

# APPENDIX 4

[Front cover]

Wiltshire Local Development Framework

Wiltshire Community Infrastructure Levy  
Preliminary Draft Charging Schedule Statement of Consultation  
Regulation 15(7) Statement

January 2014

# APPENDIX 4

[Translations page]

# APPENDIX 4

## Table of contents

1. Introduction	.....p.1
2. Background to Preliminary Draft Charging Schedule	.....p.2
3. Consultation methodology	.....p.4
4. Overview of consultation	.....p.5
5. Next steps	.....p.10
<b>Appendix 1: List of respondents</b>	.....p.12

## 1. Introduction

- 1.1 The Wiltshire CIL Charging Schedule, when adopted, will enable the Council to continue pooling contributions from new development across the county to offset a proportion of the costs of delivering local and strategic infrastructure. From April 2015 (or following the implementation of Wiltshire’s CIL), the Council will be severely limited in its ability to use the existing mechanism of pooling contributions i.e. planning obligations (generally referred to as Section 106 agreements). The use of Section 106 agreements will largely be limited to securing site-specific infrastructure and affordable housing.
- 1.2 Between 1 October and 12 November 2012, Wiltshire Council consulted on a Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule. The Council accepted responses from town and parish councils up to 5 December 2012 to enable them to respond fully to the consultation.
- 1.3 The Preliminary Draft Charging Schedule set out the proposed rates of CIL to be charged on different types of development across Wiltshire, as shown in *Table 1.1*. The Council also invited comments on the viability and infrastructure evidence base and an instalments policy for payment of CIL.

Table 1 - CIL rates in £ per sqm

Development type	CIL Charge £/sq m
Residential	£70
Retail (except retail warehouse, supermarkets and similar development)	£0
Retail warehouse, supermarkets and similar development	£175
Student housing and hotels	£70
All other uses	£0

- 1.4 Regulation 15(7) of the Community Infrastructure Levy (CIL) Regulations (2010; as amended 2011) require that “*the charging authority must take into account any representations made to it under this regulations before it publishes a draft of the charging schedule for examination in accordance with section 212 of PA 2008.*”
- 1.5 This document (the Regulation 15(7) statement) provides an overview of the consultation methodology and a summary of the key issues received in response to the consultation.

## 2. Background to Preliminary Draft Charging Schedule

- 2.1 The Wiltshire CIL Charging Schedule has been in preparation since May 2012 once the Core Strategy and its accompanying Infrastructure Delivery Plan was sufficiently advanced. Progress could not be made prior to this because of the requirement to ensure that proposals in relation to CIL are based upon an up-to-date local development plan and an infrastructure planning evidence base.
- 2.2 Three key pieces of evidence are required to develop a CIL charging schedule; an up-to-date local development plan, an infrastructure delivery plan and an economic viability study.
- 2.3 The Council has worked with BNP Paribas to develop the infrastructure evidence base and produce an economic viability report<sup>1</sup>. This work tests the ability of a range of development types throughout Wiltshire to yield contributions towards delivering infrastructure requirements through CIL and has looked at the geographical variations in viability across Wiltshire. Informal discussions have been held with chief officers to inform this work. Proposed levels of CIL have been tested in combination with the Council's other planning requirements, including the provision of affordable housing.
- 2.4 The options considered by the Council are set out in the viability study. Of particular importance to Wiltshire is the consideration around residential development, differential rates and retail development.

### Residential development

- 2.5 For residential developments, the Council had the option of setting different rates in different parts of Wiltshire. However, the areas to which the rates apply are based on an examination of house values within settlements, which are not necessarily adjacent to one another and do not relate to easy recognisable boundaries (e.g. community areas, housing market areas) requiring arbitrary ones to be established.

### Differential rates

- 2.6 Differential rates would optimise the income for infrastructure and are progressive in the sense that the most profitable developments would pay. However, such a system would be more complex to operate potentially off-putting to developers. The greater the complexity, the more likely it is to require greater justification through the evidence.
- 2.7 The option of differential rates was also considered alongside the potential income that would be secured. The evidence developed to date shows that the limited additional income gained from introducing differential rates is outweighed by the complexity of its implementation. Therefore, the best option was felt to be a single, flat rate of CIL.

