to Rep 1602.
ID 449363 Rep 1612 George Mcdonic - CPRE	Core Strategy para 5.92 bullet point 4. Bullet point is not in line with the Habitats Directive.	See response to Rep 1611.
ID 449363 Rep 1613 George Mcdonic - CPRE	Core Strategy para 5.109 bullet point 7. Bullet point is not in line with the Habitats Directive.	See response to Rep 1611.
ID 449363 Rep 1614 George Mcdonic - CPRE	Core Strategy para 5.126 penultimate bullet point. Bullet point is not in line with the Habitats Directive.	See response to Rep 1611.
ID 449363 Rep 1604 George Mcdonic - CPRE	Core Strategy para 5.137 bullet point 5. The wording of the paragraph and bullet points is not in line with the legal requirement of the Habitats Directive to protect all protected species and habitats; for this reason the DPD is also unsound	See response to Rep 1602.
ID 449363 Rep 1616	Core Strategy para 5.137 bullet point 7. Bullet point is not in line with the Habitats Directive.	See response to Rep 1611.

Org ID/Rep/ organisation name	Comment summary	Wiltshire Council response
George Mcdonic - CPRE		
ID 449363 Rep 1606 George Mcdonic - CPRE	Core Strategy para 5.155 bullet point 8. The wording of the paragraph and bullet points is not in line with the legal requirement of the Habitats Directive to protect all protected species and habitats; for this reason the DPD is also unsound	See response to Rep 1602
ID 449363 Rep 1618 George Mcdonic - CPRE	Core Strategy para 5.155 bullet point 7. Bullet point is not in line with the Habitats Directive.	See response to Rep 1611.
ID 449363 Rep 1607 George Mcdonic - CPRE	Core Strategy para 5.163 bullet point 9. The wording of the paragraph and bullet points is not in line with the legal requirement of the Habitats Directive to protect all protected species and habitats; for this reason the DPD is also unsound	See response to Rep 1602
ID 449363 Rep 1619 George Mcdonic - CPRE	Core Strategy para 5.163 bullet point 9. Bullet point is not in line with the Habitats Directive.	See response to Rep 1611.
ID 449363 Rep 1620 George Mcdonic - CPRE	Core Strategy para 5.171 last bullet point. Bullet point is not in line with the Habitats Directive.	See response to Rep 1611.
ID 449363 Rep 1560 George Mcdonic - CPRE	The last para. of Policy 69 is incorrect in not referring correctly to the legal obligation under the Habitats Directive. See suggested changes.	It is not necessary to repeat or duplicate the wording of the Directive in order to be legally compliant with it.

Appendix D - Minor sustainability appraisal changes required (not resulting from reps)

