



The Planning Inspectorate

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# Report to Wiltshire Council

by **Andrew J Seaman BA (Hons) MA MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 1<sup>st</sup> December 2014

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE  
WILTSHIRE CORE STRATEGY**

Document submitted for examination on 10<sup>th</sup> July 2012

Examination hearings held between 7<sup>th</sup> May and 18<sup>th</sup> July 2013; 30<sup>th</sup> Sept 2014

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# Index

3	Non-Technical Summary
4	Introduction
5	Assessment of Duty to Cooperate
6	Matter 1 – Procedural Matters, Legal Compliance and Vision
10	Matter 2 – Settlement Hierarchy and Delivery (Policies CP1 & 2)
14	Matter 3 – Economy (Policies CP2 & CP34 – 40)
17	Matter 4 – Housing (Policies CP2 & CP43 – 47)
31	Matter 5 – Resilient Communities (Policies CP2, CP48 & 49)
32	Matter 6 – Climate Change (Policies CP41 & 42)
35	Matter 7 – Natural Environment (Policies CP50 – 56) and Water Resources (Matter 10 - Core Policies 67 and 68)
41	Matter 8 – Built Environment (Policies CP57 – 59)
42	Matter 9 – Community Areas:
42	Amesbury
44	Bradford on Avon
47	Chippenham
54	Corsham
56	Calne
57	Devizes
59	Malmesbury
61	Marlborough
65	Melksham
67	Mere
68	Salisbury
70	Pewsey
72	Royal Wootton Bassett and Cricklade
75	Southern
76	Tidworth
77	Tisbury
79	Trowbridge
83	Warminster
85	Westbury
90	Wilton
91	Matter 10 – Infrastructure, Monitoring and Delivery (Whole Document, IDP, CP3 and CP60 – 69)
96	Assessment of Legal Compliance
96	Conclusion
98	Appendix – Main Modifications

## Main Abbreviations Used in this Report

AA	Appropriate Assessment
AHVA	Affordable Housing Viability Assessment
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
CIL	Community Infrastructure Levy
CS	Core Strategy
Framework	National Planning Policy Framework
GTAA	Gypsy and Travellers Needs Assessment
GI	Green Infrastructure
IDP	Infrastructure Delivery Plan
HLS	Housing Land Supply Statement
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LCA	Landscape Character Assessment
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
LP	Local Plan
MM	Main Modification
PPG	Planning Practice Guidance
PPTS	Planning Policy for Travellers Sites
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SAC	Special Area of Conservation
SPA	Special Protection Area

## Non-Technical Summary

This report concludes that Wiltshire Core Strategy provides an appropriate basis for the planning of the county over the plan period providing a number of modifications are made to the Plan. Such modifications have arisen over the course of the Examination and are provided in the Appendix at the end of this report. The majority have been proposed by the Council who specifically requested that I recommend any modifications necessary to enable them to adopt the Plan.

The modifications cover a wide range of matters and include:

- An increase in the minimum number of houses to be provided over the plan period, from 37,000 to at least 42,000 and revisions to their distribution;
- A commitment to partially review the Core Strategy to enable an adequate development plan basis for decision making over the plan period to 2026;
- A commitment to produce additional Development Plan Documents to ensure the effective delivery of necessary development. Such documents will include a Housing Sites Allocation DPD, a Gypsy and Traveller DPD based upon updated needs evidence and a Chippenham Site Allocation DPD;
- The creation of two different affordable housing targets across the county to reflect development viability;
- Clarification of the approach to be taken towards renewable energy to be consistent with national policy;
- Clarity of the approach to be taken towards natural and heritage assets to be effective and consistent with national policy.

## Introduction

1. This report contains my assessment of the Wiltshire Core Strategy (CS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (the Framework, paragraph 182) makes clear that to be sound a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the Wiltshire Core Strategy Pre-Submission Document (February 2012) published for consultation in February 2012.
3. Within the submission documentation, the Council identified a number of changes to be made to the Plan arising from the consultation<sup>1</sup>. Subsequently, further focussed consultation was undertaken to incorporate the schedules of proposed changes (including that affecting Core Policy 42), the publication of the Framework and the Planning Policy for Traveller's Sites, changes made to the Sustainability Appraisal (SA) report and to clarify that the previous consultation had been an opportunity to comment upon the Pre Submission document as a whole. I have had regard to the consultation outcomes.
4. Subsequent to the Hearings of 2013, post hearing consultation and correspondence, the Council produced additional evidence<sup>2</sup> and proposed further modifications to the submitted plan, this included updates to the SA and Habitats Regulation Assessment (HRA). Public consultation<sup>3</sup> upon these matters was undertaken in April and May 2014 in conjunction with an opportunity to comment upon the implications of the publication of the government's Planning Practice Guidance (PPG published March 2014). A further Hearing in relation to matters concerning Matter 4 was held on 30<sup>th</sup> September 2014. I have had regard to the resulting evidence, including all consultation comments, in its totality.
5. This report deals with the main modifications that are needed to make the CS sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the CS unsound/not legally compliant and thus incapable of being adopted. These main modifications, predominantly derived from the Council's own proposals, are set out in the Appendix.
6. The main modifications that go to soundness have been subject to public consultation and, where necessary, SA. I have taken the consultation responses into account in writing this report.

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<sup>1</sup> WCS/02 Appendix 11

<sup>2</sup> EXAM/54, 72, 73, 74, 78 and 84 to 91.

<sup>3</sup> See EXAM/89A, 97A, 98, 99, 101 et al

## Assessment of Duty to Co-operate

7. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
8. The Council's Statement on the 'Duty to Cooperate'<sup>4</sup> sets out the principal activities undertaken in the preparation of the CS. It recognises that at the time when the 'Duty' was enacted the CS was at an advanced stage of preparation yet also indicates that the work of the Council has sought consistently to build meaningful partnerships with appropriate parties to deliver solutions to common strategic issues. Inevitably, this has necessitated working with a large number of adjacent and nearby local authorities<sup>5</sup> which has provided due consideration of various matters, including those influenced by the proximity of key settlements such as Bath, Bristol and Swindon. These matters are discussed further below. I am mindful of the Statements of Common Ground<sup>6</sup> which have been produced illustrating the nature of such work. Similarly, the Council has worked with other prescribed bodies, including Natural England, English Heritage, the Highways Agency and the Environment Agency, to ensure suitable dialogue and actions upon relevant areas of interest. The balance of evidence indicates that such partnership work is set to continue into the foreseeable future.
9. Indeed, the evidence must be considered in its totality. With due regard to SOCG/31<sup>7</sup>, the Council's actions are the product of the internal working relationships and processes between elected Members and Officers. As such, Officers of the Council maintain the position that Section 33A has been discharged in its entirety and that the Council Members had been informed that 'steps taken to prepare the draft Core Strategy are considered to be compliant with legislative requirements'. Whilst the Council has detailed its working arrangements with prescribed bodies there is no single evidence source which baldly indicates how Section 33a)(6)(a) and (b) have been discharged. Nevertheless, there is considerable information indicating the nature of engagement between neighbouring authorities. This includes the Borough of Swindon, whereby Appendix 3 of DEM/40<sup>8</sup> indicated the relative stages of plan preparation between the two authorities and the scope for joint working if necessary upon a joint site allocations plan. I appreciate that progress upon the plans of both Council's has been made and inevitably the effectiveness of any cooperation will need to reflect any changes in circumstance over time. Whilst there is invariably scope for greater detail to be provided in the way in which legal requirements are discharged and the need for constant review of on-going processes, overall, such evidence is indicative that S33A has been addressed adequately.
10. Notwithstanding the effectiveness of such cooperation which is discussed in greater detail elsewhere in this report, the evidence indicates that the Council

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<sup>4</sup> WCS/07 (including EXAM/16)

<sup>5</sup> WCS/07 Section 3

<sup>6</sup> See Section 22 of Document Library List

<sup>7</sup> Statement of Common Ground with RPS re Duty to Cooperate

<sup>8</sup> Wiltshire Council – Submission of Wiltshire Core Strategy and Review of Local Development Scheme

has engaged constructively, actively and on an ongoing basis with necessary prescribed bodies so as to discharge the duty referenced in Section 33A.

## Assessment of Soundness

### Preamble

11. A series of public hearing sessions was programmed to commence in May 2013. Each session was led by an agenda that followed the previous identification of a number of 'Matters and Issues' which I wished to examine further. Each agenda enabled opportunity for submissions to be made as appropriate and also included 'Other Matters' which represented an opportunity to raise additional relevant matters for discussion at each session. Through this methodology a fair and transparent opportunity was provided for all interested parties to raise matters of relevance and concern.
12. The Plan was prepared whilst the Regional Spatial Strategy<sup>9</sup> (RSS) for the South West remained extant and whilst the replacement draft RSS was in production. The subsequent revocation of the RSS was completed whilst the Hearings were in session. An opportunity for all interested parties to comment upon any potential implications arising from the revocation was provided and I have taken into account both the comments received and the revocation itself.
13. Where references are made within this report to the 'county' of Wiltshire these are not intended to include the Borough of Swindon.

### Main Matters

14. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified ten main matters upon which the soundness of the Plan depends. These are addressed, primarily, in turn.

### Matter 1 – Procedural Matters, Legal Compliance and Vision

#### ***Does the Core Strategy have a robust vision for Wiltshire and has it been positively prepared in compliance with all relevant legal requirements?***

15. The CS has been in preparation for some years and there is an extensive evidence base<sup>10</sup> which has informed its content. It has been produced in accord with the Council's Local Development Scheme (LDS) albeit, due to a need for additional consultation, the examination process has been extended beyond the anticipated timeframe. The LDS has been updated during the course of the Examination<sup>11</sup> and the Council intends further updates upon adoption of the CS. With due regard to the Framework<sup>12</sup>, I am satisfied that there is clear justification, based on the complexity of the issues and the scale of the county, for the adopted approach of the LDS which identifies the additional planning documents to be produced within Wiltshire<sup>13</sup>. For reasons

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<sup>9</sup> Formerly RPG10

<sup>10</sup> See Core Strategy Document List et al

<sup>11</sup> EXAM/78B

<sup>12</sup> Para 153

<sup>13</sup> EXAM/78B Table 2

of clarity and effectiveness, the revised intentions of the Council should be reflected within the CS and I recommend accordingly (**MM1**). On the balance of the available evidence, suitable regard would appear to have been had to the Council's Statement of Community Involvement<sup>14</sup> in the overall plan production process.

16. The CS contains a Vision that is predicated upon sustainable patterns of development focussed on the settlement hierarchy of Wiltshire wherein partnership working with communities is key. Underpinning the vision are six specific, albeit cross cutting, strategic objectives that encompass all policy areas deemed necessary for the document; these address economic, social and environmental considerations in the context of national policy. These are set out clearly within Section 3 of the CS. I am mindful that the vision and the strategic objectives have been developed through an iterative process which has drawn upon the evolving evidence base and the various rounds of community consultation. Whilst individual opinions may vary upon the specific wording of both the vision and the strategic objectives, I am satisfied that these embodied principles are justified adequately by the evidence. With particular regard to transport issues, these can be incorporated reasonably into the broad heading of 'Infrastructure' within Strategic Objective 6 and such an approach does not represent a flaw in the plan.
17. There is adequate evidence within the text of the CS, for example in relation to the community areas of Wiltshire, that the Council has had due regard to the existing Community Strategy<sup>15</sup>. The CS has been subject to an Equalities and Diversity Impact Assessment<sup>16</sup> which follows a reasonable and robust methodology. This broadly and reasonably concludes that the plan would have a positive and inclusive impact on equality and diversity throughout the county.
18. The Council has confirmed<sup>17</sup>, with due regard to the publication and availability of documents, advertisements and notification, that it considers that the CS has been prepared in accordance with the statutory procedures and associated regulations. In this regard, I am mindful of the range of information produced via the Council's consultation processes and which are summarised in the Consultation Methodology Output Report<sup>18</sup> and elsewhere<sup>19</sup>. The body of evidence indicates adequate procedural compliance.
19. Although the Framework was issued whilst the CS was being prepared, the Council has confirmed that the submitted plan, when considered as a whole, has been produced to be consistent with national policy. Various concerns have been raised from the consultation processes as to whether the document places an undue emphasis upon economic priorities to the potential disadvantage of, for example, considerations affecting the natural environment. The Council considers that the CS seeks a balanced approach to sustainable development in accordance with the Framework; such balance is important and, for the purposes of effective implementation, the addition of

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<sup>14</sup> SCI/01

<sup>15</sup> CPP/08 Wiltshire Community Plan 2011-2026: 'People, Places and Promises'

<sup>16</sup> WCS/03

<sup>17</sup> WCS/PS/M1

<sup>18</sup> WCS/02 – Regulation 22(1)(c) Statement

<sup>19</sup> Section 5 of Document Library et al



text to the introduction of the document would ensure specific consistency with the Framework. I have recommended accordingly (MM1).

20. The CS plan period extends to 2026. Whilst this is not the preferable 15 year horizon advised by the Framework, such a period is specifically supported by the available evidence and, on balance, is sufficient to be considered appropriate and does not run counter to the PPG. Simple extrapolation of growth rates to extend the CS period would be a crude means to simply meet a 15 year aspiration; such an approach is not warranted in light of the Council's intention to monitor the effect of the CS and to ensure it is subject to partial review at an early date. Indeed, the Council has clarified<sup>20</sup> that it will be undertaking a planned early review of the CS to ensure "the development provision looks to an appropriately long term end date" which will be supported by an updated Strategic Housing Market Assessment (SHMA). Further detailed matters relating to the Framework are discussed below.
21. The Council confirms that Appendix D of the CS provides a clear indication of 'saved' policies subject to its proposed changes<sup>21</sup> deemed necessary following a post submission review. To ensure consistency and effectiveness, I recommend further in relation to Purton Brickworks (**MM2**). The Council intends that the programmed CS Review will provide a suitable opportunity to reassess such saved policies with a view to their replacement. Such an approach is a practical way forward albeit I recommend further with regard to Westbury (see below).
22. The Policies Maps have been altered to reflect the content of the CS and there is no evidence to suggest that the Council's commitment to ensuring they are updated, maintained and kept under review as necessary will not be met.
23. The submitted CS has been informed by an iterative process of SA<sup>22</sup> which the Council considers to have been inclusive<sup>23</sup>. It is a matter of fact that the SA process has been undertaken with each consultation draft of the CS since 2009 with the intention of satisfying the SEA Directive and associated regulations<sup>24</sup>. Such ongoing work incorporates the post submission CS changes proposed by the Council. As part of the SA process consideration has been given to reasonable alternatives to the submitted content of the CS and its policies. The Council considers that the SA adequately summarises or repeats the reasons that were given for rejecting alternatives at the time when they were ruled out and that those reasons remain valid. Whilst specific details of this process are analysed as necessary in subsequent sections of this report, including matters affecting strategic allocations and contingency, the evidence indicates that the Council has undertaken a proportionate and adequate degree of SA relevant to the CS and its content.
24. The Council identifies<sup>25</sup> that it has discharged its obligations under the Habitats Directive and associated Regulations such that it is satisfied that the Plan,

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<sup>20</sup> EXAM/108

<sup>21</sup> As revised in EXAM/04 and EXAM/56

<sup>22</sup> See SUS/11 – 20, 26, 27, EXAM/05 – 5E, EXAM/57, EXAM/88, EXAM/99 et al

<sup>23</sup> WCS/PS/M1

<sup>24</sup> The Environmental Assessment of Plans and Programmes Regulations 2004: Statutory Instrument 2004 No. 1633

<sup>25</sup> WCS/PS/M1 and SUS/36, EXAM /58, EXAM/89 et al

either alone or in combination, will not affect adversely the integrity of any Natura 2000 site. In so doing, it relies heavily upon its 'Assessment under the Habitats Regulations'<sup>26</sup> which sets out a reasonable methodology<sup>27</sup> for identifying sites that could be affected by the CS, the 'key issues' likely to cause significant effects, their analysis (alone and in combination) and appropriate assessment (AA) of all likely significant effects for each Natura 2000 site. In support of its approach, the Council has published three specific further planning documents<sup>28</sup> addressing Natura 2000 sites with the intention that adverse effects from development may be avoided.

25. I am mindful that there is no outstanding objection from Natural England with regard to the approach taken by the Council to Natura 2000 sites. In particular, the Council has completed a Statement of Common Ground with Natural England<sup>29</sup> wherein "*both parties agree that the Council has carried out a Habitats Regulations Assessment of the potential effects of the Plan upon the Natura 2000 network both alone and in combination with other plans and projects...*". Agreement is reached that the CS would not have any adverse effects upon the integrity of any European designated site subject to certain amendments shown within the schedule of preferred changes of the Council. Indeed, I also note SOCG/33<sup>30</sup> which clarifies additional potential changes to the CS. Natural England also states that it has no outstanding concerns with respect to the SA for the purpose of The Environmental Assessment of Plans and Programmes Regulations and European Directive 2001/42/EC. With due regard to the available evidence, nor do I.
26. Submissions have been made to the Examination that the Council is failing to meet its obligations with regard to the HRA, the Habitats Directive and the associated regulations. However, in considering the Habitats Directive et al, the Council has been mindful of the strategic nature of the CS which seeks to identify the broad strategic needs of the county and a broad delivery framework based on a clear settlement hierarchy. The Council places reliance on the role of neighbourhood planning to assist in delivering the development required in addition to the strategic allocations identified for key settlements within individual Community Areas. The Council will also be producing its Housing Sites Allocation DPD (Sites DPD) which will be subject to separate HRA. Based upon this approach, the Council considers that its submitted HRA is a proportionate and adequate analysis of the CS in relation to Natura 2000 sites and that, with the modifications proposed to the submitted plan, there will be no adverse effect upon their integrity. With regard to the input of Natural England, including the Memorandum of Understanding<sup>31</sup>, I agree.
27. There remains an evident need for project level work to be undertaken in relation, for example, to strategic allocations that are sensitively located in relation to Natura 2000 sites; these are discussed in greater detail below as necessary. However, the content of the CS and the safeguards it contains means that the plan, alone or in combination should not have a significant

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<sup>26</sup> SUS/09 and SUS/36 and EXAM/58, EXAM/89

<sup>27</sup> SUS/36 Section 2 et al

<sup>28</sup> CPP/118; STU/207; STU/208 – Stone Curlew Mitigation Strategy; River Avon SAC Planning Procedure; Wiltshire Bats SAC Planning Guidance

<sup>29</sup> SoCG/5 (inc Addendum)

<sup>30</sup> Statement of Common Ground with Campaign to Protect Rural England

<sup>31</sup> EXAM/108

adverse effect upon the integrity of any Natura 2000 site.

28. Wiltshire is a predominantly rural county. It has areas of national significance as determined by the partial presence of three Areas of Outstanding National Beauty (AONBs) and part of the New Forest National Park; these factors are reflected specifically in Core Policies 51 and 25 respectively. The Stonehenge and Avebury World Heritage Site is also present. Submissions have been made that the CS has failed to consider adequately the presence of AONBs within the county and consequently their national significance<sup>32</sup> has not been taken into account sufficiently in the distribution of development. Concerns have been raised that the formulation of the CS and its evidence base has not sought to differentiate adequately between AONBs and other parts of the county.
29. The Council considers that adequate regard has been had to the presence of AONBs although has subsequently proposed changes to the CS to clarify its approach, particularly in relation to Core Policy 51. Such changes emphasise the statutory purpose of such designated areas. Notwithstanding subsequent discussion below in relation to Marlborough, Warminster and Core Policy 51, I agree that the evidence base could have more clearly recognised the potential effect that AONB designation would have upon development proposals and its distribution at the general level, for example the Strategic Housing Land Availability Assessment (SHLAA)<sup>33</sup>.
30. However, such evidence certainly does not prohibit the AONB designations from being a material consideration in subsequent decision making nor does it indicate that unsuitable development would necessarily be required or be acceptable in such sensitive landscape areas. I recommend modifications which will ensure consistency with national policy and adequate effectiveness (**MM 3**). Based upon the discussion at the hearings and the submissions made, it is apparent that all parties need to maintain a constructive dialogue to ensure a common understanding and compatibility of approach towards the AONBs and new development proposals. Whilst further detailed matters are addressed below, the modified CS at a strategic level takes an approach towards such sensitive areas that is sufficiently consistent with national policy and is justified.

## **Matter 2 – Settlement Hierarchy and Delivery (Policies CP1 & 2)**

### ***Is the settlement strategy justified by the evidence base and will it be effective in realising the objectives and vision of the CS?***

#### Core Policy 1 Settlement Strategy

31. Chapter 4 of the CS sets out how the Vision will be delivered through the spatial strategy for Wiltshire. Fundamental to this process is the settlement strategy set out by Core Policy 1 which indicates the hierarchy of settlements within the county. This hierarchy is informed adequately by the Council's analysis of the role and function of settlements<sup>34</sup> which takes into account the geographic position of each settlement and the surrounding area within which

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<sup>32</sup> Framework paragraph 115 et al

<sup>33</sup> STU/05

<sup>34</sup> TOP/04 - Topic Paper 3 et al

it is located. Consequently, the Principal Settlements are identified robustly alongside the Market Towns, Local Service Centres and, with only a few exceptions which are referenced further below, the Large and Small Villages.

32. Market Towns are identified as settlements that have the potential for significant development. Based on the Council's analysis of the role and function of those identified, the approach of CP1 seems justified albeit that there is no automatic necessity that all market towns within Wiltshire should have strategic allocations identified. Future development may occur in a potentially significant manner through other means; for example, allocations within the Sites DPD.
33. Further analysis of relevant settlements is undertaken as necessary in each Community Area elsewhere in this report, however, the balance of the available evidence does not support the designation of Pewsey as a Market Town at this time due to its relatively limited size and employment base. Similarly, Purton occupies a somewhat unique position close to Swindon and Royal Wootton Bassett. Despite its secondary school, the evidence does not substantively indicate that it serves a wider rural hinterland in other regards and it has a somewhat limited role in terms of its employment provision and basic level of facilities. I conclude that it is suitably referenced within the submitted CS.
34. Large and Small villages are also indicated adequately within the CS on the basis of the analysis the Council has undertaken. There is insufficient evidence to the contrary that warrants alterations other than the limited changes identified by the Council which are based upon updated information. For the reason of justification and effectiveness I recommend such modifications accordingly (**MM 4**).
35. The CS refers to defined settlement boundaries for the hierarchy at the level of Large Villages and above. By such means the Council intends to provide clarity on what forms of development may be carried out where in a manner consistent with the Framework. There is no compelling evidence to suggest that such an approach is flawed, particularly in the context of the Planning Practice Guidance which indicates all settlements may play a role in delivering sustainable development in rural areas<sup>35</sup>.
36. However, the Council has not reviewed the extent of the boundaries to inform the CS; instead relying upon the pre-existing development plan documents. Some of these were adopted several years ago, for example the Kennet Local Plan (2004), and it cannot be argued with great strength that the settlement boundaries contained therein are up to date for the purposes of the CS plan period. Indeed, the Council concedes in Topic Paper 3 'Settlement Strategy' that whilst existing boundaries offer protection to the countryside and guard against urban sprawl/ribbon development they are out of date, do not reflect current urban form and require review and updating ... 'a new boundary would be the ideal solution'<sup>36</sup>. To review boundaries, the CS identifies community led planning as the vehicle to deliver the necessary updates. However, there remains a considerable risk that, for example, Neighbourhood Plans will not be

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<sup>35</sup> PPG Paragraph: 001 Reference ID: 50-001-20140306

<sup>36</sup> TOP/04 p46

delivered across the county in a comprehensive or timely fashion. Such an outcome would, in the context of the CS Settlement and Delivery Strategy, potentially preclude development initiatives on the basis of an unjustified evidence base and therefore not represent a positive form of planning.

37. The large geographic scale of Wiltshire and the sheer number and variety of its settlements does present challenges to the practical completion of an appropriate and swift review of settlement boundaries. Rather than delay to a disproportionate extent the potential adoption of the submitted CS, there is scope to advance such a timely review through a subsequent development plan document. The Council proposes that such matters could be resolved adequately by the Sites DPD. In short, I agree. Such work can complement that emerging from any advanced community led planning process and would not hinder the review of settlement boundaries in the future. To facilitate the early and effective delivery of development based upon up-to-date evidence I modify the CS accordingly (**MM 5**).
38. Many submissions to the Examination identified the need for CP1 to reference the presence of other settlements such as Bath and Swindon. Clearly, the CS is intended to be the development plan pertinent to the administrative area of Wiltshire Council and therefore its focus is upon the relevant settlements of the area. Nonetheless, the Council acknowledges, for example through the key diagram, its Statements of Common Ground and via joint working initiatives, that neighbouring settlements influence the role and function of settlements within Wiltshire and affect development pressures across the county. Whilst the CS could contain appropriate reference to neighbouring key settlements, for example in the supporting text to CP1, the absence of specific reference does not, in the overall context of the plan, render the document unsound.

#### Core Policy 2 Delivery Strategy

39. CP2 sets out the Council's approach to delivering new development across the county. As submitted, the policy has been somewhat overtaken by events and is consequently not well supported in its detail and is potentially ineffective. However, the Council has suggested changes to CP2 and its supporting text to clarify the indicative nature of the revised housing and employment land figures quoted and the positive manner in which the Council envisages development being brought forward across the county. Whilst the specific amount of housing and employment land is discussed under Matters 3 and 4 (below) and notwithstanding the way in which residual requirements are ultimately expressed, the revisions to CP2 provide a sufficiently clear indication of the levels of housing and employment land intended over the plan period.
40. The overall indicated quantities of development provide a flexible and positive basis for provision to meet predominantly the needs of the area. These are appropriately expressed as minimums. The policy is underpinned by an aspiration to deliver sustainable patterns of development based upon the settlement hierarchy and through the appropriate use of, where suitable, previously developed land. Furthermore, the policy enables strategic development for certain sites to occur which will be subject to individual masterplanning and community engagement; these sites are discussed in

greater detail in relation to individual community areas. Overall, the general approach embodied in CP2, as proposed to be changed, is consistent with national policy, is justified and consequently sound.

41. Within defined settlement limits the CS maintains a presumption in favour of sustainable development. Outside of such limits, including Small Villages, development will be limited to that which meets certain criteria. The exceptions policies of the CS may also be applied. CP2 therefore relies heavily on the existence of settlement boundaries to manage growth. Whilst the principle of such an approach may be justified in terms of providing plan led clarity to what development may go where, the efficacy of the plan is partially undermined by the absence of particularly robust evidence in support of the identified limits for each settlement. Whilst a combination of commitments, windfalls and strategic allocations may ensure a supply of development land to meet needs in the shorter term, the effectiveness of CP2 in combination with CP1 is dependent upon a timely review of settlement limits as described in paragraph 37 above. This factor reinforces the justification for MM5.
42. Subject to a review of the settlement boundaries, the CS provides a clear framework for decision making in relation to new development. CP2, as proposed to be altered by the Council, incorporates sufficient flexibility so as to be effective in its operation. Thus the objective to develop on previously developed land is guided by an approximate and not prescriptive target of 35%; furthermore, there remains scope to develop outside of current settlement boundaries subject to policy review/further development plan production or community led plans. CP2 provides a clear yet flexible framework for delivering a range of development across Wiltshire that is not skewed unduly to the identified strategic sites. The Sites DPD will provide a further opportunity to clarify and maintain the delivery of adequate housing.
43. The CS is clear that the distribution of housing land in terms of ensuring adequate supply will be disaggregated in accordance with three housing market areas. I am satisfied, based on the broad assessments of housing need, that such an approach is an appropriate scale for consideration rather than the smaller community areas which would limit the flexibility and effectiveness of the plan. I am also satisfied that the identification of indicative levels of housing for Community Areas is not unduly rigid or prescriptive; such an approach will enable suitable flexibility to be applied by the Council in managing the effective delivery of necessary housing within the HMAs.
44. As noted above the Council has proposed changes to CP2. These clarify the nature of the policy and its indicative ambitions for new development. For reasons of justification, effectiveness and consistency with national policy, I recommend accordingly (**MM 6**).

### *Summary*

45. The settlement strategy, as proposed to be modified, is justified by the evidence base and will be effective in realising the objectives and Vision of the CS as a whole.