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<sup>1</sup> The economic viability report prepared by consultants BNP Paribas can be found online at [www.wiltshire.gov.uk/communityinfrastructurelevy](http://www.wiltshire.gov.uk/communityinfrastructurelevy).

## **Retail development**

- 2.8 While the viability study shows that a CIL rate of £70 per sq m could be charged on new retail development in a number of town centres, the same considerations apply in terms of differential rates as for residential development. As such, for the purposes of simplicity a flat rate of £0 per sq m was proposed for new retail development other than 'retail warehouse, supermarkets and similar developments', where £175 per sq m can be justified.
- 2.9 The Council's Cabinet approved the preliminary draft charging schedule for public consultation on 10<sup>th</sup> September 2012. By publishing the preliminary draft charging schedule for an initial stage of consultation for six weeks starting in October, the Council sought to ensure that Wiltshire can adopt a CIL charging schedule prior to the deadline for further restrictions on the use of section 106 agreements. This will enable the Council, within viability constraints, to maximise developer contributions for infrastructure.

### 3. Consultation methodology

3.1 The Council consulted on the preliminary draft charging schedule in the following ways:

- A series of Councillor briefings in early September (*attended by a total of 24 Members*)
- Developers Forum at Trowbridge Civic Centre Thursday 18 October (*total number of external attendees = 24*)
- Town and parish council newsletter
- Elected Wire
- Wiltshire Magazine
- Several local newspapers throughout Wiltshire
- Notification of consultation through Community Area Board Chair announcements
- Direct email/ letter notifications to all town and parish councils, neighbouring authorities, a wide range of national/ local developers, landowners and property agents, infrastructure providers, local businesses and Chambers of Commerce, charities and voluntary organisations and local interest groups
- Hard copies of all consultation documents available from the main Council offices and libraries
- Electronic copies of all consultation documents available from the Council's website and online consultation portal
- Comments accepted by post, email and online, through the Council's consultation portal

3.2 The following consultation material was provided:

- Preliminary Draft Charging Schedule
- Easy Guide to CIL
- Response form
- CIL Background Paper
- Viability Study
- Infrastructure Delivery Plan and Funding Gap Analysis
- Consultation letter

## 4. Overview of consultation

- 4.1 This section sets out an overview of the comments received in response to the consultation on the Wiltshire CIL preliminary draft charging schedule and provides a brief summary of some of the key issues raised.

### Developers Forum

- 4.2 The Council invited a total of 121 local and national developers, property agents and landowners to the CIL Developers Forum, which was held on Thursday 18<sup>th</sup> October 2012 in Trowbridge Civic Centre. The total number of external attendees was 24.
- 4.3 The forum was chaired by Economy and Regeneration Service Director Alistair Cunningham. Consultants BNP Paribas gave a presentation on the viability evidence base and facilitated a discussion about the proposed rates of CIL.
- 4.4 The key suggestions that came out of the forum were as follows:
- Review how the strategic sites have informed the viability study and assess the need for further work in this area
  - Consider different sizes of retail unit (large and small) in setting a CIL rate, i.e. look at retail units, retail warehouses, supermarkets and similar development
  - Look at presenting the proposed CIL rates in the context of use classes
  - Take into account the importance of MOD serviceman accommodation in terms of viability testing
- 4.5 The full minutes from the forum are available online at [www.wiltshire.gov.uk/communityinfrastructurelevy](http://www.wiltshire.gov.uk/communityinfrastructurelevy).

### Nature of respondents

- 4.6 In all, the Council received representations from 89 different individuals or organisations. *Figure 3.1* below shows the breakdown of respondents by type. This shows that the largest groups of respondents were town and parish councils and landowners/ developers etc. A smaller number of representations were received from the general public, advisory bodies, infrastructure providers, interest groups and neighbouring authorities.