Amendments required	Section of SA Report	Reason for amendment
1. Insert in Section 1.2 "The National Planning Policy Framework (NPPF) states that 'a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors'. The NPPF explains that the purpose of planning is to help achieve sustainable development and states that ' <i>sustainable</i> means ensuring that better lives for ourselves don't mean worse lives for future generations. <i>Development</i> means growth'.	1.2	To take account of recently published NPPF wording re sustainability appraisal.
2. Insert 'The South Wilts Core Strategy was formally adopted on 7 th February 2012'	1.5	Clarification. The South Wilts Core Strategy has been adopted.
3. Insert 'Within each matrix, there are columns entitled 'T', 'R', 'S' and 'L' which relate to the following: T = Temporary Scale of effects (Short Term, ST (0-5 years); Medium Term, MT (5-10 years); Long Term, LT (10+ years)) R = Reversibility of effects (Reversible, R; Irreversible, I) S = Spatial Scale of effects (Area Specific, A; County Specific, C; Cross Border, B) L = Likelihood of effects (Likely, L; Unlikely, U)'	2.4	To better explain the assessment of significant effects.
4. Insert 'The most recent consultation responses on the Core Strategy relevant to the sustainability appraisal, received from the statutory environmental consultation bodies and the public are presented in Appendix G. It has been shown where comments have been taken into account in the sustainability appraisal, where applicable'.	2.7	To add detail.
5. Carry out review of neighbouring authorities Core Strategies	3.2	To update information contained within the SA Scoping Report
6. Insert 'It is noted that strategic objectives specifically relating to water management, flooding and transport have been removed and these are considered to be key sustainability issues that could be included in the objectives or supporting text'.	5.2	To highlight issues not contained within strategic objectives.
7. Insert 'It is considered important that a discussion of the importance of protecting Wiltshire's water resources and avoiding flood risk is included in this objective. One of the key outcomes refers to 'Protection and improvement of the quality and quantity of Wiltshire's groundwater and surface water features, helping to achieve the objectives of the Water Framework Directive' but this should be mentioned in the supporting text to the objective. Wiltshire contains many areas with environmentally sensitive watercourses and groundwater sensitivity and this should be considered a key issue'.	5.2	To further highlight issues with strategic objectives.
8. Insert 'It is noted that the original set of objectives included objectives specifically relating to water management, flooding and transport and that these are not represented specifically in the objectives now. These are key sustainability issues discussed in this report and it is assumed that these issues are covered by Objective 6, as well as Objectives 4 and 5. However, it could be made more explicit in the wording of the objective'.	5.2	To further highlight issues with strategic objectives.
9. Insert 'The sustainability appraisal reflects the introduction of Local Service Centres which were introduced as an additional tier to the settlement hierarchy in the June 2011 consultation document. This introduction is explained in Topic Paper 3 which accompanies the Core Strategy and is reflected in the consideration of a revised policy option 2 as shown below'.	5.3	To highlight introduction of Local Service Centres within policy.
10. Insert 'Identify a full hierarchy of settlements (including Local Service Centres) and locations where development is not appropriate. A caveat will be added to allow settlements to change their role through other planning documents'	5.3	To amend policy option 2 to reflect introduction of Local Service Centres.
11. Insert 'The recommended policy (option 2)'	Para 5.3.17	To add clarification.

Amendments required	Section of SA Report	Reason for amendment
12. Insert 'Option 2 has been reviewed and amended to reflect the current Core Strategy which retains existing Large Village boundaries but removes all Small Village boundaries'	Para 5.3.19	To clarify amendment to Option 2.
13. Insert 'Retain all Large Village settlement boundaries and remove all Small Village settlement boundaries'.	5.3	Amend option 2 to reflect policy.
<p>14. Insert '5.3.21 Significant benefits are considered likely through Options 2 and 3 with Option 2 considered to be the most sustainable option. Option 3, the removal of all settlement boundaries, is likely to result in significantly more housing but at the expense of other sustainability objectives, namely land & soil, landscapes and transport. This option would be likely to result in inappropriate development as decisions on applications are made on a case by case basis. This may then lead to inappropriate urban sprawl/ribbon development or a series of smaller developments that together could have cumulative effects in settlements that do not have the necessary infrastructure to cope with such development.</p> <p>5.3.22 Evidence suggests that the removal of some settlement boundaries is necessary in some locations to allow suitable, small-scale and appropriate housing and employment development to take place to meet local needs. Identifying land for growth in sustainable locations where a need has been established and adjacent to settlements, particularly in rural areas, will allow new employment opportunities and the viability of existing services and facilities such as schools, shops and pubs to increase.</p> <p>5.3.23 Significant adverse effects are also considered likely through Option 1. The current settlement boundaries are not considered fit for purpose as the boundaries were created through an arbitrary planning process with little community consultation. This has created a shortfall in housing and new employment, especially in the rural areas, through overly restrictive boundaries excluding areas of developable land. Applications that have been approved by the authority and by appeal bear testament to this situation and current boundaries are likely to continue to restrict housing and employment development impacting on the economy, employment and increasing social inclusion, especially in rural areas.</p> <p>What mitigation measures would prevent, reduce or offset the likely significant adverse effects of these policy options?</p> <p>5.3.24 The sustainability appraisal previously advised that settlement boundaries may need to be revised and that removing boundaries should only be considered where there is less pressure for major development, ensuring that significant development does not occur in inappropriate locations. This has helped in the revision of this policy with the removal of settlement boundaries for Small Villages.</p> <p>5.3.25 The removal of boundaries should not lead to inappropriate development that would lead to loss of significant areas of greenfield land or high value agricultural land. Development should also be located where adverse impacts on rural and urban landscapes can be avoided or minimised. Removing settlement boundaries should only be considered where policy strictly controls the type and size of development that can come forward at those locations, and through consultation with the local community. The Core Strategy recognises this and states that 'any development at Small Villages will be carefully managed by Core Policy 2 and the other relevant policies of this plan'.</p> <p>Favourable option(s) in sustainability terms and recommendations</p> <p>5.3.26 Option 2 is considered the most sustainable option and this is taken forward in the Core Strategy. It will allow smaller settlements to expand in an acceptable and appropriate manner to meet local needs, without resulting in significant impacts associated with Options 1 and 3. Option 2 also allows for relaxation of boundaries of Large Villages where identified through a community-led approach. A limited amount of growth in a settlement can promote self-containment, reducing the need to travel and supporting local businesses. It can also provide much needed local employment and provide affordable housing to meet the needs of local families and young people who wish to remain in their community.</p>	5.3	Amended assessment to reflect Option 2 amendment.