### **Matter 3 – Economy (Policies CP2 & CP34 – 40)**

***Does the CS provide the most appropriate and robust strategy for the economy with due regard to cross border issues? Is the approach evidenced adequately and consistent with national policy? Will the approach be effective?***

#### Employment Land

46. CS Strategic Objective 1 sets out the Council's aim to secure a resilient, sustainable and competitive economy, characterised by higher value and higher skilled jobs aligned with the objectives of the Swindon and Wiltshire Local Enterprise Partnership (LEP). The evidence base which underpins SO1 and the delivery policies within the CS is comparatively extensive and incorporates both quantitative and qualitative considerations, including the Wiltshire Workspace and Employment Land Review<sup>37</sup> and a range of information produced to inform the adopted South Wiltshire Core Strategy.
47. Amongst other sources, the Council's Topic Paper 7<sup>38</sup> 'Economy' and its position statement<sup>39</sup> identify a range of economic issues affecting Wiltshire, including an historic outward facing economy and the impact that the proximity of major centres of economic activity, including the more distant effects of London, have upon the county and its settlements. There is adequate evidence of joint working arrangements with nearby authorities such as Swindon, Bristol and Bath and North East Somerset such that the CS has been informed adequately by the wider regional context. The Duty to Cooperate has been addressed adequately in this regard.
48. The evidence provides an analysis of the character and sector influences within the Wiltshire economy with due regard to its regional and spatial context and, in essence, has led to a strategy which seeks to reduce net out commuting through the provision of increased numbers of local jobs. The CS aims to increase the degree of self-containment within Wiltshire's communities and deliver significant private sector employment opportunities.
49. To do so, the CS contains a suite of related policies that intend to aid economic growth. The provision of employment land throughout the county, reflecting the settlement hierarchy and the economic zones of the LEP, is intended to enable inward investment opportunities, particularly for small and medium sized businesses, whilst providing growth opportunities for indigenous employers. The CS will provide at least 178 ha of new employment land spread throughout the community areas of Wiltshire. As set out in CP2, this will be delivered through a combination of new strategic allocations, through mixed use urban extensions and through retained Local/District Plan allocations. This figure is ambitious but is broadly supported by the available evidence and I have no substantive reason to consider it is not justified adequately.

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<sup>37</sup> STU/20

<sup>38</sup> TOP/11

<sup>39</sup> WCS/PS/M3

### Additional Employment Land

50. Core Policy 34 provides for the supply of employment land in addition to that allocated by the CS. The policy is consistent with the thrust of the overall plan through its positive approach to development within larger settlements. The Council has suggested changes to clarify the approach to be taken in relation to office development and to clarify the cited criteria. Such alterations will aid the effectiveness of the policy in its operation, ensuring adequate flexibility for the consideration of a broad variety of potential developments. The Council's changes would also clarify the approach to be taken towards developments that may address the wider strategic interests of Wiltshire's economy which necessitates a greater degree of flexibility. I recommend such modifications accordingly (**MM7**) with a necessary addition to criteria 'iii' that recognises the role of existing businesses within villages.

### Existing Employment Sites

51. The Council's evidence base, including Topic Paper 7, its associated documents and the SA, provides an adequately robust assessment of existing employment sites throughout the county. It provides adequate justification, with due regard to alternatives, for the retention of Principal Employment Areas, particularly given the aim of Strategic Objective 1. As indicated by the Framework, the Council will need to regularly review its land allocations particularly where local circumstances indicate a limited need for employment land or where specific constraints to delivery may exist. This can be undertaken through the monitoring framework and potentially through either the review of the CS, the production of subsequent development plan documents or via community led planning initiatives. Nonetheless, the Council's proposed changes to the CS provide a degree of flexibility towards the release of employment land, including that within Principal Employment Areas and, subject to slightly alternative text, I recommend accordingly (**MM8**). Overall the approach of CP35 is justified adequately and will be effective in operation.

### Economic Regeneration

52. Core Policy 36 relates specifically to the regeneration of previously developed land within higher order settlements. The policy seeks to take a positive approach to regeneration opportunities, subject to any proposals assisting the specific strategy for the relevant settlement and/or enhancing the viability and vitality of any affected town centre. As such, and subject to the modification proposed by the Council, the policy accords with the thrust of Sections 1 and 2 of the Framework. I recommend accordingly (**MM 9**).
53. The policy is less clear as to the approach to be adopted in relation to Large and Small Villages. The Council has indicated that neighbourhood planning processes may address economic regeneration opportunities in other locations but, while such circumstances may not be common within smaller settlements, this is not contained within CP36 or its supporting text. To provide clarity for reasons of effectiveness, I modify the CS accordingly (**MM 10**).

### Military Establishments

54. Wiltshire has a history of military activity which is acknowledged within the



evidence base<sup>40</sup>. Whilst many sites remain in active use, others have become surplus to requirements. The Council appears to have effective working arrangements in place with the Ministry of Defence and Core Policy 37 aims to provide a strategic policy lead on two levels. Firstly, it clarifies how new development and changes of use of operational facilities may be considered and, secondly, how the redevelopment, conversion or change of use of redundant sites and buildings will be resolved.

55. The Council's approach is sufficiently clear. Whilst concerns have been raised as to the effectiveness of Core Policy 37 with regard to its flexibility, I am satisfied that the policy is consistent with the sustainability aims of the Framework and the overall thrust of the CS. New development linked to operational capability will be supported. Appropriate redevelopment, conversion or changes of use will be permitted subject to the proximity of sites to existing settlements and the nature of the end use; economic led development through a masterplanning process will be favoured.
56. The Council has proposed a change to CS paragraph 6.23 which, whilst providing further clarity to the intentions of Core Policy 37, is not essential to secure the soundness of the CS. Overall, the approach of Core Policy 37 is justified, consistent with national policy and will be effective.

#### Retail and Leisure

57. With regards to retail and leisure matters, the CS is informed by a reasonably broad evidence base which includes the Council's Topic Paper 6 and the Wiltshire Town Centre and Retail Study<sup>41</sup>. Such evidence undertakes a proportionate analysis of existing settlement functions and incorporates suitable consideration of both quantitative and qualitative requirements across the county; these are reflected as necessary in the relevant community area policies.
58. Core Policy 38 seeks to enhance the vitality and viability of town centres in a positive manner that is consistent with the overarching thrust of the Framework. The Council has proposed a threshold for a retail impact assessment which, whilst low, is justified adequately by the available evidence; it provides a degree of protection for smaller centres from harm that may arise from more significant out of centre proposals.
59. The Framework requires that plans should, amongst other matters, define the extent of town centres and primary shopping areas based on a clear definition of primary and secondary frontages in designated centres. In this regard, the CS relies upon preceding policy documents and their saved policies. Such plans are not up-to-date and therefore the robustness of the approach of the CS is undermined. The evidence base cannot be considered to be strong with regard to designated frontages. The Council proposes that the review of the CS will provide an early opportunity to update the designated town centres and their frontages. Whilst it would be preferable to have undertaken such a review prior to the submission of the CS, I am satisfied, on balance, that provided the Council commits to update its evidence expeditiously then the submitted CS operating alongside the Framework and other material

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<sup>40</sup> TOP/19 et al

<sup>41</sup> STU/95 and 94

considerations provides a proportionate approach whereby decisions can be made in the interim. I recommend a modification accordingly (**MM 11**).

#### Tourist Development and Accommodation

60. As indicated by the evidence base<sup>42</sup>, tourism plays a notable part within the Wiltshire economy. Core Policies 39 and 40 were consequently introduced to the CS to ensure its importance was reflected appropriately.
61. Core Policy 39 refers to tourist development and, in a manner consistent with the overall document, places a locational emphasis upon the settlement hierarchy. This supports the approach of the plan towards sustainable forms of development and is consistent with the Framework. The policy provides adequate flexibility for development away from settlements and may be considered justified and effective. The Council's suggested changes are not necessary for soundness.
62. Core Policy 40 relates to accommodation. The Council has proposed changes which will avoid an anti-competitive approach to new development and which will secure a suitably flexible policy basis for decision making both within and outside of settlements. To ensure an effective and justified approach, I recommend such modifications accordingly (**MM 12**).

#### **Matter 4 – Housing (Policies CP2 & CP43 – 47)**

***Is the Core Strategy's approach to housing provision sufficiently justified and consistent with national planning policy? With particular regard to deliverability, has the Core Strategy been positively prepared and will it be effective in meeting the varied housing needs of the county over the plan period?***

63. Strategic Objective 3 of the CS seeks to provide everyone with access to a decent affordable home and Core Policies 2 and 43 to 47 specifically address how the Council envisage this would be achieved.
64. With the aim of boosting significantly the supply of housing, the Framework is clear that an evidence based approach should be taken to ensure that any Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area (HMA) as far as is consistent with the other Framework policies. It is consequently important that the full objectively assessed needs are quantified. The Framework and the PPG indicate that Councils should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups.
65. The Council has produced a body of evidence which relates to the housing requirement for Wiltshire. The majority of such evidence predates the publication of the PPG and understandably therefore has not been prepared in that context. I am mindful that, notwithstanding the recommended methodology, the PPG states that there is no single methodological approach to the assessment of development needs. Amongst others, the Council's evidence includes Topic Paper 15 'Housing Requirement Technical Paper', its

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<sup>42</sup> TOP/11, TOP/12, STU/205, STU/93 et al

Housing Matters Paper<sup>43</sup> and its Wiltshire Council draft Strategic Housing Market Assessment<sup>44</sup> (Fordham). The Council considers its evidence to be PPG compliant. Such evidence incorporates data and analysis of household projections, migration, employment trends, affordability and more limited references to what the PPG and the Framework refer to as 'market signals'. In the context provided by the PPG on establishing the need for housing, I have also been mindful of the national statistics relating to household projections which were published in April 2013 upon which opportunity for public comment has been provided. Even more recently the Council has produced additional evidence pertaining to housing matters which I have taken into account<sup>45</sup>.

66. In devising its originally submitted housing figures, predating the publication of the PPG, the Council acknowledged the work it undertook during the preparation of the draft RS for the South West which did not reach final adoption. The draft RS (Proposed Changes) indicated a total housing figure for Wiltshire of 44,400 homes (2006-2026). Following the government's decision to revoke the RSS tier of plan making, the Council reassessed its housing requirements. Topic Paper 15 provides an indication of the key considerations that led to the housing figure contained within the submitted CS; these include the economic aspirations of the county, population growth, changes affecting military deployment within the county and general housing need.
67. The draft RS identified three HMAs within which parts of Wiltshire were located. These were generally broader areas than those defined by the Council's Fordham work and extended beyond Wiltshire's boundaries to encompass settlements such as Swindon, Bath and Bristol. Given travel to work patterns this is unsurprising. Subsequently, the Fordham work acknowledges the challenges faced in defining HMAs, particularly in a large rural county influenced by nearby urban conurbations and I accept that it is not a precise science. The Council, following the Fordham analysis, has elected to define three main HMAs lying within the county that are informed by factors which include an estate agents survey and a search patterns analysis. This does address some of the contextual, migration, house price data and other market signals relevant to Wiltshire as referenced in the PPG.
68. I have some reservations at the potential artificiality of delineating the Wiltshire HMAs in line with the county boundary, particularly where commuting information indicates the 'pull' of settlements such as Swindon and Bath. However, the Fordham work itself (Sections 3 and 4) does acknowledge the fact that the Wiltshire housing market is influenced by settlements further to the east, the west and the south. On balance and with regard to the ongoing work of nearby authorities with whom Wiltshire Council is engaged as recommended by the PPG, the three HMAs defined by the Council are an adequate basis upon which the housing requirement for the county can be assessed.
69. The Fordham evidence follows a reasonably comprehensive methodology in assessing aspects of housing need utilising a range of data which includes the

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<sup>43</sup> EXAM/02B

<sup>44</sup> STU/21

<sup>45</sup> Including EXAM/84-91, 109

2008 ONS population and household projections. This document provides an initial estimate that the net annual future housing need across Wiltshire is 3,724 households (disaggregated across the HMAs)<sup>46</sup>. With due regard to the Long Term Balancing Household Model used, the Fordham work indicates that 34,000 new dwellings are required over the 15 year period to 2026; dwelling completions to 2011 have been approximately 10,000.

70. During the course of the Examination, the Council clarified its position that, for the purposes of assessing the housing need of the relevant Wiltshire HMAs, its Strategic Housing Market Assessment (SHMA) is actually comprised of two documents: the Fordham work<sup>47</sup> (Dec 11) and Topic Paper 15 (Jan 12). Whilst these two documents appear to have been prepared in parallel, they are not readily assimilated to provide simple clarity as to the objective housing needs of the locality as required by the Framework which was subsequently published in March 2012.
71. In developing its preferred figure, the Council has applied a variety of considerations to the available data, for example assumptions relating to migration. In its analysis of housing requirements (Topic Paper 15), a number of population projections for Wiltshire based on different assumptions was developed. This ultimately led the Council to identify a broad range of housing requirements over the plan period in the order of 35,900 to 57,800 dwellings. The upper figure was derived from an economic led scenario, the lower figure from a job alignment scenario and a mid-range figure of 43,200 was based on a population led scenario (43,900 if allowing for concealed households). Topic Paper 15 indicates<sup>48</sup> that the Council's housing projections forecast the requirements for Wiltshire alone and make no allowance for neighbouring Swindon and that further development to the west of Swindon should be seen as being in addition to that required for Wiltshire.
72. With regard to its mid-range figure the Council considers that past population and migration trends are a useful benchmark for housing needs driven by demographic factors but that these should not be relied upon and will not continue over the plan period due to changes, for example, in economic conditions (away from historic buoyancy) and the effect of the CS policies themselves over time. However, there is little substantive evidence that such a change to past trends would necessarily occur. Paragraph 50 of the Framework recognises the role of planning for a housing mix based on current and future demographic trends, market trends and the needs of different groups. Consequently, I place some weight upon the demographic evidence which supports a housing need in the order of 44,000 over the plan period.
73. The Council's range is produced in the knowledge that the evidence, particularly the Fordham work, indicates a significant need for affordable housing. Indeed, the level of need appears so high that its delivery is not feasible based on historic completion rates for all housing or realistic projections.
74. Against this background and in relatively simple terms, the Council considers that its objectively assessed housing need for the plan period is 37,000 net

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<sup>46</sup> STU/21 para 10.7

<sup>47</sup> STU/21

<sup>48</sup> Para 5.6

additional dwellings, split across its three identified HMAs. The Council further indicates that for the anticipated 26,670 net additional dwellings (2011-2026) 14,700 should be for the open market, the remainder being shared ownership, affordable rent and social rented with a mix of housing size (see Tables 2 and 3 EXAM/02B et al). The submitted CS is consequently written to enable the delivery of at least 37,000 homes.

75. The Council's justification for the figure of 37,000 new dwellings is provided in the original Topic Paper 15 and elsewhere. However, whilst it represents the Council's preferred quantum of housing, I am not satisfied that it represents the objectively assessed housing need of the Wiltshire HMAs. Such a figure is certainly challenging to derive but the balance of evidence indicates that it is greater than 37,000:

- Based upon the Fordham work, allowing for completions and notwithstanding an affordable housing need that may exceed 1,100 dwellings per year<sup>49</sup>, levels of housing need appear to be in the order of 44,000 dwellings over the plan period.
- Based upon ONS population projections, the Council's evidence suggests the need would appear to be in the order of 43,200 (43,900 allowing for concealed households).
- Alternative assessments of housing need produced by interested parties have utilised the available data in different ways, for example employing the Chelmer methodology, to indicate that levels of need exist above 44,000 dwellings over the plan period<sup>50</sup>. Such approaches incorporate consideration of 2<sup>nd</sup> home ownership, vacancy rates and the economic aspirations of the Council. Ultimately they support an objectively assessed need that is significantly greater than the minimum CS figure of 37,000 dwellings over the plan period.

76. The 2011-2021 'Household interim projections in England' provide an update on the previously available data. However, I remain mindful that such data does not cover the plan period and therefore a degree of caution, due in part to its reliance upon trends observed over a comparatively short timeframe which includes a period of significant economic uncertainty, should be used in its application to the longer term housing needs of the county (ie beyond 2021). This data indicates a broadly similar rate of population change (2011-2021) to that anticipated by the 2008 ONS data albeit based on a greater population baseline and with a reduced rate of household growth (informed by a slower than anticipated decrease in household size). The way in which such trends are realised over the plan period is important and should be subject to review; meanwhile, more limited weight may be attributed to the 2011 data set as an indicator of longer term housing needs for the purposes of this CS.

77. Migration rates will undoubtedly influence levels of housing need within the county. The 2011 ONS projections are informed by mid-year population estimates which are lower than the 2011 census data subsequently produced. The 2011 ONS projections therefore make assumptions upon net migration that may bear further analysis in relation to the population figures recorded. Clearly reduced net migration will effect housing requirements and thus review

<sup>49</sup> STU/21 para 9.49 on

<sup>50</sup> See POS Barton Wilmore and Gladman and Redrow et al

is imperative to ensure adequate housing provision is made. The 2008 projections assume slightly higher migration levels which support a housing requirement in excess of the Council's minimum of 37,000 dwellings. It may be the case that migration will be affected by policy decisions and economic factors but at this moment in time greater weight should be given to the 2008 ONS projections and therefore I am not persuaded that other factors justify a housing need as low as 37,000 homes at this moment in time.

78. Overall, the balance of evidence suggests that the objectively assessed housing need, to be disaggregated across the three Wiltshire HMAs, is currently in the region of 44,000 dwellings over the plan period.
79. Paragraph 47 of the Framework indicates that a Local Plan should meet the full objectively assessed needs for market and affordable housing in the relevant HMA as far as is consistent with the other policies of the Framework. With this in mind, the Council is aware that the Framework requires a Local Plan to be aspirational but realistic (paragraph 154) and I accept that setting a housing requirement which is undeliverable may compromise the ability of the Plan to effectively deliver sustainable forms of development supported by adequate infrastructure. Topic Paper 15 indicates that past delivery rates have been able to average approximately 2,100 homes per annum during the period of 2001-2008 albeit falling to 1,647 in 2009/10. The Council considers that the potential deliverability of housing should result in a base for the dwelling requirement that does not exceed 43,200 new dwellings over the plan period which seems reasonable. Indeed, the evidence indicates that a notable increase in average housing delivery over the remainder of the plan period would be required to deliver, for example, in excess of 44,000 homes.
80. Nonetheless, the Framework calls for a significant boost to housing supply. Achieving an average delivery rate of 2,100 over the entire plan period, not merely the pre-recession period, would be significantly above recent annual performance and the longer term historic average as a whole; it would equate to some 42,000 homes. Whilst the achievement of such a figure should be subject to careful monitoring, the evidence indicates the fluctuations that can occur in the delivery of housing but does not conclusively indicate that such a delivery rate cannot be met during the course of the plan period to deliver the significant boost in housing required to go some considerable way to meeting needs. Against this context and mindful of the content of the LDS (partial CS Review), the subsequent intended early review of the CS, the Sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly.
81. Indeed, I am particularly mindful that the Council intends to produce a new SHMA by early 2016 which may revise the objectively assessed needs for the relevant HMAs affecting the county and which will inform its plan making processes. Consequently I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more. The measured delivery of necessary housing over the plan period does not necessitate undue 'frontloading' in the early years of the plan. Subject to monitoring and management, the approach contained within the CS appears to be appropriate within the Wiltshire context. Planned review of the housing needs and any

new evidence, for example the joint SHMA with Swindon Borough Council, will enable the Council to maintain its plan led approach to the provision of sufficient homes to address needs which may investigate further the need to utilise land outside of the county as necessary.

82. The Council has subjected its housing figures to SA. It's Option 1 related to a range of 35,800 – 42,100 which performed better in sustainability terms than its Option 2 of 56,800 dwellings which would have harmful negative effects in the sustainability balance. I do not consider that Option 3 (20,900 dwellings) is a reasonable alternative in the face of the county housing need. The SA indicates that "... even by providing housing at the higher end of the range, there will be opportunities to mitigate some of the impacts highlighted through strong policies promoting environmental protection within the Core Strategy..."<sup>51</sup>. However, whilst the SA considers that the mid-range housing scenario of Option 1 should be pursued, there is no substantive evidence that the upper range (42,100) would be unacceptably harmful in terms of sustainability. Indeed, I am mindful that the draft RS proposed 44,400 new homes for Wiltshire to 2026 and identified no specific sustainability or environmental constraints to such delivery. The subsequent evidence does not indicate a change in circumstance which would lead to a minimum figure of 42,000 not being justified and reasonable. This is not contradicted by the Council's revisions to the SA and HRA and is supported by the Council's update to Topic Paper 15. The relevant parts of modification MM6 are justified accordingly.
83. The evidence supports the CS disaggregation of new housing across the three HMAs of the county which is sound and the effectiveness of the plan is maintained by not inflexibly distributing housing at the more micro level of each Community Planning Area.
84. Building upon the submitted CS<sup>52</sup> where 200 homes were identified, the Council currently proposes to include 900 homes<sup>53</sup>, allowed via appeals, to the west of Swindon<sup>54</sup> within its modified minimum housing provision of 42,000 homes over the plan period. However, the submitted CS indicates that homes in this location would not actually contribute towards the Wiltshire housing requirement, are consequently excluded from the HMA and should be considered as an allowance rather than a requirement whereby in the event of their non-delivery no alternatives would be need to be found. The 900 homes is considerably greater than the 200 home allowance contained in the submitted CS and is proportionately significant. In the context of boosting housing supply and contributing towards meeting the objectively assessed needs of the county, this is a limiting approach. I note that Swindon Borough Council does not rely on these homes to meet its own housing requirement as set out in its emerging Local Plan.
85. Concerns have been raised through representations made to the Examination, that the 900 homes should not be counted as contributing towards the overall CS requirement as their occupation would essentially contribute towards meeting the housing needs of Swindon and that the overall Wiltshire

<sup>51</sup> EXAM/05 para 5.4.40

<sup>52</sup> WCS/01 para 4.29

<sup>53</sup> Now approximately 950 in actual permissions granted.

<sup>54</sup> Adjacent to the built edge of Swindon whilst within the administrative area of Wiltshire

requirement would remain to be met. Given that the 42,000 homes is a minimum to contribute towards meeting the needs of Wiltshire and that the Framework seeks to boost significantly the supply of housing, there is some validity to such concerns.

86. As referenced within Topic Paper 15, the Council's projections relate to the housing requirements for Wiltshire alone and exclude a Swindon allowance. I consider that a requirement for at least 42,000 homes should consider carefully the likely role of the permitted homes to be provided west of Swindon. Mindful of the appeal decisions themselves, the location of these permissions, and the methodology underpinning the disaggregation of housing across the HMAs, I consider that the practical reality would be that these homes must be considered as contributing towards meeting the housing needs of predominantly Swindon and to a much lesser extent Wiltshire, albeit the split between the two is unquantified. I cannot conclude that the housing requirement contained within the Wiltshire CS should be partially met by relying upon the delivery of approximately 900 homes to the west of Swindon.
87. I have considered whether the soundness of the CS as a whole is undermined by the approach taken towards these homes. Indeed, I have considered the necessity to modify the CS in order to specifically exclude either all or a proportion of the 900 homes from contributing towards the CS requirement of 42,000 homes or, alternatively, to raise the minimum requirement above 42,000. To do either would necessitate the identification of additional housing land within Wiltshire. Given that the Council has committed itself to an early review of the CS, that over 200 of the west of Swindon homes are anticipated to be delivered later in the plan period, from 2019/20 onwards, and that a small proportion of the west of Swindon homes will likely and practically contribute towards the Wiltshire housing requirement, I consider that any necessary additional provision would be proportionately small. This matter can be dealt with most expeditiously through the planned early review of the CS which will include the new joint SHMA, without prejudice to the overall soundness of the CS. As part of MM6 I recommend a change to CS Paragraph 4.29 accordingly.
88. The balance of the available evidence which includes the revised Housing Land Supply Statement (HLS) 2014<sup>55</sup> suggests, with due regard to a number of appeal decisions including at Malmesbury<sup>56</sup> that the CS will ensure an adequate five year housing land supply that is consistent with the Framework.
89. The supply of housing land at any given point in time is dependent upon a range of factors and the Council's HLS will invariably alter accordingly. Comparisons based upon previous decisions made upon planning applications and appeals are rarely reasonable or particularly helpful, for example due to the passage of time or the intervening resolution of site constraints. Indeed, with due regard to the appeal decision APP/Y3940/A/13/2200503, the Inspector's reasoning was based upon evidence debated in April 2014 before the most recent updates to the Council's HLS. Similar circumstances exist with regard to appeal decision APP/Y3940/A/13/2206963 whereby I consider that the strategic housing site at Marlborough may form part of the 5 year HLS

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<sup>55</sup> EXAM/91 and 109 and EXAM/114

<sup>56</sup> APP/Y3940/A/12/2183526 and APP/Y3940/A/13/2200503



and do not consider that the evidence I have been provided with in relation to housing sites at Tidworth and Ludgershall warrants an automatic reduction in the likely housing delivery arising. Inevitably, rates of housing delivery will be subject to careful monitoring and, if necessary, prudent management by the Council.

90. The Council's most recent submissions, including those made to the discussion at the Hearing session of 30<sup>th</sup> September 2014, identify a deliverable supply of housing land in excess of five years for each HMA and the county as a whole. Whilst it is clear that the delivery intentions for some sites have slipped, for example Ashton Park, Trowbridge, the HLS has sought to take such factors into account through the Council's engagement with the development industry as part of its data gathering processes. I have received no verbal or written submissions that lead me to find that the Council's current HLS, as updated, is not sufficiently robust.
91. I am mindful that the Council's land supply data includes strategic sites at Chippenham that will no longer form part of the CS. The deliverability of housing land at such sites will be further explored by the production of the Chippenham DPD that is intended to be adopted in 2015. Nonetheless, it is evident that much preparatory work upon site suitability has been undertaken and there appears to be a clear commitment from development interests to submit outline planning applications upon various sites in the next 6 months. Without prejudgement of the Chippenham DPD production process and notwithstanding the absence of plan led clarity at this stage upon the merits of such sites and the lead in times which precede actual house building, I find that it is reasonable to include the delivery of housing upon Chippenham sites within the HLS which are currently known to be deliverable. I agree with my colleague in the Malmesbury appeal decision<sup>57</sup> that to disregard such sites would not be justified at this time.
92. Therefore, whilst I have received submissions in relation to the five year housing land supply stated by the Council<sup>58</sup> and indicated by the trajectories of the plan (as proposed to be changed), including upon the deliverability and availability of certain sites, the balance of the evidence leads me to find that the Council's HLS, and consequently the CS, does demonstrate an adequate five year supply of housing land.
93. I have considered, as indicated by paragraph 47 of the Framework, whether the Council should demonstrate an additional buffer of 5% or 20% of housing sites. As illustrated by Table 1 of the HLS, housing completions have frequently met the annualised housing requirements of the extant development plans pertinent to each HMA over the last five years. This would justify the use of an additional 5% 'buffer' within the housing land supply.
94. However, it is clear that the CS plan period extends from 2006 and therefore it is not unreasonable to consider whether the Council has been able to secure housing completions against the requirements of the CS itself. The submitted CS required the county wide delivery of 1850 homes per year across the three HMAs. Housing completions at such a level were secured from 2006/7 to

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<sup>57</sup> APP/Y3940/A/13/2200503 Para 125

<sup>58</sup> And as clarified within EXAM/103 Appendix Aiv June 2014

2008/9 and again in 2013/14, with 1802 homes delivered in 2012/13. When considered across the county, this is not a record of persistent under delivery that warrants a five year housing land supply with a 20% buffer. With the exception of South Wiltshire (which has delivered housing within 10% of requirements on five occasions), the breakdown across the HMAs does not lead me to any different conclusion.

95. Nevertheless and even though I recognise that only recently has the Council proposed a change to the CS, the modifications referred to above indicate a requirement of 42,000 homes over the plan period, equating to 2100 per annum with disaggregated increases in each HMA. Such a requirement was met county wide in 2007/8 and in 2013/14 whilst performance in the East HMA and the North and West HMA have, on occasions, met the indicative requirements. Against such requirements and when considered as a whole, the Council's data does not confirm a persistent under supply of housing. In reaching this view I have had regard to the appeal decision at Malmesbury<sup>59</sup> where I am unaware of the detailed arguments presented to that Inquiry but which appear predicated on an earlier version of the HLS.
96. Inevitably, a balanced decision must be reached with regard to the available evidence. Mindful of the advice contained within the government's Planning Practice Guide<sup>60</sup>, I take a pragmatic approach to the evidence. The Council has committed itself to a producing a new SHMA, an updated SHLAA and a partial review of the CS in conjunction with a suite of DPDs. Progress is being made in bringing forwards key strategic sites that will contribute significantly towards the housing requirements of the county and each HMA, including that in South Wiltshire. On balance, I accept that the Council's HLS adequately demonstrates a five year supply of deliverable sites in accordance with the objectives of national policy and that a 5% buffer is acceptable.
97. In reaching this view I am mindful that windfalls are a not inconsiderable component of the five year housing land supply. Indeed, the Council promulgates three methods of calculating windfall allowances all of which have some credibility and which produce a county wide five year range of housing delivery between 940 and 2713 homes<sup>61</sup>. The Council has elected to take a conservative estimate of likely windfalls yet the evidence is sufficiently compelling to suggest that the likely rate of housing delivery on such sites, both large and small, will be greater. This factor supports my conclusion that the Council can demonstrate a five year supply of deliverable sites (+5%) in accordance with the Framework.
98. As noted above, the increased housing requirement within the CS, equating to 2100 homes per annum, has not been consistently delivered since 2006. The consequent shortfall is relatively small and is intended to be addressed over the remaining plan period. Whilst mindful of the government's advice, I am also conscious of the Council's planned early review of the CS, SHLAA updates and proposed SHMA work which will provide it with an opportunity to review both housing needs and the effectiveness of existing and proposed delivery intentions. The CS is not unsound as a consequence.