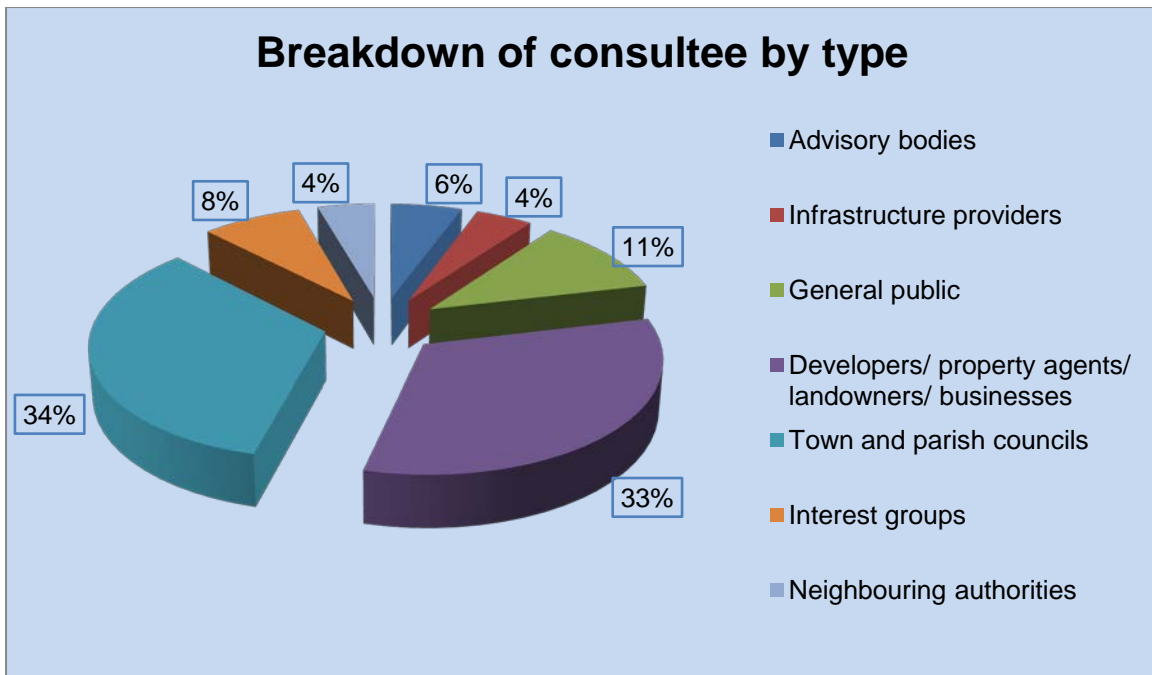


Figure 3.1 – Breakdown of consultees by type

## Key issues

4.7 Some of the key issues raised in the representations are summarised by type of consultee below. The list is not exclusive. All comments are available to view on the Council's online consultation portal at <http://consult.wiltshire.gov.uk/portal>.

### a) Town and parish councils

4.8 The key issues raised by town and parish councils are as follows:

- Loss of benefits from R2 funding for south Wiltshire town and parish councils
- Proportion of CIL to be allocated to the local community and that it should go to town and parish councils, not community area boards
- Differential CIL rates for individual developments
- CIL should be applied to more types of development, e.g. commercial
- More clarity on the how CIL applies to different Use Classes
- Supportive comments for CIL focused on potential community benefits and the preparation of the evidence base by independent consultants
- Objections to CIL focused on perceived adverse impact on development, in particular on small developers

b) Developers, property agents, landowners and businesses

4.9 The key issues raised by developers, property agents, landowners and businesses are as follows:

*Residential*

- Consider exempting care homes (C2) and extra care housing (C3) from CIL
- Consider exempting MOD servicemen accommodation from CIL
- Consider exempting housing for agricultural, forestry and related workers from CIL
- Support for differential rates between high and low value areas and between urban and rural areas

*Retail*

- Clarify definitions of “retail warehouse”, “supermarket” and “similar development”
- Differential rates only allowed for different uses or locations, not by size of development

*Other uses*

- Mixed support for charging CIL on hotels and student housing
- Some support for zero-rated CIL on other uses but, also, concern that they will not be contributing their fair share towards necessary infrastructure