Amendments required	Section of SA Report	Reason for amendment
5.3.27 A flexible approach to settlement boundaries through Option 2 is considered likely to produce the most benefits in sustainability terms and if changes to settlement boundaries were to be brought forward through a neighbourhood plan or similar mechanism, this would allow the local community to get involved and allow benefits to be maximised.		
15. Insert assessment of employment land alternative options.	5.4	As described in headline issue 2 at the beginning of this report.
16. Insert assessment of housing requirement alternative options.	5.4	As described in headline issue 1 at the beginning of this report.
17. Insert 'Core policy 2 sets a target for development on previously developed land of 'at least 35%'. The NPPF states 'planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land'. Alternatives to this target have been considered and a summary of the sustainability appraisal findings follows'.	5.4 Ref Previously developed land	To add clarification regarding requirements of NPPF.
18. Insert 'These are the recommended options'.	5.4	To add clarity.
19. Insert 'The justification for taking forward option 2 target of 35% in the Core Strategy is presented in Topic Paper 2 which accompanies the Core Strategy. It recognises that this figure 'is slightly lower than historic rates of PDL delivery but this reflects Wiltshire's rural setting and allows for the change to the definition of windfall in PPS3 to exclude residential gardens, parks and allotments'. One of the reasons given for setting this target is stated as 'Wiltshire is rural in nature and the relatively low target of 35% reflects the fact that a significant proportion of development will need to be on greenfield land'.	5.4	To explain why Core Strategy opted for 35% target PDL.
20. Insert 'Option 3 is carried forward in Core Strategy policy in line with these recommendations'.	5.5	To explain which option carried forward into Core Strategy
21. Insert 'This effectively means that Options 1 and 2 are limited in their scope and unlikely to provide the range of infrastructure that Wiltshire needs'.	5.5	To explain why Options 1 and 2 not as sustainable.
22. Insert 'Option 1 is marginally the most sustainable option and has been carried forward in Core Strategy policy in line with these recommendations'.	5.9	To further highlight the recommended option.
23. Insert 'The council's 'Historic Landscape Assessment' (January 2012) refers to high likelihood of unknown archaeology at the Kingston Farm site and appropriate archaeological assessment must be undertaken. However, the effects highlighted are not considered significant in relation to the level of growth proposed for either site because mitigation measures (as described in Appendix I) are possible and achievable'.	5.9	To take account of findings of the Historic Landscape Assessment re Kingston Farm.
24. Insert 'In light of the findings of the appraisal of both sites, the sustainability appraisal cannot make a clear recommendation. There are sustainability benefits and concerns with both sites and no site stands out clearly in sustainability terms'.	5.9	To clarify recommendation comparing both sites at Bradford on Avon.
25. Insert 'and Option has been carried forward in Core Strategy policy in line with these recommendations'.	5.10, 5.11, 5.12, 5.13, 5.14, 5.15, 5.16, 5.17, 5.18, 5.20, 5.21, 5.28, 5.30, 5.31, 5.33, 5.34,	To clarify that recommended option taken forward in Core Strategy.