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<sup>59</sup> APP/Y3940/A/13/2200503

<sup>60</sup> Planning Practice Guide Paragraph 035 Reference ID: 3-035-20140306 (Sept 2014)

<sup>61</sup> EXAM/109 Appendix 5 Table A.7

99. The balance of the evidence<sup>62</sup> indicates that there is an adequate supply of housing land for years 6-10 and beyond consistent with the objectives of the national policy.
100. The overall housing requirement over the plan period will, following the Council's proposed changes as recommended, be disaggregated across the three HMAs and delivered through a combination of CS policy and DPD/ neighbourhood plan production wherein public consultation will be required. Given the geographic scale of Wiltshire and the volume of housing proposed, I consider such an approach to be robust and satisfactory.

### **Affordable Housing**

101. The Council acknowledges that there is a considerable requirement for affordable forms of housing, of various tenures, and that the CS will deliver a shortfall when measured against need. It should be recognised that an increase in overall housing provision will mitigate to some small degree such an eventuality and the Council indicates that the CS, as amended (MM14), will aim to deliver some 13,000 affordable homes over the plan period.
102. Core Policy 43 establishes the Council's in-principle approach to securing affordable housing provision or contributions on all sites. Given the level of need throughout the county, such an approach, utilising market housing, is justified.
103. The submitted policy contains a requirement for 40% (net) affordable housing provision upon sites of 5 or more dwellings with a financial contribution on smaller sites. The tenure of affordable housing will be determined on a site by site basis in the context of Core Policy 45 which seeks, in broad terms, a suitable range to meet local needs. The Council cites its Affordable Housing Viability Assessment<sup>63</sup> as providing justification for the approach of the plan. Whilst the Assessment appears robust in its methodology and analysis, it does not however provide unqualified support for the content of Core Policy 43.
104. Whilst STU/51 provides some support for the policy figure of 40% affordable housing for both the strategic sites and other notional sites, it does so primarily on the basis of tenure being affordable rent; if, for example, social rent were required, STU/51 indicates the likely need for flexibility to be necessary in securing other potential infrastructure, particularly in areas of lower economic value. Similarly, STU/51 indicates that 40% affordable housing can only be required on the basis of the Code for Sustainable Homes Level 4 in the context of providing housing for affordable rent and that Code 5 from 2016 would only be viable if supported by a proportionate increase in sales values in the intervening period.
105. As referenced by the Home Builders Federation and others, the Framework requires a Local Plan to be produced with due consideration of relevant standards and policies together with their impact upon development throughout the economic cycle. It would therefore appear that a range of tenures to deliver 40% affordable housing without subsidy (accommodating changes to the Code for Sustainable Homes) is most challenging to secure

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<sup>62</sup> Including EXAM/108

<sup>63</sup> STU/51

under current and foreseeable circumstances. The CS can reasonably be aspirational but must also be capable of effective delivery.

106. The Council has proposed to delete its requirement for affordable housing to be constructed to the latest Housing Corporation Standards which would affect the costs of construction and I recommend this modification to aid the effectiveness of the Plan in its delivery (**MM 13**).
107. The submitted CS was not supported by evidence which analysed alternative affordable housing proportions, for example those lower than 40%. Whilst being progressed, the details of the Council's intended Community Infrastructure Levy are yet to be Examined and finalised. The Framework (para 173) is clear that the sites and scale of development in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. With particular regard to STU/51, the CS approach to affordable housing does appear to threaten the delivery of key elements of the plan.
108. Core Policy 43 acknowledges that the provision of affordable housing may vary on a site by site basis with regard to factors which include development viability. This represents a degree of flexibility which can aid the effectiveness of the plan. Nonetheless, the CS should be justified adequately and the balance of the evidence does not currently support the 40% figure as a minimum requirement for affordable housing on sites of five dwellings or more.
109. Following the Hearing sessions, the Council usefully undertook further work with regard to affordable housing and development viability<sup>64</sup> with due regard to the categorization of the county based upon four 'price areas'. Such evidence has been prepared in the knowledge of preceding work informing the Council's CIL Schedule (eg BNP Paribas) and in light of advice such as provided by the Local Housing Delivery Group<sup>65</sup>. I consider it to be proportionate to the strategic purpose of the CS. Inevitably assumptions upon factors such as build costs, infrastructure requirements, contingency and market fluctuations will influence the recommendations arising from such work. However, the evidence appears considered and underpinned by justified assumptions where necessary. I am satisfied that the evidence provides further suitable and proportionate analysis of the matters affecting Core Policy 43 and is sufficiently robust in its analysis for conclusions to be drawn.
110. It has led the Council to propose a variety of changes to the CS, in particular to acknowledge a two tier approach to requiring the provision of affordable housing on sites of 5 or more dwellings which will be indicated upon the Policies Map. I have been mindful of the submissions made to such changes. Whilst such a two tier approach does risk being a rather blunt tool to address the issue of appropriate affordable housing provision, Core Policy 43 does maintain an important flexibility to consider on a specific site basis the necessary provision of affordable housing. Similarly, the 5 unit threshold is supported adequately by the Council's evidence and there is insufficient justification to warrant any alternative threshold, for example 10 units. Core

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<sup>64</sup> EXAM/85 and 86

<sup>65</sup> Viability Testing Local Plans – Advice for Planning Practitioners June 2012

Policy 43 will enable the bespoke consideration of schemes which may involve more unusual circumstances and potentially higher development costs, for example the conversion of heritage assets.

111. With due regard to the updated evidence, which also clarifies that smaller sites would not reasonably be required to contribute towards affordable housing provision, I am satisfied that the revised approach and policy content is justified adequately and robustly. The practical effectiveness of Core Policy 43 will be capable of being assessed through the Council's monitoring processes and, if necessary, may be subject to review and amendment.

112. For reasons of integration and social balance the intention of Core Policy 43 to disperse affordable housing throughout a development is sound.

113. I therefore recommend a modification to Core Policy 43 and its supporting text (**MM14**). The strategic site development templates are indicative and it is reasonable to maintain therein the appropriate percentage provision as a consequence albeit recognising that Core Policy 43 will apply. Subject to the modifications outlined above, the approach of the CS is justified and will be effective.

### **Exceptions Housing**

114. Core Policy 44 relates to 'Rural exceptions sites' and is broadly consistent with the Framework. It seeks to facilitate the small scale provision of affordable housing linked to local needs following a criteria approach. The policy enables the exceptional provision of a proportion of market housing as means of obtaining a financially viable form of development which is both justified and consistent with national policy. With due regard to the wording of the policy and its supporting text, there is no substantive evidence to suggest that the policy would necessarily cause harm to, for example, Areas of Outstanding Natural Beauty. Subject to the Council's proposed changes which are necessary to ensure an effective policy that is consistent with national policy, the aim and content of the Plan in this regard is justified (**MM15**).

### **Meeting Wiltshire's housing needs**

115. Core Policy 45 sets out the Council's approach to meeting the housing needs of the county and, as with all policies, must be considered in the context of the CS as a whole. As such, its content and justification draw suitably upon the available evidence sources such as the SHMA which addresses HMAs adequately. In this regard the CS is consistent with the objectives of the Framework, as expressed for example by paragraph 50. Adequate flexibility exists within the policy and its supporting text such that the strategic intentions of the policy will be capable of interpretation at the site specific level wherein viability, as provided for by Core Policy 43 for example, will be able to be taken into account.

### **Vulnerable and Older People**

116. The CS sets out a positive approach to the housing needs of vulnerable and older people via Core Policy 46 which is informed by a range of evidence sources including the SHMA and Topic Paper 2 'Housing'. The approach would be suitably effective if its flexibility was increased through the suggested

changes of the Council, which also extend detailed consideration of landscape matters, and I recommend accordingly (**MM 16**).

## **Gypsies and Travellers**

117. The 'Planning policy for traveller sites' (PPTS) was published in 2012 and, alongside the Framework, it sets out the Government's planning policy for site provision. The PPTS sets out the evidence based approach that local planning authorities should take in relation to gypsies and travellers; I am mindful of its content particularly paragraphs 8, 9 and 10.
118. Core Policy 47 has two related parts; the first sets out the pitch requirement for each HMA to 2021. The remainder of the policy establishes a criteria led approach to the consideration of proposals for development to accommodate gypsies and travellers which, with due regard to the PPTS (Policy B in particular), is broadly consistent with national policy.
119. The minimum pitch requirements are established by CS Table 6.2. As submitted, Core Policy 47 requires the provision of at least 82 permanent pitches, 25 transit pitches and 5 plots for travelling show people in the period 2011-2021. As indicated by the PPTS (para 6), there is an expectation that a robust evidence base exists to establish accommodation needs and inform the preparation of a local plan.
120. By its own evidence, the Council acknowledges that the Gypsy and Travellers Needs Assessment (GTAA) undertaken in 2006 and which informed the draft RS had a number of weaknesses that led to an underestimation of need and a consistent understatement of the level of requirement for residential pitches. It relied too heavily on caravan count data, failed to provide an accurate estimate of the travelling community residing in bricks and mortar, produced a low estimate of need from unauthorised sites and included a high pitch turnover on the supply side and did not examine adequately the needs of Travelling Showpeople. Furthermore, it also sought to provide an indication of requirements only between 2006 and 2011. The subsequent Proposed Changes to the draft RS increased pitch provision and were used by the Council to inform its Wiltshire Core Strategy Consultation Document (core policy 31).
121. Subsequent concerns as to the efficacy of the proposed pitch provisions led to what the Council has termed 'a light touch' review of the GTAA to provide revised pitch requirements for the period 2011-2021; it follows an approach which it considers to be based upon government guidance<sup>66</sup>. The pitch provisions in the CS are lower than those in its Consultation Document. The Council's Topic Paper 16 provided a review of the GTAA and used the July 2011 caravan count as evidence of current need. The Council considered that this Topic Paper represented an up to date statement of the need for traveller pitches in Wiltshire as of December 2011.
122. During the Examination a number of issues have been raised in relation to the Council's justification for Core Policy 47 and the content of Topic Paper 16. In particular and with regards to the latter, concerns have been raised at the

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<sup>66</sup> See Topic Paper 16 p17 - 'Preparing RSS Reviews on Gypsies and Travellers by Regional Planning Bodies' and 'Gypsy and Traveller Accommodation Needs Assessments: Guidance'

validity of the figures contained in Table 6. These concerns would appear to have some validity in as much as overcrowding on local authority sites and unauthorised developments/ encampments may have been underestimated with the consequent effect that there may be an additional need for pitches that exceeds the Council's figure of 88 (2011-2016). With regards to supply, the Council appears to countenance 10 pitches (Cricklade) which have unresolved issues of deliverability whilst a further 6 may have limitations as to their occupation (eg family members only). The evidence is not conclusive on these matters but leads to a concern that the potential supply of additional pitches (2011-2016) is overestimated. The net effect is that there is a degree of substantive doubt as to whether the figures within Topic Paper 16 justified robustly the pitch requirements within Core Policy 47. The data contained and presented in the caravan count for 2013<sup>67</sup> does not aid clarity on this point.

123. With regard to the PPTS (para 9) the submitted CS does not identify a supply of specific deliverable sites for the next 5 years nor does it identify a supply of specific developable sites or broad locations for growth for the remainder of the plan period. Consistency with this aspect of national policy is not achieved.
124. The justification for the pitch requirements of Core Policy 47, as originally submitted, is weak. Given the content and subsequent analysis of the GTAA, a more robust approach for the purposes of informing the CS, may have been to pursue Alternative Option 4<sup>68</sup> to recalculate local need. It may be considered unsatisfactory that the Council chose to merely undertake a limited review of a document which contained previously acknowledged flaws.
125. Indeed, Topic Paper 16 acknowledges that the data relating to the needs of Travelling Showpeople is limited and not robust enough to extrapolate beyond 2011. The 5 plots identified within Core Policy 47 appear to have been derived from the draft RS which were required in the period to 2011 but not delivered. At best this figure is that of an historic identified need; rolling it forwards is a simplistic approach which does not incorporate robust evidence of current or forecast needs for the immediate plan period. The CS is not justified in such regards.
126. Whilst the Topic Paper appropriately discounts the option of not making provision for transit sites, the subsequent CS approach is undermined by the absence of clear and substantive evidence. As Topic Paper 16 indicates: *"Given the lack of consistent records the range indicated in Table 11 of between 17 ... and 35 ... unauthorised encampments may in reality be much higher than that recorded."* The figure of 25 (2011-2016) is consequently not particularly well founded and is itself inconsistent with Core Policy 47 which seeks 25 between 2011 and 2021.
127. Following the Hearings, the Council has usefully reviewed its position, responded to the above matters, produced an Addendum to Topic Paper 16 and proposed further changes to Core Policy 47<sup>69</sup>. Such changes indicate a clear and positive intention to make appropriate provision for gypsy and traveller pitches over a requisite time scale, including an increase in provision

<sup>67</sup> STU/225

<sup>68</sup> Topic Paper 16 p17

<sup>69</sup> EXAM/87 and 90

to 2021. The Council's changes and revised LDS make clear that a full GTAA will be undertaken to inform a swift review of CP47 as part of a Gypsy and Traveller DPD and this will entail work with neighbouring authorities as necessary. This will enable the Council to consider any alterations that may emerge in relation to national policy<sup>70</sup>. Furthermore, the Council's proposed changes to the text to CP47 clearly indicate a positive approach towards providing pitches for gypsy, travellers and travelling showpeople albeit recognising that, until the intended DPD is complete, there will be no 5 year supply of deliverable sites.

128. Until such time as the intended DPD is complete and to ensure flexibility, the pitch requirements are best considered as minimums. This would be prudent and would introduce flexibility within the plan which would aid the effectiveness of its delivery.

129. As submitted, the CS approach towards gypsies, travellers and showpeople is not consistent with national policy and is not justified by the evidence base. As proposed to be changed, the CS would be framed positively towards securing consistency with national policy. With due regard to the changes, the revised LDS, the intended DPD and a commitment to a full GTAA, I am minded to find that the shortcomings of the CS would not be so severe when considered as a whole as to warrant a finding of unsoundness. I recommend modifications to the plan accordingly (**MM17**).

#### Summary

130. Subject to the recommended main modifications, the Core Strategy's approach to housing provision is sufficiently justified and is, when considered as a whole and with regard to the additional work programmed within the LDS, sufficiently consistent with national planning policy. With particular regard to deliverability, the modified Core Strategy takes a sufficiently positive approach and will be effective in meeting the varied housing needs of the county over the plan period.

#### **Matter 5 – Resilient Communities (Policies CP2, CP48 & 49)**

##### ***Does the Plan take a balanced and justified approach to the rural communities of Wiltshire? Will the Plan be effective in securing its objectives?***

131. The CS recognises clearly the large and diverse nature of Wiltshire. In doing so and with regard to Strategic Objective 4 and Core Policy 2, the CS seeks to plan for what it terms 'resilient communities' throughout the county.

132. Core Policy 48 aims to support rural life and its approach is supported by the evidence found within Topic Papers 4, 7, 14, the Joint Strategic Needs Survey<sup>71</sup> and elsewhere. Subject to my main modification (**MM18**) which is based on that suggested by the Council and has had regard to consultation responses received, Core Policy 48 takes a justified approach to dwellings in

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<sup>70</sup> Consultation: planning and travellers DCLG Sept 2014

<sup>71</sup> STU/213



rural areas, access to services, improvements to infrastructure, the conversion of rural buildings and community ownership. The modified policy will be consistent with national policy, is informed by local experience and there is no substantive evidence to suggest it will not be effective in operation. Residential conversions would not be precluded where justified and I am satisfied that the Council's objective to focus in the first instance upon the economic re-use of rural buildings is justified and consistent with both the Framework<sup>72</sup> and the overarching aims of the CS itself, particularly Strategic Objective 4. For reasons of clarity and to be consistent with the Framework<sup>73</sup>, I have nevertheless deleted the use of the word 'redundant' as applicable to conversion proposals and amended, for reasons of clarity, how the criteria should be applied to individual schemes with due regard to national policy and viability.

133. The Council's evidence indicates a downwards trend in the availability of rural facilities and services across Wiltshire. Such evidence includes Topic Paper 14 and the Rural Facilities Survey which, whilst it became apparent during the Hearings was not fully accurate in all regards, is sufficiently informative and objectively collated so as to be adequately robust for the purposes of informing strategic policy. The Council wishes, using Core Policy 49 but with due regard to other policies of the plan, to protect where appropriate those rural services and facilities which remain. To do so, the policy establishes a criterion based approach towards proposals involving the loss of a community service or facility. Whilst detailed, the criteria are clear thereby leading to their effective application. The policy will still support justified schemes that involve the loss of any relevant facility. I recommend the changes suggested by the Council to ensure the effectiveness of the policy in its implementation (MM19).
134. Overall, the CS does take a balanced and justified approach to the rural communities of the county and will be effective in operation.

## **Matter 6 – Climate Change (Policies CP41 & 42)**

***Does the CS promote an adequate and evidence based approach to climate change considerations that is consistent with national planning policy and will be effective in its implementation?***

135. The Council's position statement<sup>74</sup> sets out the primary evidence sources which inform the content of the CS. These include Topic Paper 1, its Addendum and STU/51 together with the SA which assessed adequately reasonable alternatives to the content of the CS itself. The CS seeks to make a positive contribution towards tackling climate change through a number of different policy areas which include the settlement strategy. Renewable energy sources are seen as a key contributory factor to meeting national targets for carbon emissions. The CS addresses explicitly the concepts of sustainable construction, low carbon energy and standalone renewable energy installations. I am mindful of national policy and guidance on these matters

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<sup>72</sup> The Framework para 55

<sup>73</sup> The Framework para 28

<sup>74</sup> WCS/PS/M6

and have considered the ministerial statements<sup>75</sup> made during the course of the Examination. A public opportunity to comment upon the implications of these considerations has been provided and responses have been taken into account.

136. Core Policy 41 has four distinct elements. Firstly, it sets a strategic basis for ensuring the adaptability of developments to climate change which is warranted by the underpinning evidence. The Council has proposed changes to the policy and its supporting text. It is intended that these will link to detailed design guidance to be produced in due course as a Supplementary Planning Document (SPD). This approach is both logical and reasonable. The SPD will provide a means to develop appropriate guidance on a range of matters including water consumption which is an issue also addressed through the application of Building Regulations and via the Code for Sustainable Homes. I recommend the proposed changes as main modifications for reasons of clarity and effectiveness **(MM20)**.
137. Secondly, the policy addresses the notion of sustainable construction. Once again the Council has proposed changes to the policy to reflect the passage of time and to clarify that the Code for Sustainable Homes Level 4 will need to be secured for new homes and BREEAM<sup>76</sup> 'Very Good' standards in other circumstances. I am satisfied that the evidence base, particularly Topic Paper 1, establishes a sound basis for local policy to supplement national aspirations with regard to sustainable construction.
138. With due regard to STU/51, the approach of Core Policy 41 provides a positive strategic lead. However, the evidence indicates that mixed forms of 40% affordable housing in addition to the achievement of Code Level 4 and above is not readily viable. Nonetheless, on the basis of more up-to-date evidence<sup>77</sup> pertaining to affordable housing targets and the reasonable potential for costs associated with delivering higher code levels to decrease in relative terms over time, there would consequently be adequate flexibility in the CS for Code Level 4 and above to be secured. There is insufficient substantive evidence that such requirements are therefore unreasonable and will stymie development coming forwards over the plan period. Indeed, the CS is clear that viability of development will be a material consideration in the consideration of schemes. I recommend the Council's changes as main modifications **(MM20)**.
139. The third element of Core Policy 41 takes an encouraging and justified stance towards the retro fitting of measures to improve the energy performance of existing buildings.
140. The fourth part of the policy addresses renewable and low carbon energy whereby proponents of major development proposals are required to submit a Sustainable Energy Strategy to support any planning application addressing, specifically, how the scheme would address principles of low carbon energy consumption. There is insufficient evidence to indicate that such an approach is contrary to the Framework (para 98). The Council's changes, which I recommend for reasons of effectiveness as main modifications **(MM20)**, result in the appropriate deletion of the 500 home threshold for zero carbon

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<sup>75</sup> EXAM/59, 60 and 61

<sup>76</sup> Building Research Establishment Environmental Assessment Methodology

<sup>77</sup> EXAM/85

standards to be met. Each site will be considered on its individual merits within the context of national standards, the CS objectives and information sources such as the Wiltshire Sustainable Energy Planning Study<sup>78</sup>.

141. I acknowledge that it is the intention of the government to simplify the way in which housing standards are applied and that this may lead to the consolidation of many of the Code for Sustainable Homes Standards into the Building Regulations<sup>79</sup>. Until such time as this is enacted, the modifications to Core Policy 41 will ensure the CS takes a robust approach towards sustainable construction and low carbon energy. Thereafter, the matter may be reassessed for consistency with national policy through the planned early review of the CS.
142. Core Policy 42 sets out a criterion based approach towards standalone renewable energy installations. In its evolution, the policy has been informed by a variety of evidence sources, including the Wiltshire Sustainable Energy Planning Study which identified the role of a mix of technologies in the effective delivery of renewable energy wherein the potential of wind energy throughout the county was, relative to other technologies, considerable. Indeed, Topic Paper 1 is clear that "... a positive policy supporting large scale standalone renewable energy in Wiltshire is needed ..." (para 4.4.26). The submitted CS was accompanied by a schedule of proposed changes to the plan that required post submission public consultation; the outcome has been taken into account.
143. Wind energy and the use of turbines is a sensitive national issue. The government recognises that appropriately sited onshore wind, as a cost effective and proven renewable energy technology, has an important part to play in the country's national energy policy. In this context, the government wishes to deliver balanced development as required by the Framework by ensuring the local environment is properly considered through a locally led planning system. Local plan policies should ensure that adverse impacts from 'wind farms' are capable of being addressed satisfactorily.
144. The 'Planning practice guidance for renewable and low carbon energy' was published after submission of the CS for Examination. This was subsequently superseded by the PPG. With regard to this background, the CS and its evidence base does not identify specific suitable areas within the county where renewable energy technologies could be employed. Nonetheless, the criteria approach of Core Policy 42 is positively expressed. The criteria are reasonable and appropriate, being capable of being applied to all forms of renewable energy generation throughout Wiltshire. Subject to a modification to the CS to acknowledge the need to consider the cumulative impacts (**MM21** and **MM22**) of developments, I am satisfied that Core Policy 42 provides a suitable policy framework for decision making, is not contrary to national guidance (para 14 onwards) and is justified adequately by the evidence base.
145. National guidance, published after the 'Wind Turbines (Minimum Distance from Residential Premises) Bill' failed to progress, is equally clear that local planning authorities should not rule out otherwise acceptable renewable

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<sup>78</sup> STU/179

<sup>79</sup> EXAM/106

energy developments through inflexible rules on buffer zones or separation distances. CS paragraph 6.38 (following the pre-submission changes) refers to the subsequent preparation of additional guidance to identify separation distances between wind turbines and residential premises in the interests of residential amenity and safety. Until such time as the guidance is produced, paragraph 6.38 stipulates a range of minimum distances that will be applied. However, whilst I have noted the level of interest into this subject from all quarters, there is insufficient evidence to justify the distances contained within the CS. The evidence which has been submitted is, at times, conflicting in terms of issues such as safety, noise and visual impact and I therefore turn to national guidance for the purposes of the assessment of Core Policy 42. The net effect of CS paragraph 6.38 would unduly restrict the scope for larger wind turbines to be located where justified in the majority of the county.

146. National guidance identifies that neighbourhood plans have a key role in delivering renewable energy developments and that community initiatives on such matters are likely to be increasingly important. Given the interest throughout Wiltshire in the neighbourhood planning process and the topic of renewable energy, there would seem to be considerable opportunity for local people to engage with, and influence, renewable energy principles at the local level. Nonetheless, in the context of national guidance and in light of the unconvincing evidence submitted in support of the pre-submission changes, the approach of the submitted CS is unjustified, not positively prepared, inconsistent with the aims of national policy and would be ineffective in operation. Whilst the Council made its changes to CS paragraph 6.38 upon submission, for the avoidance of doubt, I recommend modification of the CS to resolve this issue clearly (**MM22**).

147. Overall, the CS, as modified, does take an adequate and evidence based approach to climate change considerations that is consistent with national planning policy and will be effective in its implementation.

## **Matter 7 – Natural Environment (Policies CP50 – 56) and Water Resources (Matter 10 - Core Policies 67 and 68)**

***Does the Plan take a justified approach towards the Natural Environment that is based on adequate robust evidence and is consistent with national planning policy? Will it be effective in operation?***

148. The content of the CS with regard to aspects of the natural environment has been informed by a broad evidence base. As referenced within Topic Paper 5<sup>80</sup>, this includes an awareness of the international and national legal framework, an awareness of the national policy context, knowledge of the environmental assets of the county and its surrounds, the publication of the HRA (and addendums<sup>81</sup>), the SA and work with relevant partner organisations. I have been mindful of the various submissions that have been made in relation to the content of the CS before and during the course of the Examination.

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<sup>80</sup> TOP/8 Natural Environment

<sup>81</sup> EXAM/28, EXAM/58, EXAM/89, EXAM/89A

## Biodiversity and Geodiversity

149. The CS acknowledges the great value of Wiltshire's natural environment. It seeks to provide a framework for the protection and enhancement of the contributory ecological networks that maintain a healthy environment. Policy 50 sets out the intended approach towards biodiversity and geodiversity. Following discussions during the Examination, the Council has proposed significant changes to Core Policy 50 and its supporting text with the aim of ensuring its clarity and effectiveness.
150. The evidence within Topic Paper 5 and elsewhere indicates that the Council has sought to work appropriately with statutory and other partners. The outcomes of such work, which includes inputs from Natural England, are to be seen within the CS and with reference to initiatives such as the Wiltshire Bats SAC Planning Guidance and the River Avon SAC Planning Protocol. The evidence base appears adequately comprehensive in providing an understanding of the existing assets within the county, including those areas afforded specific international and national protection such as the SACs, SPAs and SSSIs. Indeed Natural England<sup>82</sup> raises no in principle objections to the approach taken by Core Policy 50 towards biodiversity and geodiversity within the county.
151. The CS aims to follow the 'mitigation hierarchy' with regard to new development and biodiversity issues. In essence the CS seeks to avoid impacts from development, if feasible, and then to mitigate or reduce them as far as possible before considering the potential compensation for any residual unavoidable effects. Such an approach is consistent with the Framework (para 118). The Council has demonstrated through its HRA and the work with partners how it intends to address the Natura 2000 sites within the country. The evidence does not lead me to find that the proposed approach is legally flawed, inflexible, unclear or will not be effective in implementation. The policy approach of the CS would not preclude 'biodiversity offsetting' albeit the evidence does not support a specific reference at this current time.
152. As acknowledged by the Environment Agency<sup>83</sup>, the CS, including the supporting text to Core Policy 50, makes adequate reference to the Water Framework Directive such that the plan will be effective in its implementation.
153. Subject to the changes proposed by the Council which I recommend for reasons of effectiveness (**MM23**), Core Policy 50 is justified by a robust evidence base and is consistent with national policy.

## Landscape

154. Core Policy 51 seeks to protect, conserve and enhance Wiltshire's distinctive landscape character through a criterion led approach to development proposals. Such an approach is consistent with the principles of the Framework. Underpinning the Council's approach to landscape issues are the various Landscape Character Assessments (LCA) that cover the county. This approach is warranted given the scale and varied landscape nature of Wiltshire. Invariably there is scope for more detailed assessments of

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<sup>82</sup> WCS/SoCG/05

<sup>83</sup> WCS/SoCG/04

landscape to be undertaken but the underlying evidence for Core Policy 51 is proportionate and acceptable. Despite concerns raised at the potentially generic nature of the criteria within Core Policy 51, the wording is sufficiently encompassing to ensure that landscape considerations are assessed adequately where necessary. I have recommended the Council's proposed changes to Core Policy 51 which will resolve a potential tension in the submitted CS in relation to the mitigation of harmful impacts arising from development (**MM3**).

155. The county contains a number of sensitive landscapes including three designated AONBs and a small part of the New Forest National Park. Once again, concerns have been raised that the CS and its evidence base fails to differentiate adequately between such nationally designated landscapes and the remainder of the county. I have noted the Statement of Common Ground (and addendum) between the Council and Natural England<sup>84</sup> in relation to Core Policy 51. The Council has a clear commitment to establish a Landscape Strategy for Wiltshire by 2015; in the interim and for the strategic purposes of Core Policy 51, I am satisfied that the LCA approach taken by the Council provides an adequately robust basis for considering landscape issues. Indeed, within its evidence the Council does refer to the various management plans for each AONB and the National Park and a commitment to positive partnership work. I am particularly mindful of the Council's suggested changes to the plan which provide more appropriate emphasis to the statutory purposes of each area thereby ensuring consistency with national policy. I have recommended such modifications accordingly (**MM3**).
156. Detailed concerns have been raised in relation to the potential for new development within nationally designated areas. With the exception of Marlborough and Warminster (discussed further below within each Community Area), the CS identifies no strategic allocations within or particularly close to such areas and I am satisfied that Core Policy 51, when applied in conjunction with the remainder of the plan, will provide an effective means of assessing landscape impacts and protecting, conserving and potentially enhancing landscape character across the county and within protected landscapes. The Council's SHLAA is not intended to indicate that all potential sites identified in any protected landscape will be acceptable for development and it should not be read as such. The balance of evidence, with particular regard to the development of previously developed land, existing settlements and the role of the neighbourhood planning process, suggests that there may be sufficient scope to accommodate potential non-strategic development without the use of greenfield sites that would be likely to harm any protected landscape.
157. The Council has concluded that there is no current basis for any new local landscape protection or designations. The intended Landscape Strategy will provide a suitable opportunity to review their necessity. On the basis of the available evidence, I accept that the retention of existing Special Landscape Areas are warranted on an interim basis albeit their thorough review should form part of the Landscape Strategy in due course. Future expansion of national designated areas may be feasible, eg Cranbourne Chase and West Wiltshire Downs AONB in the vicinity of the Wellhead Valley, but should be dealt with through the appropriate mechanisms which is not this current

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<sup>84</sup> WCS/SoCG/05 and 05A

Examination.