*Instalments policy*

- Strong support for an instalments policy

*Viability study*

- Concern about assumptions in viability study on, for example, abnormal costs, build costs and developer profit
- Concern that study does not assess large, strategic sites or sites of one dwelling
- Concern that study recommends single, flat rate of CIL when evidence shows wide variation in land and sales values across the County
- Concern that the study recommends a level of CIL that makes the 40% affordable housing target (in the Core Strategy) unachievable in some locations
- Concern that the extra cost of achieving Code for Sustainable Homes (CSH) Level 5 is not included in the assessments, despite it being a Core Strategy requirement to achieve CSH Level 6 by 2016
- Concern about density/ site coverage assumptions being too high for larger, strategic urban extensions (50 dwellings per hectare (dph) when 35 considered more realistic)
- Concern about blanket use of affordable rent as a substitute for social rent leading to a higher rate of CIL being considered viable
- Concern that the average sales values are over-inflated by the use of asking prices, rather than sales values, and the lack of representative sales values data from all settlements

### *Infrastructure planning*

- Concern that Infrastructure Funding Gap (IFG) analysis contains infrastructure projects that are unlikely to be funded through CIL and, thus, distorts the IFG, e.g. the electrification of the Great Western Main Line and various Wilts & Berks Canal projects
- Concern that the IFG analysis fails to fully take into account other sources of infrastructure funding, such as Section 106, the New Homes Bonus and Sport England.

### *Spending CIL*

- A draft Regulation 123 list should be published alongside the consultation on a Draft Charging Schedule, setting out what CIL and Section 106 will be spent on
- Concern that CIL receipts might not be used to deliver infrastructure necessary to unlock large, strategic sites that have made the financial contribution

### *Other issues*

- Concern that the preparation of the charging schedule is not compliant with the NPPF
- Suggestion that the charging schedule should only be progressed after formal adoption of the Core Strategy when there will be more certainty over future housing and infrastructure delivery
- Support for a review of CIL in relation to affordable housing policies in the Core Strategy, given the evidence in the viability study
- Support for an exceptional circumstances policy
- Concern about transparency and justification about the up to 5% of CIL to be spent on administration costs
- Support for further viability work in assessing strategic sites in the Core Strategy
- Consideration of differential CIL rates for strategic sites/ regeneration zones

### c) Advisory bodies and infrastructure providers

4.10 The key issues raised by advisory bodies and infrastructure providers are as follows:

- Concern CIL will not provide sufficient mitigation for further development in AONBs
- Green infrastructure should be given greater priority when spending CIL
- Spend CIL on surface water flooding prevention schemes
- Consider impact of development on rail infrastructure

### d) General public

4.11 The key issues raised by the general public are as follows:

- Adverse impact on single, self-build houses
- Increase house prices, especially for first-time buyers

- Incentive for developers to build smaller and substandard houses
- Support for differential rates of CIL

e) Interest groups

4.12 The key issues raised by local and national interest groups are as follows:

- Concern that CIL will not contribute sufficient funds towards mitigating traffic impacts
- Presentation of the Infrastructure Delivery Plan makes it difficult to get an overall picture of transport requirements across the County
- Lack of costs or funding sources for transport projects in south Wiltshire
- Inappropriate infrastructure projects used to establish the IFG, e.g. electrification of the Great Western Main Line and various Wilts & Berks Canal projects
- More detail on infrastructure costs and delivery
- Higher priority for green infrastructure and biodiversity projects

f) Neighbouring authorities

4.13 The key issues raised by neighbouring authorities are as follows:

- More clarity over definition of “retail warehouses”, “supermarkets” and “similar development”
- Charging £0 per sqm CIL on town centre retail is at the cost of potential income and not supported by the viability evidence
- Higher CIL rates should be possible in some areas, according to the viability study
- Concern about whether CIL funds will be paid to neighbouring authorities who provide school places for Wiltshire children
- More clarity on whether financial contributions to mitigate against impacts on the legally protected New Forest sites have been reflected in the preparation of the charging schedule