Amendments required	Section of SA Report	Reason for amendment
	5.38,	
Carry out assessment of decision to not allocate strategic housing sites in the Calne Community Area.	5.10	To ensure significant change in policy is assessed.
Insert 'English Heritage have pointed to the Historic Landscape Assessment for the Wiltshire Core Strategy ³ (January 2012) and the potential for archaeological constraints to development at Rawlings Green and that development should be located and designed appropriately to avoid impacts on the listed building and Medieval and Roman settlement remains. Again, it is considered that mitigation is possible to avoid any impacts through appropriate archaeological assessment, design and location of development.'	5.12	Take account of English Heritage comments.
Carry out assessment of decision to not allocate strategic housing sites in the Corsham Community Area.	5.13	To ensure significant change in policy is assessed.
Carry out assessment of decision to not allocate strategic housing sites in the Devizes Community Area.	5.14	To ensure significant change in policy is assessed.
Carry out assessment of decision to not allocate strategic housing sites in the Malmesbury Community Area.	5.15	To ensure significant change in policy is assessed.
Carry out assessment of decision to not allocate strategic housing sites in the Melksham Community Area.	5.17	To ensure significant change in policy is assessed.
Carry out assessment of decision to not allocate strategic housing sites in the Royal Wootton Bassett and Cricklade Community Area.	5.21	To ensure significant change in policy is assessed.
Carry out assessment of decision to not allocate strategic housing sites at West of Swindon.	5.21	To ensure significant change in policy is assessed.
26. Insert 'and is recommended to be carried forward in the Core Strategy'.	5.16	To clarify recommendation of Salisbury Rd strategic site.
Insert 'and there were no allocations in previous iterations of the Core Strategy.'	5.20	To clarify no strategic allocations at Pewsey.
27. Insert 'With regards the decision not to allocate strategic development in this community area, the Wiltshire Core Strategy Pre-Submission Document explains that 'a comprehensive assessment of potential development sites around Swindon has been conducted jointly between Wiltshire Council and Swindon Borough Council to identify the most sustainable locations for development. These are outlined in the emerging Swindon Core Strategy. The study outlines which sites have been assessed and concludes that development to the west of Swindon, including within the Royal Wootton Bassett and Cricklade Community Area, is unnecessary and does not represent the most sustainable option for future growth in Swindon. However, there is a permitted site at Moredon Bridge, on the west of Swindon and an explicit allowance of 200 homes has been made for this development within the housing requirement'. The sustainability appraisal report of March 2011 that accompanied the Swindon Core Strategy & Development Management Policies Revised Proposed Submission Document does not make reference to the assessment of these strategic sites to the west of Swindon and the Core Strategy itself also does not make reference to the decision to remove these strategic sites.	5.21	To explain deallocation of strategic sites west of Swindon.
Insert 'There is a specific issue regarding sewage disposal in this community area and this issue will need to be resolved through appropriate future infrastructure provision. Any development on brownfield sites should consider risks from historic contamination to ground and surface waters and remove any established risk by carrying out appropriate remediation.'	5.28	To take account of comments from Environment Agency.

³ Historic Landscape Assessment for the Wiltshire Core Strategy (Land Use Consultants, January 2012)

Amendments required	Section of SA Report	Reason for amendment
<p>28. Insert 'In sustainability terms there is little difference between whether the principle of a district energy/ heat network in Trowbridge is included within the Wiltshire Core Strategy or in a subsequent DPD. Including it in the Core Strategy may be beneficial as it may allow development to come forward earlier'.</p>	5.32	To explain SA recommendation of options.
<p>29. Insert 'Land east of the Dene is a greenfield site. It does not have any biodiversity or landscape designations and is entirely within flood zone 1. There is an adjacent conservation area (Bishopstrow) and a landscape character area to the north east which any development would need to be sensitive of in design and location. The site Land east of the Dene is well related to Kingdown School, however other journeys to the north, west and south of Warminster from this site could increase through town traffic. It is considered that this site is appropriate for development in sustainability terms, taking into account the mitigation measures highlighted.</p> <p>This site, however, is not large enough to meet Warminster's housing need and the proposal is for residential development only with no mixed- uses proposed. This reduces the employment and economic benefits that are associated with the council's preferred strategic option to the west of Warminster'.</p>	5.33	Update assessment of housing site 'Land east of the Dene' at Warminster.
<p>30. Insert 'Core Strategy policy now supports use classes B1, B2 and B8 in principal settlements, market towns and local service centres, and also sets specific criteria for development outside those settlements, taking account of sustainability appraisal recommendations'.</p>	5.36	To clarify policy amendments to core policy 34.
<p>Insert table 'Sustainability appraisal recommendations'</p>	6.2	To show key recommendations of the SA and how these were taken into account in the Core Strategy.

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