158. The CS clarifies that the approach to be taken towards Green Belt and development proposals will be in accordance with national policy and I have no reason to consider any alternative approach is warranted.

### **Green Infrastructure**

159. Core Policy 52 provides a positive framework for the retention and reinforcement of the Green Infrastructure (GI) network of Wiltshire. It is informed by a range of evidence sources, notably Topic Paper 11<sup>85</sup> and which includes the outcomes of the Council's partnership working with appropriate agencies and interested bodies. There is a sufficient assessment of the GI that currently exists within the county. This provides a reasonable baseline against which the future performance of the policy may be assessed.

160. The Council have provided clarification through a proposed change to the CS and its glossary in order that the meaning of GI is readily understood, this is useful although not strictly essential for soundness. The Council is progressing the adoption of its separate GI Strategy in a relatively timely fashion which is referenced adequately by the CS and will be important in supplementing the strategic intentions of the plan.

161. The Council has proposed changes to the CS in order to clarify that the operational Wiltshire Open Space Standards, based on the former District areas, will continue to apply until such time as comprehensive new standards are assessed in the course of the intended CS Partial Review (March 2016). Such standards are not universally based on particularly up-to-date information albeit the Council has undertaken a partial review of the existing arrangements and incorporated benchmarking against, for example, the standards and best practice of other authorities. However, and with due regard to the terms of the Framework (para 73), I have no substantive evidence to suggest that such an interim arrangement would be unreasonable nor that the approach provides anything other than a pragmatic solution towards open space provision. On the balance of the available information, the content of the CS is based on proportionate evidence for the short term intended. For reasons of effectiveness, I recommend the Council's change to the CS text to clarify the commitment to review open space (**MM24**).

162. The policy requires an audit of GI where major development is proposed which supports the strategic aims of the Council in this area; I have no substantive evidence that such a requirement would impose an unreasonable burden upon development viability so as not to be justified. With due regard to the Council's position statement (para 16), there is insufficient evidence to support the inclusion of Rural Buffer Zones within the CS as previously contained in the North Wiltshire Local Plan.

### **Canals and Cotswold Water Park**

163. Wiltshire has a rich history related to its canal network which is summarised in Topic Paper 11. Core Policy 53 provides a positive framework for the restoration and improvement of relevant canals whilst acknowledging

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<sup>85</sup> TOP/17 Green Infrastructure

adequately their cultural and historic functions as part of the broader landscape and the local environment. The Council has proposed a change to the title of the policy to clarify that it applies to all relevant waterways, including the Kennet and Avon Canal. This is necessary for the purposes of an effective plan (**MM25**). The saved policies referenced in CS paragraph 6.98 will ensure that the development plan provides an adequate policy basis for decision making on schemes that affect the canal network until such time as a necessary revised strategic policy relevant to the Kennet and Avon Canal, based upon contemporary evidence, is derived as part of the CS Partial Review.

164. The Council has proposed changes to the policy and its supporting text which refer to the role of the canals as part of the sustainable transport network and to the important role of the Canals and Rivers Trust. These are useful but not essential for the overall soundness of the plan.
165. The cross boundary importance of the Cotswold Water Park is recognised suitably by the CS and Core Policy 54. The evidence, including Topic Paper 11 and the Park's Strategic Review and Implementation Plan<sup>86</sup>, indicates that the duty to cooperate has been discharged adequately and there is no substantive indication that the policy is neither justified nor effective.

### **Air Quality and Contaminated Land**

166. The Council recognises its statutory duties in relation to air quality. Despite the proportionately good air quality experienced across the whole county, the Council is fully aware of the purpose of its Air Quality Management Areas (AQMAs). The evidence suggests that the Council is addressing issues of air quality on a number of levels which include its Air Quality Strategy, an emerging Air Quality SPD, Developer Guides and a broader Air Quality Action Plan which is intended to contain specific action plans to address the issues faced by the AQMAs. As part of its overall approach, Core Policy 55 specifically provides a basis for considering the implications of development proposals which may, for various potential reasons, exacerbate existing air quality issues.
167. Participants to the Examination have expressed concerns that the strategy of the CS, particularly towards growth and the settlement hierarchy that may increase traffic and thereby pollution, will fail to satisfactorily address air quality issues. However, the evidence indicates that the Council is addressing the issue through a cross-organisation approach. The SA supports the specific need for Core Policy 55 and whilst I recognise the concerns raised at how development locations in key areas might exacerbate air quality problems, I also note the amended wording of the Council which emphasises the role of the Air Quality Strategy and the intended Air Quality Action Plan. Core Policy 55 provides a positive framework for tackling as necessary the issue of air quality that may be relevant to development proposals. This is derived from an adequate evidence base which, as part of the Council's strategic approach, will be effective and consistent with the Framework (para 124) subject to my modification derived from the Council's suggestion (**MM26**).

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<sup>86</sup> CPP/105-107



168. Core Policy 56 addresses the issue of contaminated land and draws upon the Council's Inspection Strategy for Contaminated Land<sup>87</sup>. The policy has sufficient flexibility within it to ensure that it can be applied on a proportionate basis thereby providing an effective means to address site specific instances of contamination that is consistent with the objectives of the Framework.

#### **Water Resources** (discussed as part of Matter 10)

169. The CS is supported by evidence pertaining to flood risk, particularly the Strategic Flood Risk Assessment, the SA and the manner in which the strategic allocations have been assessed. The Environment Agency raises no objection in principle to the approach of the CS towards flood risk or towards Core Policy 67. The CS is consistent with national policy and the evidence, with due regard to the targets and indicators contained in the Monitoring Framework which include reference to Sustainable Urban Drainage, suggests the policy will be effective in operation.

170. The issue of water resources within Wiltshire is addressed by the CS and specifically Core Policy 68. The Council has drawn upon a range of evidence sources which include its SA, its HRA, its engagement with infrastructure providers and the EA. Given that the CS extends to 2026, the consequent limitations of specific evidence relating to water supply and drainage over that period and the generally strategic nature of the plan itself, there is inevitably some scope for refining both the evidence and its analysis, particularly in the latter part of the plan period. I have no reason to consider that the Council will not continue to discharge its Duty to Cooperate accordingly and I am satisfied that the evidence and the CS address adequately matters such as Water Protection Zones, the Water Framework Directive and River Basin Management Plans. Changes have been proposed to clarify the policy and its approach toward groundwater quality which I recommend as main modifications to ensure an effective plan (**MM27**).

171. Notwithstanding concerns that have been raised, there is no substantive evidence to indicate that the CS is not based on adequate proportionate evidence or that its objectives are not capable of being met during the course of the plan period. The Infrastructure Delivery Plan<sup>88</sup> (IDP) is an iterative document which is capable of effective review should any salient matter change, for example the investment and delivery plans of infrastructure providers. The CS provides an adequately robust basis for addressing matters relating to water resources and new development.

172. Core Policy 69 seeks to provide specific protection to the River Avon SAC and is a response to the available evidence which indicates the potential effects that new development can have upon riparian habitats and water quality. The evidence, including STA/01 and EXAM/42<sup>89</sup>, indicates that a partnership approach, including the Environment Agency and Natural England, is seeking to tackle identified issues affecting the SAC appropriately. The Council has proposed changes to clarify the wording of the policy which I recommend for reasons of effectiveness and legal compliance (**MM27**). Whilst the CS refers to

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<sup>87</sup> CPP/116

<sup>88</sup> STU/41

<sup>89</sup> Nutrient Management in the Hampshire Avon Catchment, letter of intent by EA and NE and Note to the Inspector Regarding Phosphates and the River Avon SAC

the potential need for financial contributions arising from new development to help implement a longer term Nutrient Management Plan, there is considerable flexibility within the CS on this point and, as such, no substantive evidence that the approach is unjustified or would prejudice overall development viability. The River Kennet, while of value, is not a SAC and is offered protection by other elements of the CS, for example the Marlborough Area Strategy and via Core Policy 50. A reference within Core Policy 69 is not warranted.

## Summary

173. Subject to the modifications indicated, the CS does take a justified approach towards the Natural Environment that is based on adequate robust evidence and is consistent with national planning policy. There is no substantive evidence to indicate that the CS will not be effective in such regards.

## **Matter 8 – Built Environment (Policies CP57 – 59)**

### ***Does the Plan take a suitably evidence based approach towards the built environment? Is the Plan consistent with national policy in such regards?***

174. The Framework makes clear that good design is a key aspect of sustainable development. The Council's Topic Paper 9 clarifies that the Council aims to ensure that new development throughout Wiltshire is of a good design standard and, where appropriate, that it maintains local identity whilst respecting important townscape and landscape settings through the sensitive design and appearance of new development.
175. Core Policy 57 'Ensuring high quality design and place shaping' draws on a reasonably comprehensive and broad evidence base that includes evolving national policy and documents such as the Urban Design Compendium, the Manual for Streets and the 2009 publication 'Planning for places - delivering good design through core strategies'<sup>90</sup>.
176. Core Policy 57 takes a detailed criterion led approach to design matters. Whilst this is a lengthy and potentially rather prescriptive approach, it will provide a solid basis for securing good design and there is no substantive reason why such level of detail should not form part of the CS at this time. A variety of matters are addressed by each criterion which will need to be assessed on a proportionate basis in the application of the policy. The issue of local distinctiveness and landscape character can be addressed adequately through the submitted approach notwithstanding the limited baseline evidence pertaining to characterisation. Subject to the changes proposed by the Council which I recommend for reasons of effectiveness and consistency with national policy, the Policy will not preclude the potential use of innovative approaches towards new development and will ensure safety is an identified factor in the design process (**MM28**). The Council's other suggested changes have merit but are not necessary to secure soundness.
177. With regard to the historic environment, the CS is underpinned by an awareness of the range of assets which exist within the county and has been

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<sup>90</sup> Commission for Architecture and the Built Environment (now Design Council)

informed by evidence which includes the Historic Landscape Assessment<sup>91</sup>, the Salisbury Historic Environment Assessment<sup>92</sup> and positive engagement with English Heritage. Indeed, I note the content of the Statement of Common Ground (amended) between the Council and English Heritage which has led in part to a range of proposed changes to the CS which include the use of accurate nomenclature and reference to existing and proposed supporting documents. I recommend many of these changes for reasons of effectiveness and consistency with national policy (**MM29**). On this basis, Core Policy 58 is justified adequately, consistent with national policy and will be effective.

178. Core Policy 59 is entitled 'The Stonehenge, Avebury and Associated Sites World Heritage Site and its setting'. In the development of both the policy and its supporting text the CS has been informed by a range of evidence sources which are detailed in part within Topic Paper 9; these include the relevant Management Plans and the Stonehenge Statement of Significance. Constructive dialogue between the Council and interested parties, including the Avebury Society and the CPRE<sup>93</sup>, during the course of the Examination has led to a number of proposed changes to the CS which are designed to provide accuracy of terminology and clarity of intent. Such changes are necessary to ensure the effectiveness of the CS and its overall consistency with national policy. I recommend them as main modifications accordingly (**MM30**).
179. Overall, the CS does take a suitably proportionate evidence based approach towards the built environment that is consistent with national policy.

## **Matter 9 – Community Areas**

***Does the CS take a robust approach to the identified community areas of Wiltshire and key settlements? Is the approach consistent with national policy and will the objectives of the plan be capable of effective delivery?***

### **Amesbury Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Amesbury Community Area and will it be effective in terms of delivery?**

180. The Amesbury Community Area is focussed upon the market town of Amesbury (including Bulford and Durrington) which lies north of Salisbury. I am mindful that the South Wiltshire CS was adopted in 2012 and is currently applicable to this locality. The Council acknowledges that the approach to Amesbury Community Area is derived from the South Wiltshire CS but, following review, is an approach that remains consistent with both the available evidence and the underlying objectives of the Wiltshire CS. I have no substantive reason to disagree.
181. Core Policy 4 identifies the settlement hierarchy for the community area which is justified adequately by the Council's evidence and its analysis of the role

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<sup>91</sup> STU/52

<sup>92</sup> STU/196

<sup>93</sup> Campaign to Protect Rural England

and function of settlements. As submitted, the policy indicated that at least 2,395 homes were to be provided over the plan period, a significant proportion of which would be located at Amesbury including some 1,300 in a strategic allocation at Kings Gate. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed an indicative amount of housing for this, and other, Community Areas. Consequently, the level of indicative housing contained in Core Policy 4 is proposed to be 2785 homes, of which some 2440 would be at Amesbury, Bulford and Durrington and 345 in the remainder of the Community Area. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly (**MM 31**).

182. The strategic allocation is detailed within Appendix A whereby a range of salient matters, including infrastructure provision, are considered adequately. There is insufficient evidence to indicate that the proximity of the military airfield is a constraint that would jeopardise development coming forwards and the balance of the evidence indicates that the site is viable and deliverable. There is no substantive evidence to suggest any alternative approach would be justified reasonably.
183. Non-strategic housing is intended to be delivered throughout the community area wherein neighbourhood planning is envisaged to be a key delivery factor. As indicated by EXAM/29B, there is a limited degree of engagement at present and consequently the Council will need to monitor with care the rate at which any community planning process can facilitate the levels of development envisaged by the CS outside of Amesbury. The identification of specific housing sites by the Council in its forthcoming Sites DPD as an adjunct to the neighbourhood planning process may be necessary to ensure a specific supply of housing land to meet identified needs.
184. The supporting text to Core Policy 4, particularly paragraph 5.19, sets out a range of matters that may need to be addressed by specific development proposals within the community area. These include retail matters, heritage interests, landscape and biodiversity considerations and transportation issues which include the role of the A303 and connectivity with and through Amesbury town centre. All referenced matters have a basis in evidence, including the community strategy and aspects of the Amesbury Community Strategic Plan, which result in a justified and positive basis for planning until 2026. To ensure the suitable acknowledgement of the AONB, I recommend additional text as a main modification accordingly (MM31).
185. With regards to employment land, Amesbury and its location close to the A303 continues to be the focus for development. Core Policy 4 establishes 17ha of new employment land for the community area. Such a figure is derived reasonably from the work underpinning the South Wiltshire CS and with regard to currently extant policies. It will complement the five identified Principal Employment Areas. There is no substantive evidence to indicate any alternative approach is warranted.
186. Core Policy 5 set out a positive approach towards further suitable development at the established campus of Porton Down. The Council and the Policy acknowledges the wildlife and biodiversity issues arising from the location of

the site, particularly with regards to the chalk grassland habitat and stone curlew population. I note the ongoing work between the Council and its partners with regard to the Integrated Business and Environmental Management Strategy which seeks to avoid the potentially adverse effects of future development upon the Natura 2000 sites. Natural England maintain no objection to the policy and, subject to the changes proposed by the Council which are necessary for reasons of legal compliance and effectiveness, I have no substantive basis upon which to disagree. I recommend the Council's changes as main modifications accordingly (**MM32**).

187. Core Policy 6 relates specifically to Stonehenge and must be considered in conjunction with the remainder of the CS, particularly Core Policy 59. The Council aims to protect and sustain the outstanding universal value of this World Heritage Site and its setting and, subject to the clarification of the policy for reasons of effectiveness, I have no reason to consider the approach taken to be unjustified (**MM33**).
188. With due regard to the consideration of alternatives, the CS does take a justified approach towards the Amesbury Community Area and will be effective in its delivery.

### **Bradford on Avon Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Bradford on Avon Community Area and will it be effective in terms of delivery?**

189. The Bradford on Avon Community Area is situated between Trowbridge and Bath on the western fringe of the county. The area is centred upon the historic market town of Bradford on Avon itself, which serves a mix of large and small villages as identified robustly through the Council's analysis of the role and functions of settlements. Much of the area is influenced by the Western Wiltshire Greenbelt and the Cotswolds AONB and I recommend a modification to clarify the role of the latter within the CS (**MM34**).
190. The Council has identified, for reasons which include its location, that the town experiences relatively high levels of out commuting. The CS contains a consequent objective of increasing the degree of self-containment within the town through the modest provision of employment opportunities. Consequently, Core Policy 7 provides support for two Principal Employment Areas and indicates that 2 to 3 ha of employment land will be provided on land at Kingston Farm.
191. The approach to employment land is set out by the Council's evidence, particularly the Employment Land Review and Topic Paper 7 which latterly identifies the landscape, green belt and transport considerations that justify adequately the employment land provision for the town. Given the proximity of the town to Trowbridge, with its capacity for growth, I am satisfied that the Council's approach is robust albeit capable of ready review through the 'plan, monitor, manage' process. The expression of requirements in terms of land rather than floorspace is not unreasonable and is consistent both with the evidence base and the CS when read as a whole.
192. It would appear that the employment land allocated will facilitate the

consolidation of an existing business but that in itself does not invalidate the approach of the CS for the town. As indicated by Topic Paper 7, additional employment land is anticipated to be required for the wider community area and, subject to monitoring, there is no substantive evidence to indicate that the neighbourhood planning process would not be capable of ensuring such land is identified as necessary.

193. The Council's housing evidence suggests that the capacity for growth in Bradford on Avon is limited by a range of factors which feasibly limit development towards the eastern fringe of the town. The Council has concluded that the strategic allocation at Kingston Farm for 150 dwellings, as part of a mixed use scheme, is the most appropriate when compared to alternatives. A range of evidence, including the SA, the Strategic Sites Background Paper and Topic Paper 12 indicates how the submitted option of Kingston Farm was derived. This evidence, particularly the SA, clarifies that the 'golf course option' would have a number of negative impacts and was not a suitable alternative to be pursued. Whilst I note the submissions made which seek to clarify the effects of a scheme involving land at the golf course, such details are not particularly well developed and do not lead me to disagree with the Council's submitted position. The Sites DPD will provide a suitable opportunity for the Council to consider further the housing land supply for this community area.
194. For reasons set out in its analysis, the SA does not make a clear recommendation between the identified sites at Kingston Farm and nearby land to the north of Holt Road. In terms of the sustainability objectives, the land to the north of Holt Road shares some similarities with that of Kingston Farm, particularly in terms of transport infrastructure and connectivity to the town centre albeit that Kingston Farm is marginally closer. Development on either area of land would have landscape impacts and would potentially affect heritage assets of significance (archaeology and Conservation Areas) although English Heritage raise no objection in principle<sup>94</sup> to Core Policy 7. There is a degree of uncertainty as to the extent to which development upon either site would be affected by habitat considerations, especially bats albeit that the Council's HRA and suggested changes (Core Policy 50 and reference to the Bats SAC Guidance) provide an acknowledgement of the issue and a means to avoid adverse effects on the integrity of the SAC. Ultimately, there is no substantive evidence to clearly indicate that an alternative to the submitted strategic allocation, including an additional smaller housing allocation on land to the north of Holt Road, should have been reasonably identified. Consequently the approach taken by the Council is, on balance, justified adequately and will be effective.
195. The details of the Kingston Farm strategic allocation are shown upon the development template at CS Appendix A. Whilst aware that such details are not designed to be rigidly prescriptive and that a masterplanning exercise will be required, the content of the template appears justified adequately by the available evidence which includes the Statement of Common Ground between the Council and developer interests. The template references a range of key matters which include transport, access, drainage, ecology, landscape, health care and education, thus providing a satisfactory means of ensuring a well-

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<sup>94</sup> WCS/SoCG/01

planned and cohesive development. I have no substantive evidence to suggest such an approach is not robust. Concerns have been expressed at the removal of an original Council intention to phase development at Bradford on Avon towards the end of the plan period; however, there is no convincing evidence to indicate that the strategic allocation should be deferred provided the requirements of the CS are satisfied and the matters referenced in the development template, for example transport infrastructure, are resolved adequately.

196. The submitted CS expressed its housing figures as minimums. The Council has subsequently proposed an indicative figure for the town and Community Area that shows approximately 595 homes to be provided in the town. The balance of the evidence supports the strategic allocation as shown within the CS and this would not preclude other sites coming forward as justified in accordance with Core Policy 2 or through subsequent plans of the Council, such as the Sites DPD. The balance of the available evidence supports the revised volume of housing which I have no reason to consider will not be capable of effective delivery over the life of the plan.
197. As referenced above, the Council's HRA acknowledges the location of the Bath and Bradford on Avon Bats SAC and is alert to the need to maintain the integrity of all Natura 2000 sites. The HRA considers the effect of the CS and, where appropriate, Core Policy 7 upon such sites albeit at a broad strategic level beneath which further detailed assessment will need to be undertaken to ensure compliance with Core Policy 50 (as modified). The balance of available evidence does not indicate that Core Policy 7 could not be implemented at this time.
198. As submitted, Core Policy 7 indicated that there were 160 homes to be provided in the remainder of the Community Area over the plan period. This is a relatively low figure in the context of the objectively assessed needs of the county as a whole. However, the Council has suggested the figure be revised to 185. The CS will be subject to subsequent review and that, complementary to any emerging neighbourhood planning process, the Sites DPD will be a suitable vehicle to review and detail the housing land supply for the locality. Such an arrangement is justified and I recommend accordingly (**MM 34**).
199. Holt is designated appropriately as a Large Village based on its size, function and facilities. The Holt Area of Opportunity (land at the Midcands) is identified via saved policy C41 of the West Wiltshire Local Plan (1<sup>st</sup> Alteration) which enables proposals for the redevelopment and/or rehabilitation of the land for light industrial use, workshops, offices and residential purposes. The extant Local Plan identifies the land as having an industrial characteristic with a range of buildings suitable for mix of uses albeit with a need to address potential land contamination. Some development has occurred within the area and I have received confirmation of recent permissions which have been granted<sup>95</sup>.
200. The Council does not consider that the potential for development at Holt, including the Area of Opportunity, is strategic. It therefore relies on Core Policies 1 and 2 to govern the location of new development in large villages.

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<sup>95</sup> Wilts Council decision refs: W/13/1080/FUL; 1081/CAC; 1082/FUL

Consequently, development which would effectively extend the Area of Opportunity outside of the defined Holt settlement boundary would only be permitted where it derives from a community led planning process or subsequent plan, such as the Sites Allocation DPD. Submissions have been made to the Examination which identify a consortium approach to developing an area of land which includes the Area of Opportunity in two phases. Such development, for cited reasons which include viability and village parking provision, would extend beyond both the Area of Opportunity and the settlement boundary.

201. The settlement boundary has been carried forwards from the extant Local Plan and, as referenced earlier in this report, has not been reviewed for the purposes of the CS; this weakens its veracity as a robust defined boundary. The neighbourhood planning process for Holt is at an early stage, albeit I note the views of the Parish Council in relation to the Area of Opportunity and the consultation processes which have been undertaken by the development consortium in promulgating its intentions for the land in question. There is insufficient evidence to warrant modifying the defined settlement limits for Holt at this time or for the extension of the Area of Opportunity as has been suggested to the Examination. I recognise that the speed of the neighbourhood planning process for Holt does not meet the current aspirations of the developer consortium, but it is a process which can be complemented by either a review of the CS or the Sites DPD which will review all settlement limits across the county. Through such means the appropriateness or otherwise of the Holt Area of Opportunity and the mixed use development which is being promoted can be assessed with necessary public consultation. In the interim when assessing detailed proposals that may come forward, all material considerations will need to be considered and balanced with due regard to extant planning policy; an approach which would appear to have been undertaken in relation to recent proposals.

202. With due regard to the consideration of alternatives and the modifications recommended, the CS does take a justified approach towards the Bradford on Avon Community Area and will be effective in terms of delivery.

### **Chippenham Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Chippenham Community Area and will it be effective in terms of delivery?**

203. Core Policies 1 and 10 establish that the town of Chippenham is one of three Principal Settlements within Wiltshire. It is the urban focus of the Community Area. This designation is justified by a combination of factors that include its size, transport links, employment base and its range of services and functions. With regard to Chippenham, in common with the remainder of the county, the CS is informed by a range of evidence which includes key documents such as Topic Papers 3, 6, 7, 10 and 12 in addition to information provided by sources such as the Town Centre and Retail Study, the Workspace and Employment Land Review and the SA.

204. The Council aims to deliver significant job growth within the town to improve



its degree of self-containment and thus contribute to securing the aspirations set out in the community Chippenham Vision Statement. Such an approach is consistent with the sustainability aims of the CS as a whole and is supported by the thrust of the evidence base, including Topic Paper 7 and associated documents.

205. The CS draws adequately upon work that has been undertaken at the community level, for example the Chippenham and Villages Community Plan<sup>96</sup> and CS paragraph 5.48 references a range of specific issues that the CS will seek to influence and address. These reflect a range of matters many of which are drawn from community based discussions. The balance of evidence particularly that provided by the HRA but including submissions made in relation to individual sites indicates that the Council has considered adequately the effects of the plan upon Natura 2000 sites and other environmental constraints.

### **Core Policy 9**

206. Core Policy 9 relates to the Central Area of Opportunity and the CS references suitably both the saved content of the North Wiltshire Local Plan and the community/partnership approach to the Chippenham Central Area Masterplan that will provide a more detailed framework for the delivery of town centre development. The location and types of development anticipated over the plan period are adequately stated within the CS subject to the Council's proposed changes to paragraph 5.48 which, for reasons of clarity and effectiveness in relation to retail matters and flood risk, I recommend as a main modification (**MM35**).

207. The Central Area Masterplan will assist in developing further how site opportunities may be brought forward, for example the residual elements of the historic 'Flowers site' or, if justified, could extend to the issues affecting the Westinghouse Sports Ground. There is no necessity or evidence for detailed site considerations to form part of the CS at this time albeit noting that the Masterplan will not be capable of setting planning policy if brought forwards as a Supplementary Planning Document. The CS provides a suitable positive framework for town centre decision making that is justified adequately by the raft of available evidence which includes, for example, the Town Centre and Retail Study.

### **Core Policy 10**

208. Core Policy 10 provides the broader spatial strategy for the Chippenham Community Area. The evidence base justifies sufficiently the various Large and Small villages (subject to **MM36** which clarifies the designation of Grittleton) and the policy principles are consistent with the thrust of the CS as a whole.

209. As the second largest settlement in the county, Chippenham is identified within the CS as being capable of accommodating a notable degree of growth over the plan period. Given the role and function of the town in association with its transport links, the CS is justified adequately in this regard.

210. In essence, the submitted CS showed that the Chippenham locality would

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<sup>96</sup> CPP/121

accommodate at least 4,000 new homes and over 26ha of employment land. With regard to the overall levels of development, it is logical and consistent with the Framework that Chippenham is a focus for new development and growth. On this basis, it would appear that the town provides some notable scope for increased levels of development, especially housing and employment land, to meet the identified needs of the county.

211. I am mindful of the interest shown in the forward planning for both this Community Area and its affected neighbours. It is evident that the submitted approach has evolved over time, particularly from the Council's earlier Wiltshire 2026 evidence and the Consultation Document which identified a greater level of overall development for the community area, phased over the plan period. As submitted, the volume of housing was expressed as a minimum and there was consequently scope for an increase in provision to meet needs; indeed, the evidence suggests that there are sufficient sites potentially available to provide a greater amount of overall development. The volume of employment land is supported by the evidence base and, with regard to submissions made, I have no substantive reason to consider the figure either excessive or inadequate.
212. Subsequent to the Examination Hearings, the Council has proposed an increase in the overall housing provision for the county with which I agree and have recommended accordingly. This affects the strategy for Chippenham wherein, in addition to 26.5ha of employment land, approximately 5,090 new homes will be provided across the Community Area with at least 4,510 at Chippenham. The nomenclature of 'approximately' and 'at least' within the proposed revisions, with due regard to the addendum to Topic Paper 15<sup>97</sup>, provides sufficient clarity and flexibility for the effective implementation of the CS within Chippenham.
213. As submitted, Core Policy 10 indicates three strategic sites around the existing town: North Chippenham, Rawlings Green and South West Chippenham and it is intended that these would be brought forward through a master planning process and with due regard to the development templates shown in CS Appendix A. The strategic site selection process for Chippenham has been relatively complex. A voluminous body of evidence has been produced from a variety of sources including the Council, the community and from developer interests. I have had regard to its content. Topic Paper 12<sup>98</sup> reviews the Council's site selection process (Appendix 3). It acknowledges the evidence provided by the Strategic Transport Assessment<sup>99</sup>, that relating to infrastructure requirements, the input of the SA process and summarises the options and associated consultation undertaken. Ultimately, Topic Paper 12, albeit not exclusively, sets out the justification for the submitted content of Core Policy 10.
214. The SA forms a key part of the justification for the CS and it provides an iterative source of evidence as to how reasonable alternatives to the submitted CS content have been considered and discounted. With regards to Chippenham, the approach taken within the iterations of the SA is also

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<sup>97</sup> EXAM/84

<sup>98</sup> TOP/18 - Site Selection Process

<sup>99</sup> STU/105

voluminous and, it has been argued, not unduly clear. It is not aided by the way in which options have been identified, assessed, carried forward, amalgamated and introduced over time. Nonetheless, the various versions of the SA, including for example SUS/26 and EXAM/05, indicate the Council's approach to development in and around the town and have been subject to public consultation.