## 5. Next steps

- 5.1 This report presents a summary of the consultation on the Wiltshire CIL Preliminary Draft Charging Schedule.
- 5.2 The preparation of a Draft Charging Schedule, the next stage in the process of preparing a CIL charging schedule, has been delayed by the publication of new Government guidance on preparing a CIL charging schedule and consultation on further reforms to the CIL Regulations. Delay to the public examination of the Wiltshire Core Strategy has also slowed progress towards a Draft Charging Schedule because of the strong interrelationship and need for conformity between the two documents.
- 5.3 On 14 December 2012, the Government published new statutory guidance on the preparation of CIL charging schedules (updated April 2013). The principal implication of the new arrangements for preparing CIL and the key implications for Wiltshire Council are that there is now a requirement for a considerable amount of extra evidence on viability (at a site specific level); and explicit policies relating to implementation. This additional work had to have been completed before the Council can progress to the next stage of the process.
- 5.4 Between April and May 2013, the Government consulted on further reforms to the CIL Regulations. As a result of the responses received, the Government made a number of proposals in its report on the consultation, which was published in October 2013. The proposed key changes relating to the preparation of a CIL charging schedule included extending the deadline for further restrictions on the use of section 106 agreements to April 2015, allowing differential rates to be set by size of development and by numbers of units or dwellings and requiring a draft Regulation 123 list to be available during the rate-setting process. These changes affect all charging authorities who have not yet published a Draft CIL Charging Schedule for consultation. Further proposed changes, including those affecting how CIL is charged, can be found in the Government's report on the consultation.
- 5.5 The next step in the preparation of the CIL Charging Schedule is for the Council to publish and consult upon a Draft Charging Schedule, taking into account responses received during the Preliminary Draft Charging Schedule consultation. The Council has also undertaken additional work that is required as a result of changes to Government guidance and CIL Regulations in order to achieve what it considers to be a sound Draft Charging Schedule. Following this second stage of consultation, the Council can submit the Draft Charging Schedule for examination by an independent examiner. Receipt of a satisfactory report from the examiner leaves the Council in a position to adopt the charging schedule.
- 5.6 The Council will also need to establish the mechanisms and policies for collecting and administering the Community Infrastructure Levy. This will involve cross-service working between a number of Council departments, including planning, finance, legal and administration. Discussions have already started towards this end and officers will shortly be setting up a cross-service CIL Implementation Group to ensure the Council is ready to implement CIL at the earliest possible opportunity following adoption of the charging schedule.

## **Timeline**

5.7 The next milestones in the preparation of a CIL Charging Schedule for Wiltshire are set out below.

- Consultation on a Draft Charging Schedule – January to February 2014
- Submission to an independent examiner – March 2014
- Public examination – April to June 2014
- Adoption – July 2014
- Implementation – TBC

## Appendix 1: List of respondents

All comments are available to view on the Council's online consultation portal at <http://consult.wiltshire.gov.uk/portal>. These are searchable by Consultee ID and Comment ID, which are given below for each respondent.

#	Respondent	Comment ID(s)
1	Mr John Coleman Oriel Homes (Consultee ID: 689343)	1, 36
2	Mrs Carly Lovell Tidworth Town Council (Consultee ID: 407444)	2
3	Mrs M.S. Carey Box Parish Council (Consultee ID: 401788)	3
4	Mr Michael Chandler (Consultee ID: 699854)	4
5	Mr Charles Routh Natural England (Consultee ID: 382216)	5
6	Ms Diane Holmes Bradford on Avon Town Council (Consultee ID: 397892)	6
7	Mr Derek Webb (Consultee ID: 700073)	7
8	Mr Julian Over (Consultee ID: 463162)	8
9	Ms S Jedrei (Consultee ID: 391826)	9
10	Mr Nigel Lilley Nigel Lilley Architectural Consultant (Consultee: 449131)	10
11	Mr Andrew Lord North Wessex Downs AONB (Consultee ID: 472647)	11
12	Mrs Caroline Walsh West Berkshire District Council (Consultee ID: 707327)	12
13	Mr Tony Pooley Little Somerford Parish Council (Consultee ID: 707355)	13