215. The Council initially assessed four options for strategic sites as part of its Wiltshire 2026 work leading to a preferred 'Option 1' for a mixed use urban extension to the north and east of the town (3650 dwellings). The Council amended its preferred approach within its subsequent consultation document, leading to a preferred approach which was maintained within submitted Core Policy 10. As part of this work a number of potential strategic sites were assessed. There is much useful evidence in the analysis which the Council has undertaken. In broad terms, the evidence supports a more dispersed approach to the siting of significant developments in and around Chippenham.
216. With regard to the content of submitted Core Policy 10, the intention to site 2.5ha of employment land and 750 dwellings (and associated infrastructure) at 'North Chippenham' appears rational. Whilst the concerns of some parts of the community are noted, the site is well related to the existing urban form of the town, appears capable of relatively early delivery, necessary transport infrastructure can realistically be delivered and, crucially, environmental constraints appear capable of being addressed adequately without unacceptable impacts upon existing interests, for example, Birds Marsh Wood.
217. Submitted Core Policy 10 also indicates that 18ha of employment land and 800 dwellings would be delivered on land at 'South West Chippenham'. The Council considers that this location offers scope for a sustainable urban extension to the town wherein the employment and housing benefits of its planned early (phased) development would outweigh the potential harm caused by an incursion into a greenfield location beyond the town and community area itself.
218. Concerns have been expressed at the nature of the south west proposal, particularly its location, its impact upon the landscape and smaller settlements to the south of Chippenham, its constituent parts, its proximity and integration with the town centre, its effect upon infrastructure and its likelihood of delivery. All such matters are areas of legitimate interest. The Council is of the view that the considerations and constraints which affect the site, for example transport infrastructure, connectivity to the town centre and water management, are capable of adequate resolution; with regard to these matters and in acknowledgment of the Statement of Common Ground and the submitted planning application, I have found insufficient substantive evidence upon which to disagree.
219. I have noted the particular concerns of various representors. Whilst potential development in the vicinity of the south west proposal has been historically promoted without success, the submitted CS must be examined with regard to current evidence. This evidence supports the levels of overall development for Chippenham. The Council has submitted its intended approach. Notwithstanding my conclusions below, the evidence available to me does not indicate that development to the south west of Chippenham cannot be

assimilated reasonably into the landscape with due regard to connectivity to the town centre and the provision of necessary associated infrastructure.

220. Submitted Core Policy 10 would also deliver 8ha of employment land and 700 dwellings at 'Rawlings Green, East Chippenham'. The site is located east of the railway line and north of Monkton Park estate. I am mindful of the Statement of Common Ground<sup>100</sup> between the Council and the potential developer which indicates broad agreement of the principles to be adopted in bringing the site forward and the absence of insurmountable hurdles to its delivery. The site is reasonably well located to the existing built form of the town and there is no evidence to indicate that the masterplanning process to be adopted in bringing the site forward would not provide an effective means of ensuring that considerations and constraints affecting the site cannot be resolved adequately and in a timely fashion.
221. There is therefore a body of evidence which provides support for the strategic allocations identified in the submitted version of Core Policy 10. However, the Council and I are obliged to consider whether reasonable alternatives exist in order to ensure that the submitted plan is justified adequately.
222. During the preparation of the submitted CS, the Council considered there was positive scope for further strategic development to the east of Chippenham. The approach presented was amended, with reasoning supplied by the Council in draft Topic Paper 14, following consultation on the Wiltshire 2026 publication. In this context, yet not exclusively so, a number of concerns have been expressed at the way in which the Council has considered alternatives to the content of Core Policy 10 and the way in which options have been assessed. In short, I share some of those concerns.
223. It is important, as indicated by case law<sup>101</sup>, that the SA can withstand scrutiny as an evidence source which assists in justifying the content of the CS. With this in mind, the proponents of unallocated land to the east of Chippenham (the '2020 site') have submitted detailed evidence identifying potential shortcomings in the Council's SA and site selection process. A primary concern is the way in which the Council has dealt with the 2020 site in relation to other options.
224. Whilst recognising that professional judgements need to be made in undertaking the SA process, it is important that the SA process deals with reasonable alternatives in a fair and comparable manner. The reasoning for the Council's amended approach to strategic sites in Chippenham can be found within Topic Paper 12<sup>102</sup> and elsewhere. The process of site selection has been informed by the iterative SA which has been updated on numerous occasions. Yet the evidence does not indicate that the Council considered equitably or clearly the reasonable alternative of a reduced East Chippenham allocation (compared to the Wiltshire 2026 proposal) against the preferred option that ultimately found its way to be part of Core Policy 10.
225. The Council's SA states that transport impacts are a key issue in the

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<sup>100</sup> WCS/SoCG/07 and 07A

<sup>101</sup> Save Historic Newmarket Ltd v Forest Heath DC, SSCLG (2011) EWHC 606 (Admin); Heard v Broadland District Council (2012) EWHC (Admin) et al

<sup>102</sup> Topic Paper 12 Figure 1, Table 4 et al

consideration of Chippenham's strategic site options. However and amidst a wealth of other evidence, the assessment of Option 3<sup>103</sup> that informed the SA and which included the 2020 site, was undertaken without an assumption that a completed eastern distributor road would be provided through developer contributions. This is in contrast to the consideration of Options 1 and 2 with their associated infrastructure, the latter of which was assessed with the assumption that a necessary road bridge would be provided through developer contributions. The balance of evidence suggests both elements of infrastructure for Options 2 and 3 are capable of being delivered.

226. Whilst the Council's evidence acknowledges that mitigation in the form of a completed eastern distributor road for Option 3 was likely, the mitigation was not assumed to be in place for the testing/modelling of Option 3. Instead, Option 3 was tested on the basis of a connection to the A4. Such an approach is not equitable for the purposes of the SA; particularly when the evidence indicates that Option 3 could not be feasibly completed without the distributor road. The manner in which this matter has been treated has affected the content of the SA.
227. The consequence of such an approach risks the inaccurate identification of transport effects arising from development within the SA. The basis for the SA assessment of Option 3, particularly in terms of the 'Transport' criterion, is therefore not well founded. In this relatively narrow respect, it is unreliable evidence which does not accurately inform the identification of preferred options. The 'Entran' report prepared in support of the 2020 site provides evidence which supports a conclusion contrary to that of the Council. The justification for the different approach taken by the Council in relation to Options 2 and 3 is unconvincing<sup>104</sup>; I do not accept that the omission of testing the evidentially required eastern distributor road was necessary to ensure a 'level playing field' with other alternative options.
228. Furthermore, the evidence submitted by proponents of the 2020 site as part of the CS pre submission consultation, which includes specialist SA evidence, indicates that the 2020 site would perform better against the SA objectives than perceived by the Council. Whilst I accept that different professional judgements can be exercised, this evidence is not countered specifically and fully by the Council, has some weight and consequently introduces a degree of substantive doubt as to whether the Council's SA accurately assesses the effects of the 2020 site against the SA criteria.
229. In totality and with regard to the strategic allocations at Chippenham, the SA does not inform robustly the equitable consideration of reasonable alternatives and the subsequent content of submitted Core Policy 10. This is an unfortunate but fundamental shortcoming. I am unable to conclude that the content of the CS with regard to the strategic allocations of Core Policy 10 is sound and can justifiably form part of a sound plan.
230. To resolve this matter and following correspondence, the Council has suggested changes to the CS which would enable a Chippenham Site Allocations DPD to be produced and adopted based upon the strategic

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<sup>103</sup> Transport Strategy for Chippenham – Land Allocation Report STU/11

<sup>104</sup> EXAM/09C

intentions of the CS. The changes to Core Policy 10 would provide rational and adequate criteria to guide the Site Allocation DPD. The Council's proposed changes include a basic diagrammatic indication of where future mixed use strategic sites could be located within the text of the CS. The diagram, which is informed by earlier evidence, should be considered as merely indicative and until such time as further preparatory work upon the Site Allocation DPD, including SA, is undertaken it should not be interpreted as specifically including or excluding potential reasonable locations for necessary development; for this reason and without any prejudice to the Council's plan making process, I amend the specific reference to the A350 within my recommended modifications to ensure adequate flexibility within the plan.

231. Such an approach would facilitate a transparent and equitable consideration of how the town and surrounding area should be developed to accommodate the level of growth anticipated. The submitted content of Core Policy 10 would be altered and the strategic allocations identified therein would be removed from the CS. The proposed changes to the CS also provide for an increase in housing provision above the submitted figure which, in the context of the town's principal status, the increase in housing required across the county and within a context of realistic delivery, is justified adequately. The Council's suggested changes to its housing trajectories acknowledge the effect of the Sites Allocation DPD. I recommend accordingly (**MM36**).
232. Submissions have been made to the Examination in relation to a large number of potential development sites in and around Chippenham. It will be for the Council to ascertain, through the equitable consideration of alternatives against relevant factors, how best new development should be accommodated. In the absence of a sufficiently robust SA, I have insufficient evidence upon which to base a recommendation as to which sites should be developed through until 2026. Whilst noting the positive work undertaken to date upon the development templates in CS Appendix A, in light of my conclusion I do not comment further upon their content and MM36 would necessitate their removal from the plan.
233. Land to the south west of Abbeyfield School is identified within Core Policy 10, as submitted, as a non-strategic site. Such an allocation strikes a discordant note in the consistency of the CS which does not identify other non-strategic sites. The site may have potential for future development but inclusion with Core Policy 10 is not justified but would, in any event, be removed by the Council's proposed changes embodied in MM36.

## Summary

234. The broad strategic approach taken by the CS towards the principal settlement of Chippenham is supported by the evidence base. Core Policy 9 is justified, positive and will be effective in implementation. The thrust of Core Policy 10 requires modification to provide a basis upon which the detailed delivery of development within the town and affected areas can be considered robustly through a specific Sites Allocation DPD. Upon this basis the CS will be effective in securing its objectives.

### **Corsham Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Corsham Community Area and will it be effective in terms of delivery?**

235. The Corsham Community Area is located towards the west of the county and lies partly within the Cotswold AONB whilst forming part of the West Wiltshire Green Belt. It has a strong rural character. The Council's analysis of the role and function of settlements provides an adequate justification for the content of Core Policy 11 which establishes Corsham as a market town which provides a range of services and facilities for the surrounding area and a range of suitably designated Large and Small villages.
236. The area is influenced by larger nearby settlements, such as Chippenham and Bath and this is recognised adequately by the CS, particularly at CS paragraph 5.58. Whilst I note the concerns which have been raised, there is no substantive evidence to indicate that the CS, when applied in its entirety, would be incapable of retaining the separation of Corsham and Chippenham. The Council propose an alteration in this section of the CS which is helpful but not essential to secure soundness.
237. Within its evidence base, the Council identifies the environmental qualities of the area which have influenced the overall levels of development proposed. Furthermore, the Council appears conscious that Corsham itself has experienced relatively substantial levels of growth in recent years. As a consequence, the submitted CS identified the provision of at least 1,200 homes in the area over the plan period, of which 1,050 should occur at Corsham. The Council considered the scope for a strategic housing allocation at Corsham but concluded, for reasons summarised in the position paper<sup>105</sup>, that such provision was not required in this community area. I am mindful that CS Table 5.5 indicated 475 homes remain to be identified for Corsham albeit permissions subsequent to publication had not been accounted for in this remainder figure.
238. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for this, and other, Community Areas. Consequently, the level of indicative housing contained in Core Policy 11 is proposed to be 1395 homes, of which some 1220 would be at Corsham and 175 in the remainder of the Community Area. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly **(MM 37)**. Such a modification does not fundamentally alter the considerations or conclusions upon the necessity for a strategic allocation.
239. Submissions to the CS and the Examination, indicate that there is both developer interest and land potentially available to meet any housing and employment requirements of the locality, for example between the A4 and Bradford Road or land to the west or north of Corsham. In this context, it would appear<sup>106</sup> that only limited progress is being made on potentially

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<sup>105</sup> WC/PS/WCS – M9D

<sup>106</sup> EXAM/29B

relevant neighbourhood plans and there is a risk that such progress may stifle the delivery of housing outside of schemes deemed acceptable under the provisions of Core Policies 1 and 2. The absence of substantive and timely progress upon any neighbourhood plan increases the risk of an ineffective approach towards housing delivery. Indeed, the recommended increase in housing provision across Wiltshire will require the Council to ascertain how provision is to be made and thus the identification of specific sites by the Council in its Sites DPD as a complementary adjunct to the neighbourhood planning process. Such a process will ensure a specific supply of housing land to contribute towards identified needs and will include mechanisms that will enable due consideration, consultation and examination of the merits of all potential sites both within Corsham and elsewhere, such as Rudloe.

Allocations within the CS at this specific moment in time are not warranted. In the interim, the combination of commitments and likely 'windfall' sites will maintain a housing supply for the shorter term.

240. With regard to employment land, Corsham has a number of distinct attributes; these include a relatively high proportion of MoD property and a relatively high number of existing commitments. The town is identified in the Council's evidence base<sup>107</sup> as being a desirable employment location and that some 6ha of additional land is required to support the identified Principal Employment Area. Following consideration of options, particularly via the Employment Land Review and associated documents, the Council concluded that a specific allocation for the community area was not warranted. On the basis of the available evidence, which includes submissions made to the Examination such as relates to Sands Quarry for example, I have no substantive reason to disagree. The Employment Land Review emphasises the need for a 'Plan, Monitor, Manage' approach to employment requirements and, with regard to the Council's revised monitoring framework, the review opportunities offered by the CS Review and the production of other planning documents, I am satisfied that such an approach can prove effective. A specific employment land allocation is not warranted at this time.

241. In common with other community areas, the Council has worked with its partners in assessing the requirements and factors which will influence development of the community area, these include matters of essential infrastructure such as transportation. In these regards, CS paragraph 5.59 is supported adequately by the available evidence which includes the Community Strategy and the Corsham Community Area Plan. There is no substantive reason to consider the range of identified matters are not justified or capable of being effectively resolved where relevant in association with other elements of the CS. I am satisfied that the CS, particularly paragraph 5.59, acknowledges the heritage significance and community value of Corsham and the surrounding area adequately and on a justified basis.

242. The Council has suggested changes to CS paragraph 5.59. These clarify a more flexible approach to retail provision in Corsham which is supported by the evidence referred to by Topic Paper 6. The changes also clarify the approach to be taken towards new development in order to maintain the integrity of the Bath and Bradford on Avon Bats SAC and relate to the AONB. I recommend such changes as main modifications to ensure the effectiveness

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<sup>107</sup> Topic Paper 7 et al



of the plan (MM38).

243. With due regard to the consideration of alternatives, the CS does take a justified approach towards the Corsham Community Area and will be effective in terms of delivery.

### **Calne Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Calne Community Area and will it be effective in terms of delivery?**

244. The Calne Community Area lies to the north of the county. As justified adequately by Topic Paper 3 and associated documents, Core Policy 8 identifies the market town of Calne, with its range of services and facilities, as the primary settlement surrounded by a variety of designated Large and Small villages. There is no robust evidence to suggest the CS policies for maintaining the integrity of individual settlements are flawed or that there is a need for specific countryside protection policies for land east of Chippenham.

245. As throughout Wiltshire, the CS sets a strategy for the area that seeks to balance housing growth with job creation. This is consistent with the CS as a whole. In essence, the submitted Core Policy 8 indicated that a minimum of 1,380 dwellings would be provided over the plan period with 1,240 occurring in Calne. Allowing for commitments, CS Table 5.3 indicated the need for a further 410 homes to be identified, 370 of which would be within Calne. The Council's position paper<sup>108</sup> summarises the justification for such figures. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for the Calne Community Area. Consequently, the level of indicative housing contained in Core Policy 8 is proposed to be 1605 homes, of which some 1440 would be at Calne and 165 in the remainder of the Community Area. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly (MM 39).

246. It is clear from the evidence that the Council has considered the need for a strategic allocation within the community area, indeed an early iteration of the CS contained a housing allocation to the north-east of Calne which was assessed against alternatives. As set out in Topic Paper 12, a subsequent planning permission for 285 dwellings resulted in a lesser requirement for the town which was not deemed strategic within the context of the overall county and the CS. Indeed, further subsequent permissions have reinforced the Council's contention that a strategic allocation is not warranted.

247. I agree with the thrust of the Council's analysis. Whilst the recommended increase in housing provision across Wiltshire as a whole will require the Council to ascertain how such provision is to be made within each HMA and will require the specific identification of sites, this will be secured reasonably via the Sites DPD as a complementary adjunct to the neighbourhood planning

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<sup>108</sup> WC/PS/WCS/M9E

process which is underway within the town and elsewhere<sup>109</sup>. I accept, based on submissions to the CS and the Examination, that there are areas of land around the town which have the potential for new development, for example to the south or east, but the balance of evidence does not support the essential need to make allocation within the CS at this moment in time.

248. With regards to employment land, the evidence indicates that Calne has a reasonably established employment base, is influenced by the principal settlement of Chippenham and is not located on a strategic road corridor. The Council proposes a change to the CS to provide 6ha of employment land over the plan period with 3.2ha identified on land east of Beverbrook Farm and Porte Marsh Industrial Estate that forms a saved North Wiltshire Local Plan policy. The evidence, including the Employment Land Review and Topic Paper 7, supports the adequacy of such a stance and I recommend a main modification accordingly (MM39).
249. Working in partnership and with regard to the IDP, the Council has assessed the existing and likely required levels of infrastructure to support the community area and levels of development proposed over the plan period. In so doing, the Council has had regard to the community strategy and the Calne Community Plan. Indeed, as shown in the Council's position statement, there is a proactive record of joint working on community initiatives within Calne. Such work is reflected in the content of CS paragraphs 5.41 and 5.42 albeit I recommend the Council's proposed changes to ensure an appropriate recognition of the North Wessex Downs AONB and the designated Air Quality Management Area (MM40).
250. Overall, and mindful that all relevant parts of the CS apply, the submitted plan takes a justified approach towards Calne with appropriate regard to alternatives and will be effective in terms of delivery.

### **Devizes Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Devizes Community Area and will it be effective in terms of delivery?**

251. The Devizes Community Area could be described as occupying the rural heart of the county and lies partially within and predominantly to the west of the North Wessex Downs AONB. Devizes itself is an appropriately designated market town that offers a broad range of services and facilities. Similarly, the Council's evidence, including Topic Paper 3, justifies the designation of Market Lavington as a Local Service Centre within Core Policy 12 whilst clarifications of the evidence base have led the Council to suggesting changes to the listed Large and Small villages (see MM4).
252. The CS and its accompanying evidence, including the Employment Land Review and associated documents, identifies the varied nature of the Devizes' employment base and the potential which exists for the town to fulfil a strategic role as a centre providing jobs, homes, retail facilities and other services. Consequently, Core Policy indicates that approximately 10ha of employment land will be provided over the plan period upon two key sites

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<sup>109</sup> EXAM/29B

which will in turn supplement the identified Principal Employment Areas. I have noted the submissions made querying the necessity for a strategic employment land allocation, the potential for existing previously developed sites to accommodate employment growth and the potential for employment opportunities to be enhanced by broadband technology. However, with regard to the supporting evidence which includes the Council's Position Statement<sup>110</sup> and Topic Paper 7, the content of Core Policy 12 which includes strategic employment land provision is justified adequately.

253. The saved local plan allocation at Nursteed Road will provide 1.5ha of employment land. The 8.4ha of strategic employment land allocated by Core Policy 12 at Horton Road has been derived, as evidenced in part within the SA and Topic Paper 12, through an analysis of existing provision, strategic needs and through adequate consideration of alternatives. It is logically located to the north east of the town close to existing commercial development at Hopton Park. The SA identifies the sensitivity of the potential employment allocations in relation to the North Wessex Downs AONB. However, such matters can be addressed adequately by the Council's changes to the CS and the development template in CS Appendix A as supported by the available landscape and heritage evidence. The template is not fully prescriptive and as such its content is justified and will be effective. I note that Natural England does not object to the principle of the development and I have no reason to disagree or to consider that the issue of landscape and visual assessment cannot be met resolved satisfactorily. On balance, I am satisfied that the integrity of the AONB and its statutory purposes will not be compromised by the content of Core Policy 12 and the Core Strategy as modified (**MM41**).
254. Furthermore, the evidence provided by the Council indicates that it has considered adequately the infrastructure needs of the area, including transportation issues and the designated AQMA. Such evidence identifies that Devizes experiences traffic congestion along certain road corridors and there is no dispute that air quality is a cause for concern and action. Against this context, the Devizes Transport Strategy indicates that the level of growth contained within Core Policy 12 can be accommodated adequately. I am always mindful that the content of the CS must be considered as a whole and that Core Policy 12 must, for example, operate in tandem with Core Policies 55 and 60-66 which specifically address matters of air quality and transportation. Whilst concerns have been raised as to the suitability of the proposed development within the locality, the balance of the evidence is sufficient to support the objectives of the CS and the content of Core Policy 12.
255. The CS contains no strategic housing allocations for the Devizes Community Area. Alternatively and as submitted, Core Policy 12 indicated that at least 2,150 new homes would be provided over the plan period with some 1,730 within Devizes. Of these, Table 5.6 showed that 406 homes remained to be identified within the town and some 205 in the remainder of the community area.
256. A range of submissions to the CS and the Examination has suggested that there has been an underestimation of housing requirements for the community area and that there is a need for strategic housing provision. Against this

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<sup>110</sup> WCS/PS/M9F

context, I note that during the evolution of the submitted CS, the Council identified the potential for 700 homes to be accommodated in three sites effectively creating a strategic allocation for Devizes. Following a grant of permission and following consultation and review, the Council concluded that the necessary growth for the town could be accommodated without the need for any strategic allocation.

257. The evidence certainly indicates the availability of potential housing sites for the town, such as to the east and north-east, and an increase in the housing provision for the county has been recommended. Against such a background, I consider it reasonable in the interests of sustainable development to expect that any relatively self-contained market town, such as Devizes, will be able to accommodate proportionate and well planned housing growth. The Council has proposed a revised and indicative amount of housing for the Devizes Community Area. Consequently, the level of indicative housing contained in Core Policy 12 is proposed to be 2,500 homes, of which some 2,010 would be at Devizes and 490 in the remainder of the Community Area. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly (**MM 42**).
258. As referenced previously, the Council and its communities will need to consider how best the necessary level of housing should be delivered. I note that some progress is being made upon the Devizes Area Neighbourhood Plan. Historic building rates should not solely dictate future plans at the community level. With due regard to Topic Paper 12 and the increase in housing to be provided, there is no compelling evidence to conclude that the Council's decision to not identify a strategic housing site for Devizes is unjustified or that the immediate housing requirements for the community area are not capable of being met through a combination of existing commitments and the application of Core Policies 1 and 2. By undertaking further planning documents, such as the Sites DPD and complementary neighbourhood plans, the Council and its partners will be able to advance additional housing development in appropriate locations, including previously developed land and addressing needs for both market and affordable homes, as may be warranted. Such mechanisms apply equally to the community area beyond Devizes itself.
259. With regard to retail matters, the CS is underpinned by an adequately robust evidence base that includes the Town Centre and Retail Study. CS paragraph 5.65 acknowledges the evidence base sufficiently, particularly in terms of ensuring a flexible approach towards the competitive retail offer of Devizes. I am satisfied that there is adequate cross referencing between Core Policy 12 and the intentions of paragraph 5.65.
260. With due regard to the consideration of alternatives, the CS does take a justified approach towards the Devizes Community Area and will be effective in terms of delivery.

### **Malmesbury Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Malmesbury Community Area and will it be effective in terms of delivery?**

261. The Malmesbury Community Area lies in the north of Wiltshire. It is essentially rural in character and contains part of the Cotswolds AONB. Topic Paper 3 provides support for the settlement hierarchy contained within Core Policy 13 wherein the market town of Malmesbury provides the main focus for the locality and the more outlying range of justified Large and Small villages.
262. In addition to the Community Strategy, the CS has had regard to the Malmesbury and Villages Community Plan in its formulation. Furthermore, it would appear that the Council has worked proactively with Malmesbury Town Council in its advancement of its neighbourhood plan. CS paragraphs 5.69 and 5.70 capture a range of justified issues and considerations which affect the community area and which, as relevant, will be addressed by new development proposals which fall to be considered against the provisions of Core Policy 13. These include the importance of the Cotswold AONB, albeit I recommend the Council's proposed change to emphasise the AONB landscape as a consideration in development proposals (**MM43**).
263. In terms of housing provision and as submitted, Core Policy 13 indicated that at least 1,200 new homes would be provided within the community area over the plan period without the need for any strategic housing allocation. CS Table 5.7 identified the remaining need for some 270 homes to be identified within Malmesbury and some 135 elsewhere. Such figures have evolved during the preparation of the CS from a higher requirement. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for the Malmesbury Community Area. Consequently, the level of housing contained in Core Policy 13 is proposed to be indicatively 1,395 homes, of which some 885 would be at Malmesbury and 510 in the remainder of the Community Area. With due regard to the updated evidence base, including the SA, the SHMA, the Council's Topic Papers and the consultation responses, such an approach is justified adequately. Whilst I note that longer term phased employment proposals (Dyson) may affect and increase the need for housing in the immediate locality, this is a matter that can be kept under review through the process of 'plan, monitor and manage'. There is no compelling justification for increasing further the indicative housing figures for Malmesbury at this particular time and I recommend accordingly (**MM 44**).
264. Three sites to the north of Malmesbury were identified as a strategic housing site in the Wiltshire 2026 document following an options analysis referenced in the accompanying SA<sup>111</sup>. Such work illustrates the potential land available for development around Malmesbury; further evidenced by the planning application at Filands and associated appeals. The Council subsequently considered, as referenced within Topic Paper 12, that the required housing provision was not of a scale that made a notable impact on the strategic objectives for Wiltshire as a whole and thus no strategic site was allocated within the submitted CS. The available evidence supports such a conclusion adequately.
265. In the context of a recommended increase in the housing provision for the county and Community Area, it is for the Council and its communities to

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<sup>111</sup> SUS/30

determine the final distribution of such housing. There is no compelling reason to consider that a complementary combination of neighbourhood planning and the production of the Sites DPD will not be effective in clarifying the provision of housing in the medium and longer term. In the shorter term, the operation of Core Policies 1 and 2 alongside existing commitments will provide a means to secure an adequate housing supply throughout the community area. I recognise the attributes of Malmesbury in its range of services and facilities, its proportion of in-commuters and its need for increases in affordable housing. However, such factors may be considered by the Council and its partners in any process of housing site identification and at this moment in time these matters do not justify the modification of the plan to secure a strategic housing allocation.

266. Core Policy 13 takes a positive and adequately evidenced approach towards the provision of employment land. Malmesbury has key established employment sites and is located on the strategic road network. The Council's evidence, including the Employment Land Review, indicates that 5ha of new land is capable of being delivered over the plan period across two sites: land north of Tetbury Hill and the Garden Centre. These would supplement the three Principal Employment Areas. Such an approach is justified.
267. CS paragraph 5.70 addresses matters relating to retail provision in Malmesbury. Whilst not prescriptive, the approach provides some flexibility towards potential schemes that may come forward and is underpinned proportionately by sources such as the Council's Town Centre and Retail Study and Topic Paper 6. The Malmesbury Neighbourhood Plan is being advanced and will provide one suitable means to review the identified primary retail frontages of the town.
268. The Council, working as part of the broad Consultative Technical Group, has assessed the infrastructure requirements of the community area. These include issues of education, the fire station and the heritage value of the locality. These are reflected within CS paragraph 5.70 and the IDP. The balance of the evidence supports the Council's approach both in terms of content and viability.
269. Overall and with due regard to alternatives, the CS does take a justified approach towards the Malmesbury Community Area and will be effective in terms of delivery.

### **Marlborough Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Marlborough Community Area and will it be effective in terms of delivery?**

270. The Marlborough Community Area lies to the north eastern edge of the county. As identified by the Council's evidence, particularly Topic Paper 3 and its Addendum, the settlement hierarchy is led by the market town of Marlborough with underlying Large and Small Villages defined with due regard to their respective role and function. The detail of Core Policy 14 is justified in such regards.
271. As submitted, the Council identified at least 850 new homes to be located in

the Marlborough Community Area over the plan period which forms part of the eastern HMA; 455 of which have either been completed or have specific permission. Of the remainder, 220 are identified to form part of a strategic allocation on land to the west of Salisbury Road with a further 30 to be identified within the town. The remainder of the community area was intended to accommodate at least 145 new homes. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for the Marlborough Community Area. Consequently, the level of indicative housing contained in Core Policy 14 is proposed to be 920 homes, of which some 680 would be at Marlborough and 240 in the remainder of the Community Area. With due regard to the updated evidence base which indicates the potential for previously developed land to be utilised effectively, including the SA, the SHMA and the Council's Topic Papers, such an approach is justified adequately and I recommend accordingly (**MM 45**).