#	Respondent	Comment ID(s)
14	WM Morrison Supermarkets Plc (Consultee ID: 449445) c/o Mr Peter Keenan Peter Brett Associates (Consultee ID: 556221)  c/o Mrs Lorraine Kelly Peacock and Smith (Consultee ID: 708558)	14, 20
15	Mrs Margaret Willmot Salisbury Campaign For Better Transport (Consultee ID: 406262)	15
16	Mr David Wildman Glebe Developments Wessex Ltd (Consultee ID: 708353)	16
17	Ms Carmelle Bell Thames Water Utilities Ltd (Consultee ID: 401427)	17
18	Lafarge Cement UK (Consultee ID: 708477) c/o Mrs Gail Revill David Lock Associates (Consultee ID: 708443)	18
19	Mr Adrian Duffield Vale of White Horse District Council (Consultee ID: 708550)	19
20	Phil Hardwick Robert Hitchens Ltd (Consultee ID: 397085)	21
21	Mr Peter Baxter Devizes Community Area Partnership (Consultee ID: 708645)	22
22	Mrs Helen McGrath Gladman Developments (Consultee ID: 704690)	23
23	Society of Merchant Venturers (Consultee ID: 397800) c/o Mr Ian Gillespie Carter Jonas LLP (Consultee ID: 706241)	24
24	Mrs Gill Smith Dorset County Council (Consultee ID: 634998)	25



#	Respondent	Comment ID(s)
25	Ms Barbara Morgan Network Rail (Consultee ID: 488946)	26
26	Mr Ian Cunningham (Consultee ID: 364072)	27
27	Ms C Sealy County Landowners Association (Consultee ID: 390389)	28
28	Mr G.E. Purdue Sedgehill & Semley Parish Council (Consultee ID: 708992)	29
29	Mr Richardson Gleeson Homes Southern (Consultee ID: 392818)	30
30	Mrs Katherine Bachler (Consultee ID: 474138)	31
31	Mr Nick King Hills UK Ltd (Consultee ID: 556183)	32
32	Ms Jacqueline Lindre The Orders of St John Care Trust (Consultee ID: 709160)  The Orders of St John Care Trust (Consultee ID: 711399)	33, 74
33	MacTaggart & Mickel (Consultee ID: 556438) c/o Mr Anthony Aitken Colliers International (Consultee ID: 556437)	34
34	Central Chippenham Partnership (CCP) (Consultee ID: 709241) c/o Ms Jo Davies GVA Ltd	35
35	Mr Thomas Minter Malaby Holdings (Consultee ID: 549294)	37
36	Ms Judy Lane North Bradley Parish Council (Consultee ID: 647237)	38
37	Mr Stephen Davis Wiltshire Wildlife Trust (Consultee ID: 644628)	39

#	Respondent	Comment ID(s)
38	Ms Helen Patton New Forest National Park Authority (Consultee ID: 382305)	40
39	Mrs Suzy Birdseye Hallam Land Management (Consultee ID: 335813)	41
40	Mr Mark Limbrick Defence Infrastructure Organisation (Consultee ID: 709143)	42
41	Bloor Homes (Consultee ID: 397750) c/o Mr Lawrence Turner Barton Willmore (Consultee ID: 710031)	43
42	South West Harp Planning Consortium (Consultee ID: 710073) c/o Mr Jamie Sullivan Tetlow King Planning (Consultee ID: 397154)	44
43	Mr Tim Gent Savills (Consultee ID: 710146)	45
44	Mr Jonathan Petty Bedfordshire Pilgrims Housing Association (Consultee ID: 710145)	46
45	Bourne Leisure Ltd (Consultee ID: 397796) c/o Ms Samantha Sainsbury Nathaniel Litchfield and Partners (Consultee ID: 710159)	47
46	Oxford University Endowment Management (Consultee ID: 642979) c/o Mr Roger Smith Savills (Consultee ID: 224831)	48
47	Ms Jenny Raggett Campaign for Better Transport (Consultee ID: 466498)	49
48	Clients of Emery Planning Partnership Ltd (Consultee ID: 710196) c/o Mr Stephen Harris Emery Planning Partnership Ltd (Consultee ID: 389561)	50

#	Respondent	Comment ID(s)
49	Sainsbury's Supermarkets Ltd (Consultee ID: 710226) c/o Mr Lee Jones WYG Planning and Environment (Consultee ID: 710225)	51
50	House Builders Consortium Group (Consultee ID: 710752) c/o Mr Nick Matthews Savills (Consultee ID: 389644)	52
51	Mr Nick Dowdeswell, Ashton Park, Trowbridge (Consultee ID: 398006) c/o Mr Mark Fox Pegasus Planning Group (Consultee ID: 382794)	53
52	Stanhope Plc (Consultee ID: 711346) c/o Mr Craig O'Brien Savills (Consultee ID: 646405)	54
53	Ms Gaye Fairfield Highways Agency (Consultee ID: 704933)	73
54	Mrs Melissa Atyeo Sutton Veny Parish Council (Consultee ID: 398546)	75
55	Mr Graham Stow Stow Associates Ltd (Consultee ID: 709542)	76
56	Mr Lance Allen Trowbridge Town Council (Consultee ID: 391073)	77
57	Mr Tony Peacock (Consultee ID: 391827)	78
58	Mr Duncan Hames MP (Consultee ID: 480631)	79
59	Mr Graham Ewer Swallowcliffe Parish Council (Consultee ID: 390060)	80
60	Mrs Julia Nethercott (Consultee ID: 549920)	81

#	Respondent	Comment ID(s)
61	Mr Steve Gray Melksham Town Council (Consultee ID: 549123)	82
62	Mrs J G Lenton Minety Parish Council (Consultee ID: 398114)	83
63	Ms Claire Rudge Rushall Parish Council (Consultee ID: 712503)	84
64	Mr Simon Fisher Devizes Town Council (Consultee ID: 550257)	85
65	Ms Lucy Thomas NFU South West (Consultee ID: 706975)	86
66	Mr Roger Coleman Southwick Parish Council (Consultee ID: 712546)	87
67	Mr Roger Coleman Dilton Marsh Parish Council (Consultee ID: 391586)	88
68	Mr Roger Coleman Semington Parish Council (Consultee ID: 647394)	89
69	Mr David Pring Environment Agency (Consultee ID: 637160)	90
70	Ms J Feilding Bradford on Avon Preservation Trust (Consultee ID: 390671)	91
71	Mrs J Kirkby Heytesbury, Imber and Knook Parish Council (Consultee ID: 390856)	92
72	Ms Clare Harris Calne Town Council (Consultee ID: 714360)	93
73	Mrs Sandra Harry Donhead St Andrew Parish Council (Consultee ID: 558202)	94
74	Mrs Sandra Harry Tisbury Parish Council (Consultee ID: 391632)	95

#	Respondent	Comment ID(s)
75	Dr Kate Fielden (Consultee ID: 714705)	96
76	Carol Hackett West Ashton Parish Council (Consultee ID: 389494)	97
77	John Blake CPRE Wiltshire (Consultee ID: 401432)	98
78	Scott Taylor Wiltshire Fire and Rescue (Consultee ID: 632170)	99
79	Mr Roger Coleman Westwood Parish Council (Consultee ID: 391585)	100
80	Keith Harvey Westbury Town Council (Consultee ID: 389714)	101
81	Mrs Karen Clay Aldbourn Parish Council (Consultee ID: 390198)	102
82	Lindsey Wood Mere Parish Council (Consultee ID: 391105)	103
83	Lindsey Wood Kilmington Parish Council (Consultee ID: 468232)	104
84	Lindsey Wood West Knoyle Parish Council (Consultee ID: 392667)	105
85	Ron Champion Laverstock & Ford Parish Council (Consultee ID: 715555)	106
86	Richard Burden Cranborne Chase and West Wiltshire Downs AONB (Consultee ID: 556113)	107
87	Rohan Torkildsen English Heritage (Consultee ID: 403792)	108
88	Stephen Hepworth Alton Parish Council (Consultee ID: 392763)	109
89	Louis Hoareau Codford Parish Council (Consultee ID: 398430)	110