272. The Community Area is entirely located within the North Wessex Downs AONB. Setting aside the strategic allocation and as indicated by the SHLAA, there appears to be scope for a range of potential smaller scale housing sites to come forward across the community area to accommodate the housing identified in the CS, often upon previously developed land within settlements. With due regard to the concerns raised in relation to potential landscape impacts, the evidence indicates that adequate sites, but certainly not all those within the SHLAA, would feasibly be capable of coming forward with the likely potential to avoid harm to the purposes of designating the AONB. Such evidence includes the work commissioned by the North Wessex Downs AONB unit in relation to its landscape assessment of the main uncommitted sites in the AONB as identified in the SHLAA. The SHLAA represents a position in time which is likely to change over the plan period. Potential sites, including a proportion of windfalls, will emerge that are as yet unforeseen and whilst not all will be suitable or capable of development, I do not consider that the landscape assessment undertaken on behalf of the AONB unit warrants an automatic reduction in housing numbers for the community area nor would it justify a limitation upon the changes to housing provision envisaged by MM45.
273. The Council's own SA, in relation to Core Policy 2, indicates the general need for large scale housing development to avoid areas with specific landscape designations. In relation to Marlborough, the SA identifies the need for future development to give particular consideration to any potential impacts upon the AONB. The CS subsequently identifies a strategic allocation to the south east of Marlborough centre upon currently undeveloped farmland. As indicated by its Position Statement, the Council acknowledges the extent of the AONB but considers that such a strategic allocation is exceptionally necessary to ensure an adequate housing supply for Marlborough and the eastern HMA; the Council relies on the Framework (para 116) in support of its position. In essence, the Council cites the particular need for an adequate housing land supply for the eastern HMA and to serve the town, the limited availability of previously developed land within Marlborough itself and the capacity of the landscape to accommodate change in the Salisbury Road location. In the interests of ensuring sustainable and balanced development for the town over the plan period, I note the concerns raised, the national importance of the AONB and its purposes of designation but ultimately do not disagree with the Council's approach.

274. The evidence indicates that the Council has considered alternative approaches towards housing within the town, including alternative locations. The Council's Strategic Site Options – Landscape Assessment<sup>112</sup> provides an indication of the extent to which site options may affect the landscape and the degree of visual change resulting. In summary, the Salisbury Road site is identified<sup>113</sup> as being capable of accommodating change without far reaching landscape impacts due to a combination of its valley topography and some existing mature vegetation.
275. I saw the location of the site from various vantage points. Indeed, the effect of potential development upon the landscape character of the locality and the AONB should not be underestimated. Whilst the site is reasonably well related to the town in terms of road access and proximity, the undeveloped nature of the fieldscape, the undulating public approaches and longer distance views from the west all increase the potential for notable adverse visual effects. However, with due regard to the CS Development Template and whilst I agree in part with the landscape assessment of the Salisbury Road site undertaken on behalf of the North Wessex Downs AONB Unit, specifically in the evident loss of arable land, the effect on the views from a footpath to the south and the development beyond the existing settlement, the effect appears capable of being contained into the immediate locality.
276. As indicated by the Framework (para 116), a balance needs to be struck between the statutory purposes of AONB designation and other factors. In this instance, I agree with the Council's interpretation of the evidence which indicates that a limited degree of development upon the Salisbury Road site is both justified and clearly preferable to alternative locations such as Chopping Knife Lane in sustainability terms. The undue limitation of housing for an existing market town, such as would be secured by not having a modest degree of growth, would not satisfy the strategic objectives of the Core Strategy as a whole.
277. A number of representations have been made querying, amongst other matters, the principle, the scale and the deliverability of the Salisbury Road site. Representations have been made suggesting that housing numbers should be curtailed for Marlborough such that a reduced, if any, scale of development should occur outside of the existing town boundary. The balance of the evidence, including the SHMA and SHLAA, indicates that some degree of new development is warranted. The Council's Landscape Assessment clarifies that there is some capacity for change at Salisbury Road and the nature of the development should be such that a meaningful contribution is made to the overall needs of the East HMA and the town itself. Nonetheless, the figure of 220 new homes should not be considered a minimum and any development must have regard to any appropriate site specific Landscape and Visual Impact Assessment which should inform the final scheme that is promoted.
278. In essence, I have little reason to dispute the position of the Council and the land owner, that the site is capable of being brought forward broadly in line with the details found within CS template at Appendix A. These details address adequately a range of matters such as infrastructure, including

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<sup>112</sup> STU/42

<sup>113</sup> Ibid pp 72/73



transport, and landscape mitigation. There is a degree of uncertainty as to what will be the effective built boundary of the proposed site. Due to AONB considerations, I consider it desirable that the site should maximise its potential to mitigate any adverse landscape impacts as far as practicable. Thus the site area shown within CS Appendix A should not be considered as a means of fixing the built boundaries and the masterplanning process should be used to minimise effectively any landscape impacts within the available site envelope.

279. Concerns have been raised at the level of water abstraction within the area and whether, with particular regard to the ecological value of the River Kennet<sup>114</sup>, there are adequate resources to cater for additional growth. The evidence indicates that the Council and its partners are aware of the issue, in particular through the Council's HRA (as updated and including EXAM/89A) and through the Thames Water – Water Resources Management Plan. Whilst continued monitoring may be required, there is no substantive evidence to indicate that the levels of proposed development would have a detrimental effect upon local water resources to the extent that an alternative strategy should be pursued. Similarly, and with due regard to the Groundwater Protection Zone which is relevant to the Salisbury Road allocation, there is no substantive evidence that the strategic allocation should not be pursued for reasons of water resource impacts, such as inadequate supply or contamination. The Council appears to be discharging its Duty to Cooperate adequately in these regards, ensuring that the issue of water resources is addressed suitably.
280. The CS provides support for the three identified Principal Employment Areas and identifies scope for the provision of 3ha of non strategic employment land within Marlborough over the plan period. While this is a lower figure than indicated by the Council's Employment Land Review, the balance of the available evidence does not indicate that the Council's approach is unsound in light of the current supply of land/premises, the AONB designation and Marlborough's location away from an established economic corridor (eg the M4). The Council foresees neighbourhood planning as the mechanism for delivering such land although I note very limited progress upon neighbourhood planning in this community area. The monitoring of employment land and premises provision will be important to ensure the Council can consider alternative means of bringing forward necessary land/premises in the event that no Neighbourhood Plan emerges during the plan period.
281. Whilst Marlborough benefits from tourism activity and notwithstanding local concerns in relation to hotel provision within the area, the content of CS Core Policies 39 and 40 provide an adequate framework for determining proposals which may arise and thereby a means of, in conjunction with any future neighbourhood planning process, addressing local issues as necessary.
282. The Council has proposed changes to the CS (para 5.75) which recognise the issue of Air Quality Management Areas and which amends reference to nature conservation interests. These provide very useful clarity but are not strictly necessary to secure soundness of the plan as a whole; indeed, with due regard to the comments of Natural England and the content of the Council's HRA,

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<sup>114</sup> Including the Kennet and Lambourn Floodplain SAC

there is insufficient contrary evidence to support a conclusion that the CS would have an adverse effect upon any Natura 2000 site or create a specific biodiversity conflict within this community area. CS Core Policy 59 (as modified) and the clarifications of the Council within the supporting text to Core Policy 14 (see MM45) provide for an adequate approach to the Stonehenge and Avebury World Heritage Site which falls partly within the Marlborough Community Area.

283. With due regard to the consideration of alternatives, the CS does take a justified approach towards the Marlborough Community Area and will be effective in terms of delivery.

### **Melksham Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Melksham Community Area and will it be effective in terms of delivery?**

284. Melksham is the largest town of the community area which lies towards the west of the county. The Council's analysis of the role and function of settlements<sup>115</sup> justifies adequately the hierarchy of settlements set out within Core Policy 15 albeit the Council's suggested changes to the CS clarifies the status of Great Hinton as a Small village and the functional relationship between Melksham and Bowerhill village appropriately. I recommend accordingly (**MM 46**).

285. The submitted CS indicated at least 2,040 new homes would be provided over the life of the plan of which 1,930 should be accommodated at Melksham. No strategic sites were identified and the Council had an expectation that the neighbourhood planning process would provide a basis for delivering the remaining housing required. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for this Community Area. Consequently, the level of indicative housing contained in Core Policy 15 is proposed to be 2,370 homes, of which some 2,240 would be at Melksham and 130 in the remainder of the Community Area. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers I have no specific evidence to suggest that such an approach would not deliver suitable levels of sustainable development and is not justified adequately. I recommend accordingly (**MM 47**).

286. The principle of Core Policy 15 is consistent with the objectives of the Core Strategy as a whole. The volume of intended housing is expressed indicatively and appropriately which provides some flexibility for the overall level of provision and I am mindful that the Council's SA sets out the process which has led to the absence of any strategic site allocation for the town.

287. The CS as proposed to be changed would enable the Sites DPD and the neighbourhood planning process to facilitate the provision of the required level of housing albeit, notwithstanding the early work between Melksham Town Council and Melksham Without Parish Council, there is some current uncertainty as to when any neighbourhood plan may emerge and what it may

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<sup>115</sup> Topic Paper 3 et al

specifically address. In such a context the absence of a strategic allocation does not aid the certainty or the Plan in delivering the housing required; indeed, the provision of a housing allocation capable of delivering, for example, in excess of 400 homes would contribute to the strategic objectives of the CS in terms of housing land supply and potentially, in the event of a mixed use scheme, a more balanced economy.

288. Whilst, in the shorter term, there appears to be sufficient commitments to ensure an adequate supply of housing land for the town, there is a notable degree of uncertainty for the latter part of the plan period. The Council acknowledged in its Position Statement the scope for a Sites DPD to assist in delivering such housing which, given my earlier comments in relation to overall housing numbers for the county, seems to be the most pragmatic and efficient way of complementing the neighbourhood planning process to ensure the provision of sufficient housing to meet identified needs in a timely fashion. Such an approach may also provide an opportunity to facilitate the appropriate provision of smaller sites for the Large Villages within the community area in order to ensure the delivery of adequate housing to meet the needs of the area in a sustainable fashion. By such means it will be feasible to deliver the housing numbers shown within modified Core Policy 15 as necessary. Notwithstanding the potential availability of land as promoted by submissions to the Examination, the Council's decision to not identify a strategic allocation for Melksham at this time is, on balance, warranted.
289. With regards to employment land, Core Policy 15 provides explicit support for Core Policy 35 and the 7 listed Principal Employment Areas. Such an approach is justified by the evidence base which includes the Council's Employment Land Review.
290. I am mindful that the Employment Land Review identifies a shortage of employment land within Melksham and the likely need for a greater land supply than that contained within the CS; estimating as a guide the need for 7.7ha of employment land. However, the CS does make provision for 6ha of land to be provided at the Hampton Business Park and, as recommended by the Review, a process of 'plan, monitor and manage' would enable the Council to gauge what necessary actions may be necessary to ensure the employment land supply is sufficient to meet needs, for example through the Sites DPD or CS Review. Therefore I am satisfied that Core Policy 15 is adequate and proportionately justified in such regards.
291. The Council has considered the range of infrastructure available and required within the community area to support the levels of development planned. The balance of evidence does not indicate that such assessments are inadequate or flawed.
292. The CS identifies in paragraph 5.80 a comprehensive range of issues to be addressed in planning for the Melksham Community Area. These are drawn from the available evidence and cross referenced within Core Policy 15. The Council has proposed clarifications to these matters which are useful but not essential for the overall soundness of the plan as a whole. As such and subject to my modifications to ensure the effectiveness of Core Policy 15 (MM 46/47), the CS provides a positive basis for tackling such matters which may be supplemented by any community led plan that may emerge, for example

the vitality of the town centre through the work of the Town and Melksham Without Parish Councils.

293. Core Policy 16 reflects work undertaken to provide a canal link between the River Avon and the Kennet and Avon Canal. There are benefits to be derived from the initiative and the policy effectively safeguards the intended route. Based upon the available evidence there is no reason to consider the policy unjustified.
294. Overall, and with due regard to the consideration of alternatives, the CS does take a justified approach towards the Melksham Community Area and will be effective in terms of delivery.

### **Mere Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Mere Community Area and will it be effective in terms of delivery?**

295. The Mere Community Area lies to the western edge of county and forms part of the area covered by the adopted South Wiltshire Core Strategy. Mere itself is the local service centre for the area with reasonable transport links provided by the A303 and A350. The Council is clear that the adopted strategy for the area is intended to continue within the submitted CS. The principle of the adopted approach appears founded in evidence, particularly in the Council's analysis of the role and function of settlements and in its prior consideration of alternatives.
296. As submitted, the level of anticipated housing growth is expressed as a modest 250 homes. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for the Mere Community Area. Consequently, the level of indicative housing contained in Core Policy 17 is proposed to be 285 homes, of which some 235 would be at Mere and 50 in the remainder of the Community Area. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly (**MM 48**). Employment growth appears to be catered for by a proportionate allocation of 3ha of land and I have no reason to consider that this arrangement would be insufficient or is not justified. There are no strategic development allocations shown within the CS and there is no evidence to suggest that a contrary position should be taken.
297. The community area lies partly within the Cranborne Chase and West Wiltshire Downs AONB which is reflected suitably within the Council's proposed change to the CS (para 5.86). The evidence indicates that adequate infrastructure exists to accommodate the levels of growth anticipated and I have no reason to disagree.
298. Overall, the modified CS and Core Policy 17 take a justified approach towards the Mere Community Area and will be effective in terms of delivery.

## **Salisbury Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Salisbury Community Area and will it be effective in terms of delivery?**

299. Salisbury is one of the three Principal settlements within Wiltshire. Core Policies 20-22 flow directly from the strategy for the Salisbury Community Area which has been established by the adopted South Wiltshire Core Strategy. As referenced in its Position Statement<sup>116</sup> and elsewhere, the Council considered whether the content of the South Wiltshire Core Strategy remained justified and the extent to which changes might be required prior to submitting the county wide CS for Examination.
300. The CS, in summary, seeks to deliver a range of mixed use, strategic sites to establish more sustainable and self contained communities, building upon the relative health of the city centre whilst acknowledging issues which include inequalities, access to housing and the need to address climate change. CS paragraph 5.109 sets out a number of specific planning issues relevant to the community area that is derived adequately from the available evidence which includes the Salisbury Vision<sup>117</sup>.
301. I am mindful of the range of detailed evidence that was produced in support of the South Wiltshire Core Strategy and its examination. Such evidence sets out the Council's preferred approach towards the provision of some 29ha of employment land as indicated by Core Policy 20 which also supports the Principal Employment Areas at Old Sarum and Southampton Road. The employment land is identified to be provided across a number of strategic sites (including UKLF at Wilton). The balance of the evidence indicates that the approach is justified and capable of delivery.
302. As submitted, Core Policy 20 allows for the provision of at least 6,060 new homes, nearly 4,000 of which will be located upon 6 strategic sites. Allowing for commitments, CS Table 5.13 indicates that fewer than 350 homes remain to be identified. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed no change to these figures. Once again, with due regard to the available evidence which includes the grant of various planning permissions and the work underpinning the development templates in CS Appendix A, the strategic sites appear capable of effective delivery. With due regard to the findings of the Examination into the South Wiltshire Core Strategy, the Council will need to keep its housing requirement and land supply under review utilising mechanisms such as the CS review and the Sites DPD. However, Core Policy 20 as submitted is clear that the volume of new homes is expressed as a minimum thus not precluding the delivery of additional homes over the plan period. The Council has suggested changes to Core Policy 20 in relation to the way in which the level of new development and growth within the city are referenced. Whilst relatively minor, such changes would ensure consistency within the CS when read as a whole. On balance, I consider that they are necessary to secure the soundness of the

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<sup>116</sup> WCS/PS/M9K

<sup>117</sup> CPP/80

document as a whole and to clarify the way in which Core Policy 20 is expressed for the city which will remain the urban heart and focus for southern Wiltshire and the associated HMA. I recommend accordingly (**MM29**).

303. Appendix A of the CS contains development templates for the Salisbury strategic sites. The balance of evidence supports the level of detail which they contain and this includes due consideration of a range of infrastructure. I have no substantive reason to consider the sites are not capable of being delivered effectively.
304. Core Policies 20 and 21 identify the provision of additional retail and leisure floorspace within the city that is justified by a number of evidence sources, particularly the Council's Town Centre and Retail Study and Topic Paper 6. The CS seeks to optimise the city centre location of The Maltings/Central Car Park. There is no substantive evidence to indicate that the approach of the CS is not justified or capable of delivery. As such, the objectives of Core Policy 21, in combination with the detail contained in the development template which includes the appropriate albeit minor modification of the Council to reference an anchor store, provide a justified and positive framework for delivery that is consistent with national policy.
305. The Council, working as part of the broad Consultative Technical Group, has assessed the infrastructure requirements of the community area and the developments proposed. These include issues of education and water resources. This is reflected, for example, within the CS development templates, CS paragraph 5.109 and the IDP. The balance of the evidence supports the Council's approach both in terms of content and viability.
306. The CS acknowledges the transportation issues which affect the city and locality. Whilst the CS contains a suite of specific policies relating to transport, CS paragraph 5.109 makes clear that all strategic development will need to consider their individual and cumulative effects. I heard much debate and some concerns at the way in which the Council was developing and implementing the city Transport Strategy and how the content of the South Wiltshire Core Strategy was reflected in the CS. Whilst I am satisfied that specific reference to projects or details are not necessary to secure the soundness of the CS, I do accept that the Council's proposed additions to the CS will make clear that transport solutions will need to be delivered in accordance with the evolving Salisbury Transport Strategy, based upon the radical option identified in the informative evidence of the 'Options Assessment Report'. Such an approach will enable due consideration of developing transport initiatives and, for example, how any necessary modal shift should be facilitated, such as by developing the theme of 'Smarter Choices'. For reasons of clarity and effectiveness, I recommend this change as a main modification (**MM49**).
307. The development templates are intended to be read in association with the IDP. There is recognition within the CS that the infrastructure requirements within the IDP may change over time and that the Council will need to be flexible and responsive to changes. As such, the transportation requirements identified within the templates are not designed to be fully prescriptive. The Council has proposed changes to the relevant templates to clarify the link with

the Salisbury Transport Strategy and more site specific transport assessments and travel plans. Such an approach, in combination with the necessary masterplanning processes and community engagement, provide an adequate opportunity to address the transport requirements of sites on an individual and city wide basis. I recommend accordingly (**MM50**).

308. The Council acknowledges adequately the presence of Natura 2000 sites albeit that a proposed change is necessary to ensure the effectiveness and accuracy of CS paragraph 5.109 (**MM51**).
309. Core Policy 22 takes a criteria led approach towards the 'Salisbury Skyline' that is designed to preserve the character of the city and protect important views of the cathedral and the city's roofscape. Such an approach is justified.
310. As referenced further below, Core Policy 23 relates to Old Sarum Airfield which resides in the Southern Wiltshire Community Area. The Council has proposed a change to the CS to relocate the policy within the document which, whilst logical, is not strictly necessary to secure the overall soundness of the CS.
311. Overall and with due regard to the consideration of alternatives, the CS does take a justified approach towards the Salisbury Community Area and will be effective in terms of delivery.

### **Pewsey Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Pewsey Community Area and will it be effective in terms of delivery?**

312. The Pewsey Community Area is predominantly rural in character and a significant proportion lies within the North Wessex Downs AONB. As justified by the Council's analysis of the role and functions of settlements, Pewsey is a large village which operates as a Local Service Centre and not, due to its limited employment base and relative size, as a Market Town. The settlement hierarchy identified within Core Policy 18 is duly justified.
313. The Council identify Pewsey as the focus for new development and modest growth over the plan period. With regard to employment land, the Council has relied upon its evidence base, particularly the Employment Land Review, to inform Core Policy 18 which identifies the requirement for 2ha of land over the plan period. As evidenced by the Employment Land Review, this is not a strategic priority. I have no substantive reason to consider that this figure, which will supplement the identified locally important rural employment sites, is unjustified or that the overall approach is flawed. The Council has clarified that 1.66ha of land will be provided via the saved Local Plan allocation at Marlborough Road wherein a change in ownership may facilitate its delivery. On the balance of the evidence I recommend this change for reasons of clarity and effectiveness accordingly (**MM52**).
314. As submitted, Core Policy 18 identified the provision of at least 600 homes in the community area over the plan period whilst CS Table 5.11 indicated that 285 homes remained to be identified. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed no change to these figures albeit the

number of homes is expressed in terms of 'approximately 600'. This level of growth and approach appears justified by the available evidence, including the Spatial Strategy Background Paper and by the nature of the settlements within the Pewsey Community Area and their relationship to other locations within the HMA. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately.

315. As is common to all community areas, the Council will need to keep its housing requirement and land supply under review utilising mechanisms such as the CS review and the Sites DPD. On this basis, the CS figure should not be viewed as a target and additional development above the approximate figure of 600 homes, contributing towards the housing needs of the HMA, may be justified. Whilst submissions to the Examination have indicated that potential housing land is available, there is insufficient substantive evidence to support the need for a strategic allocation or for a specifically greater volume of housing at this particular moment in time. There is undoubtedly a need for increased levels of affordable housing but of itself this is not a sufficient justification for an overall increase in housing volumes for either Pewsey or the wider community area; the CS provides other mechanisms whereby affordable housing provision can be secured.
316. Indeed, the CS and its evidence base, particularly the SA, note the existence and implications of the AONB designation which covers much of the community area. I have had regard to the submissions made and the work commissioned by the North Wessex Downs AONB Unit which assessed SHLAA sites in and adjacent to the AONB. Such work is informative and indicates the potential challenges to be faced by the Council and others in realising the effective delivery of its housing intentions. However, the work does indicate the potential acceptability of some sites in landscape terms and is predicated upon the SHLAA which, by its nature, is an iterative document that is subject to constant change as potential sites are identified, developed or are discounted. The Council's proposed changes to the CS identify appropriately the importance of the AONB designations across the county and, in relation to Core Policy 18, the importance of the North Wessex Downs AONB in particular. For reasons of effectiveness and consistency with national policy, I recommend a main modification accordingly (**MM53**).
317. The required non-strategic forms of development will be secured through a combination of Core Policies 1 and 2 and, as necessary, through the community planning process and the Sites DPD. Indeed, I note that some progress is being made in the advancement of neighbourhood planning for some settlements. The balance of the evidence indicates the feasibility of such means in delivering necessary housing and employment land over the plan period whereby the consideration of specific sites, for example that promoted at Salisbury Road or to the north west of Pewsey, in conjunction with the AONB designation and any associated landscape impacts can be made. Such an approach is justified adequately and there is no reason to consider that it will not be effective in delivery. The CS has considered the AONB designation and its implications for this community area and I do not find the document flawed in such regards.
318. The Council has proposed changes to the CS which update and clarify the intended approach to Natura 2000 sites. I recommend these as main



modifications for reasons of effectiveness and legal compliance (**MM54**) and, with due regard to the Council's HRA, am satisfied that CS approach is justified adequately.

319. CS paragraph 5.92 identifies a range of issues and considerations pertinent to the community area which will need to be addressed, as necessary, through the application of Core Policy 18. These are derived reasonably from both the Community Strategy and from the Pewsey Community Plan. Subject to the changes confirmed above, the CS is justified in such regards and will be effective.

320. Overall, the CS does take a justified approach towards the Pewsey Community Area, with due regard to alternatives, and will be effective in delivery.

### **Royal Wootton Bassett and Cricklade Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Royal Wootton Bassett and Cricklade Community Area? Will it be effective in terms of delivery?**

321. The Royal Wootton Bassett and Cricklade Community Area lies to the east of the county, in close proximity to Swindon. The market town of Royal Wootton Bassett fulfils the role of the primary settlement with the Local Service Centre of Cricklade to the north. With due regard to the Council's analysis of settlements, the settlement hierarchy contained in Core Policy 19 is justified adequately. As indicated by Topic Paper 3, the Council considered the potential of Lyneham and Purton to constitute Local Service Centres but, with regard to their role and function, concluded that they were appropriately designated as Large Villages. As shown within Topic Paper 3 (Appendices) Lyneham has a role influenced heavily by the presence of the military and a limited function in acting as a service centre for the wider area, which contains the nearby settlements of Royal Wootton Bassett and Calne. Purton, despite its secondary school serving a wide catchment area, is relatively close to Swindon, Cricklade and Royal Wootton Bassett. On such a basis there is insufficient robust evidence to support either settlement being designated as Local Service Centres. As set out in the Council's evidence, Bradenstoke is justified reasonably as a Small Village.

322. In common with the other community areas, the CS sets out a strategy for employment and housing that is based on the settlement hierarchy and which reflects the Council's evidence that Royal Wootton Bassett fulfils a dormitory function relative to Swindon. Consequently, three Principal Employment Areas are identified to be supported in accordance with Core Policy 35 whilst 5ha of employment land is identified for the area over the plan period; 3.7ha of which will be on land west of Templars Way in Royal Wootton Bassett.

323. The employment land provision is derived from the Council's Employment Land Review which acknowledges the need for increased self-containment for Royal Wootton Bassett and its proximity to the M4 yet also an acceptance that the demand for new employment land is less likely to be for inward investment. Given the location of the town, I have no substantive reasons to disagree. The Council's SA examined potential strategic employment land allocations and concluded that the land west of Templars Way would be

preferable to that at the former St Ivel factory for reasons of heritage impacts and preferable to the extension of the Interface Industrial Estate due to issues of flood risk. Such an approach is sound.

324. The Council confirmed during the Examination that the Purton Brickworks site is not, as it previously identified, 'built out' and therefore, as a saved North Wiltshire District Local Plan allocation, it should be retained in Core Policy 19. I agree and have recommended a main modification (MM2) which will clarify the identified employment land supply for the community area.
325. In terms of housing, no strategic allocations are identified within the submitted CS albeit such options were considered and, following the granting of various planning permissions, discounted. As seen by CS Table 5.12 which shows housing completions and commitments, Core Policy 19 requires no further housing sites to be identified for Royal Wootton Bassett over the plan period and only 115 units are required for the rest of the community area. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for this Community Area. Consequently, the level of indicative housing contained in Core Policy 19 is proposed to be 1,455 homes, of which some 1,070 would be at Royal Wootton Bassett and 385 in the remainder of the Community Area. Given the levels of need across the wider county, I consider that these are relatively low figures. However, and with due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly (**MM 55**). The Council consider that non-strategic housing sites can come forward under the neighbourhood planning process (wherein Plans for Royal Wootton Bassett and other areas appear to be in preparation) and/or the Sites DPD.
326. I have received contrary views from participants to the Examination in relation to the volume of housing proposed within the CS, a number of which suggest that the overall housing figure for the community area is too low and that there is available land, for example to the south or north of Royal Wootton Bassett, which could readily accommodate an increase in provision and a strategic allocation (potentially mixed use). I am mindful of such submissions and I do not question the availability of land. However, the Council's strategy towards this community area is cogent, consistent with the objectives of the CS as a whole, is supported by evidence and the housing volumes are expressed indicatively thus not precluding additional provision.
327. The Sites DPD will provide an opportune moment, working alongside any neighbourhood planning processes, to review the need for additional housing land in Royal Wootton Bassett and the Community Area as a whole. With due regard to the representations made, there is insufficient justification for any altered approach towards Purton, Lyneham or other settlement at this time. The available evidence does not support the identification of strategic sites or specific contingency sites supplementing an alternative volume of housing.
328. Core Policy 19 provides a suitable means to address adequately the justified range of issues and considerations detailed in CS paragraphs 5.98 and 5.99 and potentially the IDP. These include matters of infrastructure, retail provision, nature conservation, railways, landscape value and the AONB. The

Council's proposed changes to the CS provide useful clarity to aid the effectiveness of the approach and with regard to retail and AONB matters I recommend accordingly (**MM56**). The Council's changes usefully include suitable recognition of the impacts of HGV traffic on the local road network, for example as affects Cricklade, which will complement the provisions of CS Policies 65 and 66 although are not strictly necessary to secure the overall soundness of the plan. There is no substantive evidence to suggest that the approach of Core Policy 19 is not justified adequately in these regards.

329. The Borough of Swindon abuts the community area. As shown by the Duty to Cooperate Statement<sup>118</sup> and the Statement of Common Ground<sup>119</sup>, Wiltshire Council and Swindon Borough Council have sought to engage and work constructively in planning for their respective areas and across common boundaries. I have no reason to consider that this is not continuing effectively. Amongst other matters, this work has produced the Swindon Small Scale Urban Extensions Evidence Review Paper<sup>120</sup>. Neither authority objects to the housing volumes proposed in the respective plans of their neighbour which are currently under examination. Both authorities are content that the requirement for development within Swindon can be met sustainably within locations that do not currently require an extension into Wiltshire albeit there is an acknowledged need to keep this under review whereby a joint Site Allocations DPD may be undertaken. In summary, both Councils consider that a western extension to Swindon is not required at this time to assist in meeting the objectively assessed housing needs of either authority.
330. A variety of submissions relating to a variety of sites have been made to the Wiltshire CS indicating that provision should be made for new development to the west of Swindon, either as a strategic allocation or as a contingency. I have been mindful of such matters, as referenced above in relation to Matter 4, and the historic context whereby the draft RS envisaged the need for such provision. I am also mindful that additional major development has been granted on appeal, such as at Ridgeway Farm and that at Moredon Bridge which is accounted for in CS Table 5.12.
331. As submitted, the Council considers the CS provides adequate strategic sites, to be supplemented by non-strategic development, to meet the objectively assessed housing needs of the county over the plan period. Based upon its housing evidence, its joint working and the SA which appraises alternatives, the Council identifies no need or justification for additional site provision to the west of Swindon at this time. This report identifies the need to increase the minimum housing provision over the plan period towards the upper limit of the Council's preferred range. To do so, the Council will need to consider, through mechanisms such as its planned early review of the CS, the Sites DPD and the neighbourhood planning process, how such housing will be secured. Such a reassessment may also need to be informed by the progress of the examination into the Swindon Local Plan and any revised analysis of Borough housing needs which may occur and the interplay between the town and its surrounds. Inevitably, and whilst mindful of the current content of CS Strategic Objective 3, this may necessitate a reassessment of the potential of

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<sup>118</sup> WCS/07

<sup>119</sup> SoCG/15

<sup>120</sup> ATU/117

land to the west of Swindon.

332. The evidence, such as the West of Swindon Strategic Background Paper 2009 and related documents, has historically assessed and acknowledged the potential sustainability of sites to the west of Swindon, for example Pry Farm and Washpool. Other sites also appear potentially available and have been promoted, for example in the vicinity of Hook Street. At present however, even allowing for the proposed increase in housing required by the CS, there is insufficient evidence to justify the provision of specific strategic site allocations or contingency arrangements for land to the west of Swindon.
333. With due regard to the consideration of alternatives whilst recognising the need to review the planning for increased housing volumes over the current plan period, the CS does take a justified approach towards the Royal Wootton Bassett and Cricklade Community Area and will be effective in terms of delivery.

### **Southern Wiltshire Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Southern Wiltshire Community Area? Will it be effective in terms of delivery?**

334. The CS follows the strategy established for the Southern Wiltshire Community Area by the South Wiltshire Core Strategy which was adopted in 2012 following examination. As referenced in its Position Statement<sup>121</sup> and elsewhere, the Council has considered whether the content of the South Wiltshire Core Strategy remains justified and the extent to which changes may be required prior to submitting the county wide CS for Examination.
335. In relation to the Southern Wiltshire Community Area which is influenced considerably by the nearby presence of Salisbury, I have no substantive evidence to suggest that the strategy is unjustified or that it will be ineffective over the plan period. Consequently and with regard to the Community Strategy, Core Policy 24 sets out appropriately the settlement hierarchy of the community area and the broad levels of anticipated development distributed in the Local Service Centre of Downton and elsewhere. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for the Southern Wiltshire Community Area. Consequently, the level of indicative housing contained in Core Policy 24 is proposed to be 615 homes, of which some 190 would be at Downton and 425 in the remainder of the Community Area. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly (**MM 57**).
336. Whilst there will be a requirement to keep the level of housing and its distribution under review, Core Policy 24 expresses the volume of housing indicatively and thus there is some flexibility to ensure an adequate supply of housing over the plan period. Non-strategic housing may come forwards through the existing policy framework and/or through the Sites DPD and

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<sup>121</sup> WCS/PS/M9N

community planning process. There is no persuasive evidence which suggests a strategic allocation is required at this moment in time or that the housing distribution should be altered.

337. Subject to changes proposed by the Council which I recommend as modifications to ensure effectiveness (**MM58**), the CS acknowledges a range of considerations which may act as a constraint to development, particularly the New Forest National Park, the New Forest SPA and SAC and the Cranborne Chase and West Wiltshire Downs AONB. I have noted the partnership work undertaken by the Council with relevant bodies in these regards<sup>122</sup>. The HRA and related documents, including those prepared in support of the South Wiltshire Core Strategy, indicate that the content of both Core Policies 24 and 25 are justified and, where appropriate, capable of delivery.
338. The Council has undertaken an assessment of infrastructure requirements for this community area and I am mindful that the CS, including all policies, must be read as a whole. Thus, whilst concerns have been raised at the transport linkages between Salisbury and the settlements of the community area, there is no clear evidence to indicate that the CS is flawed or would be incapable of ensuring the provision of adequate infrastructure to serve the area and new development which may occur.
339. Core Policy 23 relates to Old Sarum Airfield, a heritage asset of some significance. The Council has clarified that this is situated within the Southern Wiltshire Community Area rather than the Salisbury Community Area and whilst the proposed change to the CS certainly aids clarity, it is not necessary to secure soundness. The CS seeks to provide a positive framework to enhance and manage the airfield linked to the production of a development master plan. The available evidence supports the contingent parts of the policy and I have no reason to consider the approach flawed or incapable of effective delivery.
340. Overall and with due regard to the consideration of alternatives, the CS does take a justified approach towards the South Wiltshire Community Area and will be effective in terms of delivery.

### **Tidworth Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Tidworth Community Area? Will it be effective in terms of delivery?**

341. The Tidworth Community Area is located in the eastern part of Wiltshire. The CS draws suitably on the available evidence and seeks to promote a strategy which will redress the current dominant presence of the military as indicated by a range of information sources. In so doing the CS has had regard to the Tidworth Community Area Plan.
342. The settlement hierarchy as identified in Core Policy 26 is justified by the Council in its assessment of the role and function of settlements. Thus Tidworth and Ludgershall are market towns serving a wider range of designated Large and Small Villages.

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<sup>122</sup> WCS/PS/M9N, WCS/07 et al

343. As set out in the Council's Position Statement<sup>123</sup> and Topic Paper 7, the CS sets out an approach towards employment land that is intended to facilitate a more balanced economy. Thus the 12ha of land north of Tidworth Road is a logical and reasonable provision, supported by empirical evidence such as the Council's Employment Land Review, that will supplement the identified Principal Employment Area. Adequate consideration has been given towards reasonable alternatives.
344. With regard to housing, a strategic allocation at Drummond Park has been identified for 475 dwellings. Topic Paper 12 provides a reasonable summary justification for the allocation with due regard to potential alternatives. The balance of the available evidence supports the content of the CS in these regards. The development template provides informed guidance upon the way in which the site should be brought forwards with adequate consideration of infrastructure requirements. Whilst there will need to be an increase in past building rates with the careful monitoring of delivery and I am mindful of Appeal Decision APP/Y3940/A/13/2206963,, I have received no substantive evidence to indicate that the objectives of the CS cannot be met within this community area in a timely fashion.
345. Similarly, there are a number of potential avenues which will enable the provision of non-strategic housing: through Core Policies 1 and 2, through the community planning processes and/or through the identification of sites within the Sites DPD. The balance of evidence, which includes the SHLAA, suggests the delivery of adequate housing can be effectively achieved. The Council has proposed a minimal increase in the indicative amount of new housing for the Community Area following its consideration of overall housing provision for the county and the HMAs. With due regard to the availability of other potential housing sites there is insufficient justification for increasing the indicative housing figures further at this time. For reasons of clarity and effectiveness, including the necessary reference to protected landscapes, I recommend accordingly (MM59).
346. The Council remains cognisant of the military presence within the Tidworth Community Area and elsewhere and of the structural changes occurring within the MoD which may affect military deployment and requirements within Wiltshire. Through its existing partnership work, such matters are capable of adequate resolution to the extent that there is no necessity for any specific alterations to the CS to accommodate military needs, such as additional housing, in any alternative manner.
347. With due regard to the consideration of alternatives, the CS does take a justified approach towards the Tidworth Community Area and there is no substantive reason to consider that it will not be effective in terms of delivery.

### **Tisbury Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Tisbury Community Area? Will it be effective in terms of delivery?**

348. As in the Southern Wiltshire Community Area and others, the Tisbury

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<sup>123</sup> WCS/PS/M90

Community Area lies within the part of the county covered by the recently adopted South Wiltshire Core Strategy. The CS follows this previously adopted strategy. As referenced in its Position Statement<sup>124</sup> and elsewhere, the Council has considered whether the content of the South Wiltshire Core Strategy remains justified and the extent to which changes may be required prior to submitting the countywide CS for Examination.

349. The area lies predominantly within the Cranborne Chase and West Wiltshire Downs AONB and is rural in nature albeit with reasonable transport links provided by the A303, the A30 and the railway. The Council has proposed changes to the CS to emphasise the presence of the AONB; for reasons of effectiveness I recommend such modifications accordingly (**MM60**).
350. With the exception of the Tisbury Local Service Centre, the settlement structure is established by a range of Large and Small Villages which are designated appropriately within Core Policy 27 following the Council's analysis of their role and function.
351. Given the nature of the community area, its settlements, the adopted South Wiltshire CS and subsequent evidence, I am satisfied that there is no current necessity for a strategic housing allocation. The non-strategic housing volumes appear capable of being realised through a combination of CS Core Policies 1 and 2 and through the production of subsequent planning documents which may include neighbourhood plans. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed no change to the overall volume of housing proposed. The Council will need to keep its housing requirement and land supply under review utilising mechanisms such as the planned early review of the CS and Sites DPD. However, Core Policy 27 as submitted expresses the volume of new homes as a minimum. The Council has suggested changes which would clarify the wording of the CS as regards the levels of development proposed. These have a limited effect upon the content of the policy although would provide a degree of consistency within the CS itself. For reasons of clarity and effectiveness I recommend accordingly (**MM60**).
352. Core Policy 27 retains 1.4ha of employment land at Hindon Lane, Tisbury which, with due regard to the available evidence that includes relevant Topic Papers<sup>125</sup>, is justified adequately.
353. The CS, within Core Policy 27 and paragraph 5.143, addresses a range of specific issues which affect the Tisbury Community Area. The Council's changes to the CS aid the clarity of the plan in such regards and identify particular local concerns in relation to some narrow access roads, the sufficiency of parking in the vicinity of Tisbury rail station and the guidance relevant to the SAC. Whilst useful, such modifications are not strictly necessary to secure the soundness of the CS overall.
354. With due regard to the consideration of alternatives, the CS does take a justified approach towards the Tisbury Community Area which will be effective in terms of delivery.

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<sup>124</sup> WCS/PS/M9P

<sup>125</sup> South Wiltshire Core Strategy Topic Papers 17 and 18

## **Trowbridge Community Area**

### **With due regard to the consideration of alternatives, does the CS take a justified approach towards the Trowbridge Community Area? Will it be effective in terms of delivery?**

355. Trowbridge is the county town of Wiltshire and is one of its three principal settlements providing a focus for the wider Community Area. As set out in Topic Paper 3, its Position Statement<sup>126</sup> and elsewhere, the Council is cognisant of the strengths and challenges facing the town.
356. Core Policy 28 is a response to the identified need for suitable investment into the town. The CS prioritises the regeneration of the town centre. The Policy has been informed by a variety of evidence sources which include the partnership work of the 'Transforming Trowbridge Vision Board', their resulting Scoping and Vision Study and the emerging Trowbridge Masterplan. Whilst Core Policy 28 contains an emphasis upon the Masterplan, which provides the main reference for the suitability of development proposals, there is no substantive evidence which suggests that its production process is not robust or that any alternative strategy should be pursued. There remains a degree of uncertainty as to the way in which the final Masterplan may be produced and adopted by the Council and its partners, for example as an unexamined Supplementary Planning Document. Consequently, Core Policy 28 should maintain some flexibility to ensure justified development may reasonably be considered. The Council has proposed a change to paragraph 5.150 which, to ensure the effectiveness of the CS, I recommend with further additions to Core Policy 28 as a main modification (**MM61**).
357. The CS is supported by a proportionate retail evidence base. This includes the Council's Town Centre and Retail Study which provides an adequate analysis of both quantitative and qualitative retail needs. The delineation of the town centre is proposed by the Council to be informed by the emerging Master Plan. Such an approach is reasonable and will need to be assessed in association with the partial review of the CS which, as referenced by MM11, will provide the most practical opportunity to identify primary and secondary retail frontages. The Policies Map will be amended accordingly. MM61 incorporates the necessary modification on this matter.
358. In common with other community areas, the settlement hierarchy identified in Core Policy 29 is based upon a range of evidence, including that contained in Topic Paper 3. There is no persuasive reason to consider the listed villages to be incorrectly designated.
359. The strategy taken by Core Policy 29 is consistent with the overall objectives of the CS; to seek an appropriate and justified scale of sustainable development that strengthens the principal service centre role of Trowbridge whilst delivering a balance of housing and employment opportunities in association with improved infrastructure and facilities. The CS clearly identifies a range of specific issues to be addressed by Core Policy 29 in paragraph 5.147. These are derived adequately from the evidence base and reflect community based work such as the Community Strategy and the

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<sup>126</sup> WCS/PS/M9Q



emerging town Master Plan.

360. The CS identifies five Principal Employment Areas and a requirement for some 25ha of employment land for the plan period: 10ha at West Ashton Road and 15ha as part of a mixed use scheme at Ashton Park Urban Extension. Trowbridge is a Principal Settlement that is seeking to increase its self containment and thereby reinforce its role in the county. With due regard to the Council's employment land evidence, including Topic Paper 7 and the Employment Land Review, such figures are justified.
361. In terms of housing and as submitted, Core Policy 29 indicated that at least 6,000 new homes would be provided in the community area of which some 2,600 would be located at the Ashton Park Urban Extension. Allowing for existing commitments, some 170 new homes subsequently remained to be identified over the plan period. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for the Trowbridge Community Area. Consequently, the level of indicative housing contained in Core Policy 29 is proposed to be 7,000 homes, of which some 5,860 would be in Trowbridge supplemented by a further 950 when infrastructure and biodiversity matters have been addressed adequately. Approximately 165 homes would be built in the remainder of the Community Area. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly (**MM 62**).
362. Submissions to the Examination in conjunction with the SHLAA indicate the potential for non-strategic sites to come forward over the plan period such that I have no reason to doubt the deliverability of the housing intended, which, as necessary, can be resolved in its detail through the Sites DPD and/or neighbourhood planning process. The CS contains sufficient flexibility within its distribution of housing across HMAs to ensure that should the anticipated levels of development at Trowbridge be unobtainable, redistribution within the HMA will be feasible, for example to other market towns. The available evidence does not support the retention of land for housing at the 'Staverton Triangle' at this time.
363. The key element of the strategy for Trowbridge is the Ashton Park Urban Extension. This is a very significant addition to the south east of the town intended to deliver a mix of homes, employment land and key infrastructure that is integrated with the existing settlement. Details of the allocation are shown in the Development Template found within CS Appendix A. The Council's evidence, including Topic Paper 12 and the SA, indicates how the allocation has evolved over time with due regard to alternatives. Such evidence includes a reassessment of development viability which has led the Council to propose a change to the affordable housing target which I recommend accordingly (**MM 63**). When taken as a whole, the evidence supports adequately the submitted strategic allocation.
364. I am mindful of the Statement of Common Ground between the Council and the primary developer of the site and also that a detailed masterplanning process will be required. With regards to infrastructure, accessibility and transport, the evidence indicates that the site is capable of being brought

forward viably to meet the objectives of Core Policy 29 albeit specific details will subsequently emerge. Such details will be subject to community involvement and should maximise the potential of the site to realise a sustainable form of development, for example in relation to connectivity and transport routes. There is no substantive evidence that such an outcome is not achievable.

365. The site is currently undeveloped countryside. Inevitably, the development will impact upon the landscape. Nonetheless, the development template acknowledges the issues adequately through proposed mitigation and green infrastructure such that there is no justification for deleting the allocation. However, it is accepted by the Council, as shown within the CS template, that the urban extension must address matters of ecology satisfactorily. Indeed, the CS template identifies the conservation and enhancement of the natural environment and any species associated with the Bath and Bradford on Avon Bats SAC as a key objective.
366. The site lies near to the ancient woodlands of Biss Wood and Green Lane Wood, is in a woodland Strategic Nature Area, includes the riparian corridor of the River Biss and lies within 4km of the Bath and Bradford on Avon Bats SAC. Bechstein bats roost nearby. I remain mindful of the available evidence which includes the Council's HRA, the AA, the views of Natural England<sup>127</sup> (which do not raise objection to the principle of the allocation) and the changes proposed by the Council which further address matters of ecology. In summary, the Council considers that the strategic allocation can be brought forward acceptably in terms of its ecological effects.
367. The CS as a whole and the template in particular, provides adequate acknowledgement and reasonable protection of the nearby and potentially affected woodlands together with a cogent approach towards the River Biss corridor. The CS is sound in such regards.
368. I heard in some detail and from qualified perspectives how protected species, especially Bechstein bats with nearby maternity roosts, may or not be affected by the strategic allocation at Ashton Park linked to improvements planned for the A350 at Yarnbrook. With regard to the existing and historic species surveys, there is undoubtedly scope for ever more detailed data in relation to the presence and movement of protected species, especially bats in terms of roosting, breeding and foraging. That certain protected species are present near to Ashton Park and are vulnerable to effects arising from development is not in dispute. I received details and heard unresolved debate on the likely efficacy of potential mitigation and avoidance measures in relation to matters such as bat flight paths, the 'barrier' effect of roads, the effects of lighting and the potential pressures exerted by the proximity of new development, both residential and employment.
369. A judgement needs to be reached as to the likely effect of the strategic allocation of the CS upon the SAC, protected species and the wider nature conservation value of the area. In reaching such a judgement, I have had regard to a variety of cited national and international court judgements that have addressed the issue of the application of the Habitats Directive and

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<sup>127</sup> WCS/SoCG/05

associated regulations, particularly in relation to policy planning. Mindful of the judgement in *Feeney v SSCLG & Oxford City Council*<sup>128</sup>, the approach taken by the Council, as discussed during the Examination and expounded by the Council in document EXAM/28, appears both reasonable and justified and does not appear inconsistent with Advocate General Kokott's opinion in *Commission v UK*<sup>129</sup>. Even though these cases predate the issue of the Framework, the principles they embody remain relevant to the Wiltshire CS.

370. The issue of potential effects upon the SAC and relevant species is acknowledged by the Council's evidence (including the AA) and the suggested changes to the CS incorporate measures to ensure the integrity of the SAC and that the effect of proposed development can be addressed adequately. A conclusion that the strategic allocation would not affect adversely the integrity of the SAC is consequently justified in terms of the submitted CS. The balance of proportionate evidence, particularly with regard to the HRA and the comments of Natural England, indicates that the allocation could be brought forward acceptably and without harm to the integrity of the SAC and associated species.
371. Nevertheless, subsequent project level surveys, screening and potential AA will be required and this is robustly incorporated into the CS following the Council's proposed changes. For reasons of effectiveness and incorporating matters of flood risk, I recommend accordingly (**MM64**).
372. The Council's proposed changes to the CS indicate that land additional to the strategic site would only be capable of being brought forwards following the provision of improved secondary education facilities at the end of the plan period. I agree that adequate infrastructure should be in place to support the development proposed by the CS albeit I have amended the Council's wording to maximise the flexibility of the plan in these respects. Overall, the Council has taken an informed approach to the infrastructure requirements of the community area, including education provision, transport and water management. The IDP, the Development Template and other policies of the CS (such as Core Policies 65 and 66) address such matters adequately such that I have no substantive reason to consider the objectives of the CS are not capable of effective delivery.
373. Core Policy 30 takes a positive approach towards the provision of a low carbon renewable energy network within Trowbridge. The Policy is supported adequately by the available evidence, for example the CAMCO study<sup>130</sup>, and is consistent with other parts of the CS, such as Core Policies 41 and 28. The CS is sound in these regards.
374. With due regard to the consideration of alternatives and the modification indicated, the CS does take a justified approach towards the Trowbridge Community Area and will be effective in terms of delivery.

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<sup>128</sup> [2011] EWHC 2699 Admin

<sup>129</sup> Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland 2005

<sup>130</sup> STU/179

## **Warminster Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Warminster Community Area? Will it be effective in terms of delivery?**

375. Warminster is an historic market town situated towards the west of the county, south of Westbury and east of Frome. The surrounding community area is rural in nature and is set in a high quality landscape. Salisbury Plain lies to the east and, in particular, the Cranborne Chase and West Wiltshire Downs AONB designation covers a significant part of the southern community area. The Council's evidence assesses sufficiently the role and function of settlements within the wider community area and the range of Large and Small villages, including Chapmanslade, are reflected adequately within Core Policy 31.
376. In setting its objectives for the Warminster area, the Council has had adequate regard to the community strategy for Wiltshire and to the existing Warminster and Villages Community Plan (2005-2015). Due in part to such references, a range of issues and considerations are consequently identified within CS paragraphs 5.154 and 5.155 which are cross referenced further within Core Policy 31 itself. The Council has proposed changes to the CS to highlight the importance of the Cranborne Chase and West Wiltshire Downs AONB, and to clarify the approaches towards Natura 2000 sites, the Bath and Bradford on Avon SAC and flood risk. In light of the evidence and for reasons of effectiveness, I recommend such changes as main modifications **(MM65)**. With due regard to the Council's HRA and associated evidence, there is no compelling reason to consider that the CS fails to address adequately habitat and ecology issues within the Warminster area.
377. Core Policy 31 indicates that, in addition to the robustly identified Principal Employment Areas, 6ha of new employment land will be provided through the strategic West Warminster Urban Extension (in conjunction with 900 homes). In deriving this figure, the Council draws upon the content of the Employment Land Review and associated documents, including Topic Paper 7, which identifies the strategic location of Warminster upon the A350 and the relative buoyancy of commercial activity. With due regard to the consideration of alternatives as referenced within the SA, the balance of evidence supports adequately the employment land allocation to the west of the town.
378. In terms of housing and as submitted, Core Policy 31 indicated the provision of at least 1,770 new homes over the plan period with 1,650 occurring at Warminster. Of these and allowing for existing commitments, CS Table 5.18 indicated that the siting for 180 in Warminster town (210 for the whole CA) had yet to be identified.. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for this Community Area. Consequently, the level of indicative housing contained in Core Policy 31 is proposed to be 2,060 homes, of which some 1,920 would be at Warminster and 140 in the remainder of the Community Area. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly **(MM 66)**.

379. Subsequent details of housing distribution can reasonably emerge through the Sites DPD, complementing any neighbourhood plans which proceed. In the interim, the balance of the available evidence supports the content of Core Policy 31 as regards the West Warminster Urban Extension. Such evidence includes the Council's Spatial Strategy Background Paper, the SA and Topic Paper 15.
380. Whilst the merits of other sites have been explored both by the Council and through the CS Examination process, there are no reasonable alternatives to the strategic allocation which warrant modification of the submitted CS. Non-strategic housing, as promoted to the Examination on a range of other sites, can emerge reasonably in the context of Core Policies 1 and 2 and/or via the Sites DPD or neighbourhood planning processes. There is no compelling need to identify additional development sites in the CS at this moment in time.
381. The strategic allocation, as identified by the Council, offers a suitable opportunity to secure a coherent and sustainable urban extension to the town. It is supported, particularly by the IDP, by an adequate consideration of infrastructure requirements, including education, health, emergency services and transportation. Such matters are reflected within the CS and in terms of the Development template in CS Appendix A. The extent of the site is justified albeit any future reassessment of the County Wildlife Site at Grovelands Way may enable further complementary non-strategic development if justified in other regards.
382. As noted, Warminster is located in an area of some landscape and heritage sensitivity and I have noted the submissions to the CS and the Examination which have queried the acceptability of the urban extension in terms of landscape and heritage impacts. However, the site allocation is supported by a landscape character assessment which has identified the potentially sensitive views of the site, for example from Cley Hill, and the need to ensure such sensitivities are addressed. The CS consequently plans for suitable mitigation, such as the large landscape buffer, which provides scope for ameliorating adverse effects that could arise. The development template, including the Council's proposed clarifications, indicates that the area of the land identified is purposefully larger than that required to merely accommodate the development levels proposed in order to provide scope for mitigation. Indeed, the masterplanning process necessary for the urban extension to be brought forwards will enable due consideration of a range of detailed matters that are capable of resolution, including design and landscaping. The CS development template, as proposed to be altered by the Council, will provide an adequate means of bringing the urban extension forwards satisfactorily, effectively and with due regard to ecological, landscape and heritage interests (**MM67**).
383. With regard to flood risk, the Statement of Common Ground between the Council and the Environment Agency<sup>131</sup> recommend alterations to the CS and I have recommended such changes accordingly (**MM64**). Whilst there are flood risk issues to address, the balance of the evidence, which includes work emerging from the masterplanning process, indicates that these are capable of adequate resolution in relation to the urban extension. The Council proposes a change to the template to reflect the viability evidence which indicates a

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<sup>131</sup> WCS/SoCG/04

reduced affordable housing target. This is justified and encompassed in MM67 albeit, as made clear by the Council, the requirement for affordable housing will be subject to CS Core Policy 43 thereby enabling specific viability evidence for a different proportion to be considered as necessary. There is no compelling evidence which supports the need for the allocation of contingency or alternative sites at this time. In the event that the urban extension appears problematic to deliver in an expeditious manner, avenues such as the planned early review of the CS could enable an effective means of revising the planned approach towards Warminster. The balance of evidence, which includes the progress being made upon the required masterplan and the IDP, indicates that the strategic allocation for the town is capable of effective delivery.

384. The CS identifies the role of the Warminster Town Plan<sup>132</sup>, as a community led regeneration initiative, in strengthening and developing the retail core of the town centre. To be effective, any such plan should be consistent with the strategy, objectives and policies of the CS and the Framework. The balance of available evidence suggests that positive progress is being made in such regards albeit the intended status of the document in relation to the development plan is yet to be determined. Regardless, the suite of policies within the CS, subject to the necessary clarification upon primary and secondary frontages to be undertaken by the Council, provides an adequate basis for determining proposals within the town.

385. With due regard to the consideration of alternatives, the CS as modified does take a justified approach towards the Warminster Community Area and will be effective in terms of delivery.

### **Westbury Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Westbury Community Area? Will it be effective in terms of delivery?**

386. The Westbury Community Area is in the west of Wiltshire. Following its analysis of the role and function of settlements, the Council has designated Westbury as a market town serving a limited range of Large and Small villages. With due regard to the evidence which includes Topic Paper 3, such an approach is justified adequately.

387. The town of Westbury is geographically positioned between the larger settlements of Trowbridge and Warminster with Frome to the east. It retains a relatively significant employment base due in part to its position within the strategic road network and the existence of Westbury rail station. As a consequence, the Council has identified the town as being a suitable location for strategic employment development and this is reflected in Core Policy 32. The remainder of the community area is rural in character.

388. CS paragraph 5.163 identifies a number of specific issues which the Council considers need to be addressed throughout the community area. These include securing a balance between employment opportunities and housing provision, facilitating town centre enhancements, addressing traffic congestion and air quality whilst maintaining the integrity of the Salisbury Plain SPA. Such

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<sup>132</sup> CPP/126

matters have in part been derived from the Community Strategy and with regard to the Westbury Community Plan. Subject to further discussion below, these are justified.

389. The Council's evidence, which includes the Wiltshire Workspace and Employment Land Strategy, the Employment Land Review and Topic Paper 7, identifies that Westbury should accommodate around 18ha of employment land. The rationale for such a relatively significant figure includes the town's west Wiltshire location upon the strategic road network, the demand for suitable premises in this location and to assist in meeting the objective of securing a greater degree of self-containment for the town as a whole. I have no substantive evidence that weighs heavily against such factors.
390. Whilst the amount of employment land earmarked for Westbury is significant, it has also been justified by the Council in response to the Future Employment Needs in Wiltshire – Employment Floorspace and Land Forecasts<sup>133</sup> which identifies the need for growth in western Wiltshire. The 18ha are therefore intended to contribute to the broader needs of the county and on such a basis there is no compelling reason to consider the content of the CS is unjustified.
391. Core Policy 32 states that in addition to the justified Principal Employment Areas, 3.8ha of employment land will be provided at North Acre Industrial Estate and 14.7ha via a strategic allocation for Mill Lane. The former is derived from a saved West Wiltshire Local Plan allocation and is a logical extension to the existing commercial development in its vicinity. The latter site is predominantly agricultural land that lies to the north of the town.
392. The SA provides details of the Council's assessment process for the strategic employment allocations and the consideration of reasonable alternatives. There is no substantive evidence to suggest the Council's conclusions upon the strategic allocation at Mill Lane, as informed by the SA and other evidence, is flawed so as to warrant significant modification or deletion. As indicated by the SA, the site is well related to the commercial development of the West Wilts Trading Estate which lies to the west. However, the site is predominantly agricultural land and is separated from the core of the town itself. The scale of the development at Mill Lane will fundamentally affect the current character and appearance of the locality. It is consequently imperative, as set out within the CS Development Template, that the masterplanning process for the site addresses thoroughly issues such as transport, access, landscaping, drainage, layout and design in order that the process of change is addressed comprehensively and adequately. On such a basis the allocation is justified.
393. The evidence base for the CS includes the Council's Historic Landscape Assessment which has informed the strategic allocation process for Westbury. Following consultation, the Council has sought to clarify how it has addressed the issue of the heritage assets whose significance would be potentially affected by the Mill Lane allocation, particularly the setting of the listed building of Hawkeridge Farmhouse. In this regard I am mindful of the various submissions made to the Examination, including the Hawkeridge Farmhouse

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<sup>133</sup> STU/89

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## Setting Assessment<sup>134</sup>.

394. Given the nature of the farmhouse, its position and historic relationship with the existing landscape and its subsequent proximity to the strategic allocation, I am in little doubt that the setting of the farmhouse would be affected by the employment land to be provided at Mill Lane. However, it is also clear from the identified boundary, the content of the development template and the evidence base itself, that the evolution of the strategic allocation has been undertaken in the knowledge of the buildings which exist along Mill Lane. There is now no doubt as to the precise location of the listed building which can be considered fully as part of any masterplanning exercise to be undertaken. Whilst details of any employment development are currently unknown, the public benefit to be secured from the additional employment land, in terms of jobs and economic sustainability, would be potentially significant. The potential harm to the setting of the listed building remains to be determined although may be less than substantial and would appear capable of at least partial mitigation. The balance of the evidence leads me to conclude that the heritage considerations affecting the Mill Lane allocation do not warrant any modification or deletion of the allocation itself.
395. As indicated by available evidence, including the Statement of Common Ground<sup>135</sup>, the promoter of the site<sup>136</sup> and the Council anticipate that delivery of the site is feasible during the plan period, albeit with regard to a masterplanning process and, inevitably, the response of the market to the opportunities to be offered. The Council, as evidenced by the development template and the IDP, has taken a proportionate approach in assessing the infrastructure implications of the strategic employment allocation and, overall, the approach taken by Core Policy 32 towards employment land is justified adequately and will be effective. I note that an outline planning permission has been granted<sup>137</sup>.
396. With regards to housing and as submitted, Core Policy 32 indicated that at least 1,390 new homes would be provided in the community area over the plan period, with some 250 being provided via the strategic allocation at Station Road. CS Table 5.19 showed that sites for some 350 homes remained to be identified. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for the Westbury Community Area. Consequently, the level of indicative housing contained in Core Policy 32 is proposed to be 1,615 homes, of which some 1,500 would be at Westbury and 115 elsewhere. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly (**MM68**).
397. Subsequent details of housing provision can emerge reasonably through the Sites DPD complementing any neighbourhood plans which arise. In the interim the balance of the available evidence, which includes the SA, supports the modified content of Core Policy 32 as regards the Westbury Community

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<sup>134</sup> Environmental Dimension Partnership Feb 2013

<sup>135</sup> WCS/SoCG/02

<sup>136</sup> PS/M9S/08

<sup>137</sup> 14/03118/OUT



Area.

398. The approach towards housing provision within Westbury has altered over time and it is clear from documents such as the SA, the Strategic Sites Background Paper and associated documents, that the Council has considered reasonable alternatives in allocating Station Road for development. These include an option involving the relocation of Matravers School which was ultimately discounted due to deliverability concerns. The potential for the Station Road allocation, based in part upon a previous Local Plan intention, to contribute towards the strategic objectives of the Council in providing key infrastructure warrants the inclusion of the site as a strategic allocation.

399. A number of other potential housing sites have been identified by promoters which may have individual merit; however, none would constitute strategic development as considered by the Council in Topic Paper 12 and none represent reasonable alternatives to the principles embodied in the strategic allocation at Station Road. Such sites may come forward where justified through the provisions of Core Policies 1 and 2 or through the Sites DPD and neighbourhood planning processes. Such available mechanisms negate the need for a specific reference within the submitted CS to a 'direction of preferred growth' upon which there is currently insufficient evidence to draw a robust conclusion.

400. However, as seen by the submissions to the CS and the Examination<sup>138</sup>, there is some uncertainty as to the overall viability and deliverability of the Station Road site as contained in the CS. I consider that this is reinforced by the Council's Affordable Housing Viability Study which notes the marginal viability of the site and a variety of scenarios whereby the returns on the site fall below indicative viability thresholds. Indeed, the developer interest within the site considers that the land allocation should be increased in size and approached more flexibly to ensure a viable scheme is delivered: *'Without a much more flexible approach to the provision of development at Westbury or additional funding, the viability of the strategic site is potentially marginal'*<sup>139</sup>. The evidence presents a degree of ambivalence as to the viability of the site, being dependent in part upon infrastructure costs and any housing recovery in the wider market.

401. Whilst the developer interest has indicated the need for an enlarged strategic allocation to accommodate a greater volume of housing, this is resisted by the Council. The evidence upon such a point is somewhat limited. A succinct statement in relation to viability and the need for a greater net developable area is to be found within the site promoter's Position Statement<sup>140</sup>. The Council's revised viability evidence has led to a proposed reduction in the affordable housing aspirations for the site which will enhance the likelihood of viable delivery. For reasons of effectiveness I recommend accordingly **(MM69)**.

402. Thus, the Station Road site is justified as a strategic allocation. There are no reasonable alternatives which can be considered strategic in nature. Its effective and timely delivery will be assisted by MM69. Consequently, the

<sup>138</sup> For example: PS/M9S/07 and 09, WCS/SoCG/03 and 3A

<sup>139</sup> PS/M9S/09 para 40.1

<sup>140</sup> PS/M9S/09

evidence in support of a specific enlargement of the allocation is insufficient, in terms of its precision and justification, to justify a modification of the CS by increasing the site area and volume of housing. The developer and the Council have set out a delivery timetable for the site which shows, in any event, that commencement would not occur until 2017/18. I therefore consider that the most pragmatic way forwards is to retain the strategic allocation as submitted within the CS but with increased flexibility to enable further review of the site in light of further evidence which may arise in terms of infrastructure and affordable housing requirements and any recovery in the housing market. Such evidence will become clearer over the next 12/18 months during the preparation and consideration of the outline planning application anticipated in the Statement of Common Ground. Such flexibility will enable the Council to work with all partners and the community, for example as part of the Sites DPD, planned early review of the CS or through the neighbourhood planning process, to confirm or revise the size and requirements of the site potentially in parallel with consideration of how additional housing land to meet the needs of the HMA may be required within Westbury. I recommend accordingly (**MM70**).

403. In terms of the strategic allocations and the wider community area, the Council has worked alongside its partners in assessing the likely infrastructure requirements and other issues which may affect development proposals over the plan period. These are reflected adequately and flexibly within Core Policy 32, the development template and CS paragraph 5.163 which reference adequately a range of matters including air quality, education, water management, transportation and access to the Westbury lakes. In the interests of clarity and effectiveness, I recommend the Council's proposed changes to paragraph 5.163 as they affect the Salisbury Plain SPA and the Bath and Bradford Bats SAC (**MM71**).
404. The Council has responded to submissions to the CS and the Examination by proposing changes to the CS to clarify its approach to the LaFarge site, including the retention of the rail connection. These are useful but not strictly necessary to secure the soundness of the plan as whole.
405. Policy C3 of the West Wiltshire Local Plan (1<sup>st</sup> Alteration) is a saved policy that seeks to conserve and enhance the landscape character of defined Special Landscape Areas (SLA). Such a designation applies, amongst others, to the Wellhead Valley at Westbury and I have no evidence to suggest that it should not be retained. I heard during the course of the examination, that this landscape was of particular value and as such that it may have potential to become part of an AONB; the Council expressed a desire to be involved in any such discussions with Natural England and other bodies.
406. It is partly against this context that I received submissions in relation to Policy T1A of the West Wiltshire Local Plan (1<sup>st</sup> Alteration) which the CS indicates would also be saved. Policy T1A essentially seeks to safeguard an eastern A350 bypass route around Westbury and through the SLA. A previous public inquiry into a specific bypass proposal<sup>141</sup> concluded that the scheme was unacceptable. Amongst much evidence which includes the Council's notes<sup>142</sup>,

<sup>141</sup> Appeal Reference APP/K3930/V/07/1201863

<sup>142</sup> EXAM/08, 47 and 47A

it is reasonable to conclude that there is no current firm intention to deliver a bypass for Westbury (either east or west); certainly, such a scheme is not part of any foreseeable capital improvement programme and the evidence shows that there are no funding bids in place or intended.

407. As a consequence, there is no justification for saving policy T1A. The safeguarding elements of CS Core Policy 66 'Strategic Transport Network' effectively replace policy T1A and in the interests of ensuring a justified, effective and legally compliant<sup>143</sup> plan, I therefore modify CS Appendix D to make this point clear (**MM72**<sup>144</sup>). Alternative mechanisms exist, for example the CS Review, to include transport infrastructure projects that may reasonably emerge for implementation during the existing or any extended plan period.
408. The balance of evidence when considered as a whole, with due regard to the consideration of alternatives, indicates that the CS does take a justified approach towards the Westbury Community Area. Subject to the modifications referenced above, it will be effective in terms of delivery.

### **Wilton Community Area**

**With due regard to the consideration of alternatives, does the CS take a justified approach towards the Wilton Community Area? Will it be effective in terms of delivery?**

409. As in other community areas, the Wilton Community Area occupies a location covered by the recently adopted South Wiltshire Core Strategy. The CS follows this previously adopted strategy. As referenced in its Position Statement<sup>145</sup> and elsewhere, the Council has considered whether the content of the South Wiltshire Core Strategy remains justified and the extent to which changes may be required prior to submitting the countywide CS for Examination.
410. The Community Area lies partially within the Cranborne Chase and West Wiltshire Downs AONB and is situated to the west of Salisbury. It is consequently affected considerably by the presence of the city which provides employment opportunities and a wide range of services and facilities. Core Policy 33 defines Wilton itself as a Local Service Centre whilst the remainder of the community area contains a range of Large and Small Villages suitably designated following the Council's analysis of their role and function.
411. Due in part to the proximity of Salisbury, the community area contains no strategic allocations for housing or employment land albeit the housing provision for Salisbury does include land at the redundant Land Forces HQ site at Wilton. The CS makes clear that the housing requirement for Wilton is included within the strategy for Salisbury.
412. There is no compelling evidence to indicate that the absence of strategic allocations is flawed whilst the provision of non strategic housing appears capable of being realised through a combination of CS Core Policies 1 and 2

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<sup>143</sup> Planning and Compulsory Purchase Act 2004 Schedule 8 (2) – as amended

<sup>144</sup> The Council will need to update the LDS to reflect this modification in due course

<sup>145</sup> WCS/PS/M9T

and potentially through the production of subsequent planning documents which may include neighbourhood plans. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for this Community Area. Consequently, the level of indicative housing contained in Core Policy 33 is proposed to be 255 homes. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly (**MM 73**). Core Policy 33 expresses the volume of housing indicatively and thus there is reasonable flexibility to ensure an adequate supply of required housing over the plan period.

413. The CS, within Core Policy 33 and paragraphs 5.170 and 5.171, addresses a range of specific issues which affect the Wilton Community Area and the balance of available evidence indicates that such an approach will be effective. The Council's changes to the CS aid the clarity of the plan in such regards yet, whilst useful and with the exception of that which ensures an effective approach to Natura 2000 sites and the AONB (**MM74**), such modifications are not necessary to secure the soundness of the CS overall.

414. With due regard to the consideration of alternatives, the CS does take a justified approach towards the Wilton Community Area and will be effective in terms of delivery.

**Matter 10 – Infrastructure, Monitoring and Delivery (Whole Document, IDP, CP3 and CP60 – 69)**

***Does the CS address adequately the provision of necessary infrastructure to support the delivery of the strategic objectives and the Vision? Are the Core Strategy's monitoring targets justified adequately and of a level of detail that is appropriate to a Core Strategy? How will the effectiveness of the Core Strategy be managed?***

415. Core Policy 3 provides a clear and justified approach towards the provision of infrastructure necessary to support new development; this policy must be considered in parallel with all other elements of the CS, such as Core Policy 52 'Green Infrastructure' and the development templates in Appendix A. The Council differentiates between 'essential' and 'place-shaping' infrastructure and, if necessary, prioritises the timely delivery of the former albeit states that the latter should not be viewed as being of lesser importance. Such an approach incorporates flexibility in its implementation and is not, in itself, unreasonable.

416. The CS is clear that the infrastructure requirements linked to any specific development proposal will need to be considered when sufficient details are known, for example at the point when a planning application is being prepared or submitted; thus the objectives of Core Policy 3 provide a non-prescriptive but adequate indication of how infrastructure matters should be resolved. In so doing, the Council and the CS indicate a sufficient understanding and consideration of the interrelationship between the tools by which infrastructure may be secured, such as the use of planning obligations and/or the CIL. I note that there is a commitment within the CS to producing a supplementary planning document to aid the effective delivery of the CS intentions. The

Council also remains committed to producing a CIL charging schedule which, whilst slipping in terms of its intended production, is subject to separate examination. The principle of the Council's approach appears sound. Overall, I am satisfied that the approach of the CS is consistent with national policy and can be effective in operation.

417. Inevitably the requirements for infrastructure, in all its guises, changes over time. The Council recognises the need to be flexible in how it assesses and plans for infrastructure provision, particularly in relation to planned levels of new development. As a consequence, the Council identifies the need to ensure its approach to infrastructure is capable of review and amendment. This is reflected in Core Policy 3. The IDP is the main iteration of infrastructure requirements relating to the CS and has been subject to update during the course of the Examination<sup>146</sup>. The Council indicates an intention to review the IDP annually. The broad approach of the IDP, as updated, is to categorise infrastructure projects, prioritise their necessity, identify their timing, cost, funding and lead delivery agencies whilst quantifying the potential risk to effective implementation where necessary. With due regard to the Framework, I find such an approach justified and consistent with national policy.
418. The IDP contains clear evidence of appropriate partnership working with key external organisations, for example the Environment and Highways Agencies, the emergency services and utility providers. It contains, as far as is practicable, proportionately detailed information on projects that will be necessary to support the CS in securing its objectives. The production of the revised IDP during the course of the Examination is indicative that the Council is taking an up-to-date and robust approach towards the assessment and provision of necessary infrastructure, recognising that masterplans, proposals and subsequent plans where applicable, will enable further opportunity for refining and clarifying the specific details of what infrastructure will be required where and when.
419. The IDP incorporates considerations of funding, development viability, risk and contingency for the plan as a whole and at a regional, county and community level. A range of funding sources is identified albeit there is a degree of uncertainty as to what such sources may contribute specifically towards necessary infrastructure, for example CIL, Local and Regional Growth Funds. The Council's CIL Schedule is not finalised and therefore provides somewhat limited evidence in support of the deliverability of key infrastructure at this time. There is, in part as a consequence, some uncertainty within the IDP as to whether identified funding gaps may be overcome, for example where specific projects rely upon a combination of the Council and developer contributions to secure their delivery. Nonetheless, the IDP illustrates a cognisance of how infrastructure planning is approached within Wiltshire and provides a most useful list of prioritised projects, their phasing and delivery intentions, their likely cost and the likely funding sources. I recognise that in terms of strategic sites and in addition to the IDP and the Development Templates in Appendix A, detailed masterplanning will be undertaken with community involvement. This will provide an appropriate opportunity to refine the infrastructure requirements and delivery for such sites. At a broader strategic level, the IDP provides adequate support for the approach of the CS.

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<sup>146</sup> EXAM/66A - W

420. The IDP assesses the degree of risk of the identified infrastructure projects not being delivered and the consequent effect upon the objectives of the CS. The need for contingency arrangements is referenced within the IDP although there are no specific measures promoted. In essence the IDP recognises that as new development proposals come forward, there will be an increased awareness of which elements of infrastructure may be at particular risk of non-delivery; at such times the Council and its partners will seek to identify contingency measures or the review of its relevant objectives. Such an arrangement is somewhat ad hoc but, given the pressures upon available funding sources, is one which is not capable of ready resolution. On balance, the Council indicates an awareness of the risks to infrastructure delivery and the potential need for contingency actions which is adequate for the purposes of the CS.
421. To be sound, the CS must be effective. The effectiveness of any plan is partly dependent upon the means by which its implementation is managed. The effective use of monitoring against suitable benchmarks is a key means by which the success of a plan may be gauged. I view such matters of particular importance. Following the 2013 hearings held as part of the Examination, the Council has reviewed and revised its approach towards the monitoring of the CS. Whilst the monitoring criteria have been removed from each CS Policy within the main document, the Monitoring Framework for the Wiltshire Core Strategy<sup>147</sup> has been updated and is clearly referenced within Section 7 of the CS wherein there is a commitment to prepare an Annual Monitoring Report that will assess the operation of Core Policies linked to both the IDP and the SA. The updated Monitoring Framework provides a consistent and cogent means by which the links between Core Policies and the CS objectives are made. Consequently, the Monitoring Framework provides a list of relevant targets and indicators which are specific to the Core Policies themselves and will provide a means of capturing relevant data, for example annual housing completions, that will inform the Council as to whether necessary management actions are required.
422. The Monitoring Framework, being associated critically with the CS but not formally part of its content, will be capable of review and further revision in light of circumstances. Thus additional justified targets and indicators could be created to ensure the CS is being effective. Such matters may be the subject of continuing dialogue within the Council and with interested parties on particular topic areas, for example biodiversity and the need to find a means of assessing the potential effects of development upon sensitive sites or species. However, the balance of the available evidence suggests that, overall, the Council has in place a rational and adequate means of monitoring the effective implementation of the CS.

### **Transport Related Policies**

423. Core Policies 60 to 66 relate to transport matters. They are underpinned by a broad variety of evidence, referenced within Topic Paper 10 'Transport', which includes the Local Transport Plan<sup>148</sup> and associated documents. As with all elements of the CS, the content of the plan needs to be considered universally

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<sup>147</sup> STU/227

<sup>148</sup> CPP/06

and as a whole. Many of the transport policies will be jointly applicable to new development proposals.

424. Core Policy 60 seeks to reduce the need to travel, particularly by the private car, whilst encouraging the safe movement of people and goods within and through Wiltshire. The objectives of the policy are consistent with the Framework, reflect the Local Transport Plan and I am satisfied that adequate reference to the issue of road safety is incorporated. The policy is also consistent with other elements of the CS, without replicating the transport considerations affecting individual Community Areas, for example Salisbury. Whilst the Council has proposed clarification changes to the Policy, these are not essential for the soundness of the plan.
425. Core Policy 61 relates specifically to the potential effects of new development upon transport. Whilst the content of Core Policies 60 and 61 complement one another and potentially could have been combined, there is no substantive reason why the Council's approach should be considered flawed or unjustified. As such, Core Policy 61 provides some additional detail as to how transport assessments should reflect the transport hierarchy, which is appropriately identified within the policy, and incorporates references to rail within the broad term 'public transport'. In such regards, the CS is justified adequately.
426. In line with the Council's general approach to transport matters and in a manner consistent with the Local Transport Plan and the Framework, Core Policy 62 seeks to address the effects of development upon the transport network. In essence the policy clarifies the need for developments to assess their network effects and to mitigate their adverse impacts. Such an approach is reasonable. The policy seeks to limit, but not to prohibit in all scenarios, access points onto the primary route network for reasons of safety and to maintain traffic flow. On the balance of the available evidence such a stance is justified. The Council has usefully suggested a change to paragraph 6.155 which will clarify the interpretation of the policy but such a modification is not essential for the soundness of the plan as a whole.
427. Core Policy 63 identifies the role of Transport Strategies in helping to facilitate sustainable development growth within Wiltshire and at Chippenham, Trowbridge and Salisbury in particular. There is no necessity for this part of the CS to repeat the content of the plan in relation to these principal settlements. During the course of the Examination, I heard that such strategies are essentially iterative intentions to deliver integrated transport measures tailored to each identified settlement. The general thrust of Core Policy 63 is justified and consistent both with the CS and the Framework. The Council recognises within its iterative Monitoring Framework<sup>149</sup> that the stated indicators may need to be updated and reviewed in partnership with interested bodies to ensure the efficacy of the policy; I agree and commend such an approach to ensure the objectives and criteria of the policy are met. Notwithstanding such work, the balance of evidence supports the Council's view that Core Policy 63 will be effective in operation.
428. Core Policy 64 represents an important element of the Council's strategy towards increasing the use of sustainable modes of transport. As such, the

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<sup>149</sup> STU/227

policy provides a positive framework for the deployment of 'demand management' measures focussed upon parking and traffic management which are derived in large part from evidence provided by the Local Transport Plan. Such measures are justified adequately and incorporate sufficient flexibility, for example in relation to unallocated car parking in residential developments, such that they will be effective in operation. Cycle parking is a matter that is encompassed in the Council's intended Cycle Parking Strategy and there is insufficient evidence to suggest that this is not an acceptable means by which provision should be assessed and made.

429. Notwithstanding the above, it is also important that the role of what the Council term: 'smarter choices measures', is recognised fully. Such measures can incorporate the use of travel plans, car sharing and publicity which are capable of encouraging the modal shift in transportation use that the Council wishes to facilitate. The Council has suggested a change to the CS to incorporate these matters and I recommend accordingly for reasons of effectiveness and compliance with national policy (**MM75**).
430. Core Policy 65 seeks to address the movement of goods within and across Wiltshire in a sustainable and efficient manner. Once again, the CS has been informed by the Local Transport Plan and the existence of the Freight Strategy and the work emanating from the Wiltshire and Swindon Freight Quality Partnership and the South West Regional Freight Forum. The intentions of the policy, essentially to facilitate a sustainable freight distribution system making efficient use of not only roads but also rail and water networks is sensible, supported by the available evidence and consistent with national policy. The Council has proposed changes to Core Policy 65 and its supporting text to clarify the thrust of the CS which I recommend as main modifications for reasons of effectiveness (**MM76**).
431. The role and function of the strategic transport network within Wiltshire is recognised by Core Policy 66. The Council has proposed changes to the policy and its supporting text to recognise appropriately the role of the strategic bus network, Westbury rail station and the need to address issues potentially affecting protected species and Natura 2000 sites. Such changes are necessary to ensure a balanced, justified and legally compliant policy and I recommend accordingly (**MM77**).
432. Concern has been expressed during the course of the Examination at the way in which Core Policy 66 has been derived, particularly with regard to the SA and the consideration of reasonable alternatives. The SA identifies two options for Core Policy 66 which are similar in some regards; indeed, the assessments are also similar albeit the discounted option 2 is identified as having potentially greater negative effects on three of the 17 criteria. Although this may, in part, be due to the consideration of a subsequently discounted road improvement scheme, the balance of the evidence does not weigh against the chosen option which informed the content of CS Core Policy 66. Evidence in support of any policy should be proportionate and, despite concerns aired at the justification for improvements to the A350, should consider only evidentially reasonable alternatives that may exist. Core Policy 66 takes a broad and balanced approach towards the strategic transport network and is justified adequately even though subsequent schemes will need to be assessed in some detail.



## Summary

433. The CS does address adequately the provision of necessary infrastructure to support the delivery of the strategic objectives and the vision. The monitoring targets are justified adequately and of a level of detail that is appropriate to a CS, such that the effectiveness of the CS will be secured.

## Assessment of Legal Compliance

434. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS November 2011 that was updated in August 2012 and January 2014. This sets out an expected adoption date of Summer 2014. The Core Strategy's content and timing are broadly compliant with the LDS albeit subject to slippage in terms of final adoption.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in February 2010 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and, except where indicated and modifications to the CS are recommended accordingly, is adequate.
Appropriate Assessment (AA)	The Core Strategy has been subject to a Habitats Regulation Assessment as updated in 2014.
National Policy	The Core Strategy, when considered as a whole, complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
Public Sector Equality Duty (PSED)	The Local Plan complies with the Duty and is adequate
2004 Act (as amended) and 2012 Regulations.	The Core Strategy complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

435. **The Council has requested that I recommend main modifications to make the Plan sound and legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the**

**Appendix the Wiltshire Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.**

*Andrew Seaman*

Inspector

This report is accompanied by the Appendix containing the Main Modifications

## Appendix – Main Modifications

The modifications below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the modification in words in italics.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy Paragraph	Main Modification
MM 1	3	Paragraph 1.1  Paragraph 1.3	<p>Insert:  <u>The purpose of the planning system is to contribute to the achievement of sustainable development. The policies and proposals contained within this strategy, taken as a whole, constitute what sustainable development in Wiltshire means in practice for land use planning.</u></p> <p>Additional text:  <u>A strategy that underpins a policy-led framework for facilitating sustainable, long-term growth</u></p> <p><u>The Core Strategy sets out the strategic vision for delivering sustainable growth over the period up to 2026. However, it is not the only development plan document in the planning policy framework for Wiltshire. The Council is committed to bringing forward a suite of plans designed to support the Core Strategy which collectively deliver the aspirations for growth across Wiltshire.</u></p> <p><u>The Local Development Scheme includes a commitment to delivering site allocations plans for Chippenham and wider Wiltshire. These plans will address issues relating to housing delivery to ensure a surety of supply throughout the plan period in accordance with national policy; and help to compliment Neighbourhood Planning.</u></p>
MM 2	322	Appendix D	<p>Amend text in section BD1 Employment Land to indicate the following:  Continue to save the following allocations -</p> <ul style="list-style-type: none"> <li>• <u>Brickworks, Purton (3.1 ha)</u></li> </ul>
MM 3	196	CP51	<p><b>Core Policy 51 Landscape</b>  Development should protect, conserve and where possible enhance landscape character and must not have <del>an unacceptable</del> <u>a harmful</u> impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals</p>

		<p>should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been <del>considered</del> <u>conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:</u></p> <ul style="list-style-type: none"> <li>i. the locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies</li> <li>ii. the locally distinctive character of settlements and their landscape settings</li> <li>iii. the separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe</li> <li>iv. visually sensitive skylines, soils, geological and topographical features</li> <li>v. landscape features of cultural, historic and heritage value</li> <li>vi. important views and visual amenity</li> <li>vii. tranquillity and the need to protect against intrusion from light pollution, noise, and motion <del>and</del></li> <li>viii. landscape functions including places to live, work, relax and recreate <u>and</u></li> <li>ix. <u>special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.</u></li> </ul> <p>Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall <u>demonstrate that they have taken account of the objectives, policies and actions set out in</u> <del>have regard to</del> the relevant Management Plans for these areas. Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on <u>the area's special qualities (as set out in the relevant management plan)</u> <del>natural beauty</del>, must also demonstrate that it would not adversely affect its setting.</p> <p><del><b>Targets:</b> Minimise harmful impacts from development on landscape character.</del></p> <p><del><b>Monitoring and review:</b> Percentage of developments approved against professional landscape advice</del></p>
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			community such as improvements to the economy through the identification of land for employment purposes.
MM 6	27	Para 4.25 on	<p><del>4.25 Strategic allocations are set out within the area strategies. These sites are considered to be central to the delivery of the spatial strategy and strategic objectives for Wiltshire. The critical mass of development on some of these strategic sites will enable infrastructure to be provided that offers benefits beyond the scope of the development. In addition, opportunities to maximise the delivery of climate change adaptation and mitigation measures, such as the incorporation of sustainable building practices and on-site renewable energy and heat provision, will be pursued on these sites.</del></p> <p><u>The Plan also includes 'exception policies' which seek to respond to local circumstance and national policy. In doing so these represent additional sources of supply to those detailed at paragraphs 4.22 and 4.24. These policies are listed below:</u></p> <ul style="list-style-type: none"> <li>• <u>Additional employment land (Core Policy 34)</u></li> <li>• <u>Military establishments (Core Policy 37)</u></li> <li>• <u>Development related to tourism (Core Policies 39 and 40)</u></li> <li>• <u>Rural exception sites (core policy 44)</u></li> <li>• <u>Specialist accommodation provision (Core Policies 46 and 47)</u></li> <li>• <u>Supporting rural life (core Policy 48)</u></li> </ul> <p><del>4.26 In order to direct development at a strategic level to the most suitable, sustainable locations and at appropriate times the area strategies outline a housing requirement for each community area including the Principal Settlements and Market Towns. While the Core Strategy only allocates sites that are strategically important for the delivery of the overall strategy for Wiltshire, additional specific sites (non-strategic allocations) may also need to be identified in accordance with the settlement strategy to ensure the delivery of the overall strategic housing requirement. This strategy sets a clear framework for these to be delivered either through community-led planning policy documents, including neighbourhood plans or a site allocations Development Plan Document (DPD). The area strategies identify some specific issues that must be considered when planning for these areas and these should be taken into account when assessments are carried out to identify specific sites for development in particular towns. This strategy has been designed to put into place a clear framework which, together with</del></p>

		<p><del>national policy, will facilitate the delivery of community-led planning policy documents, including neighbourhood plans, at a local level which can indicate where and when development will be brought forward. It also provides the flexibility to allow subsequent planning documents, such as site specific allocations DPD to be brought forward by the council, to deliver important development should the community not deliver their own plans.</del></p> <p><del>4.27 The sources of supply have been assessed to ensure that there is a deliverable supply of housing (with additional contingency) relative to the targets for defined sub county areas, which are based on the housing market areas (HMAs) presented below.</del></p> <p><u>4.26 In order to direct development at a strategic level to the most suitable, sustainable locations and at appropriate times the area strategies contain an indicative housing requirement for each community area including the Principal Settlements and Market Towns and in the South Wiltshire HMA the Local Service Centres. This is shown in table 1 below:</u></p> <p><u>Table 1 New homes requirement by housing market area</u></p> <p><u>Housing market area Requirement</u>  <u>East Wiltshire At least 5,500</u>  <u>North and West Wiltshire At least 21,400</u>  <u>South Wiltshire At least 9,900</u>  <u>West of Swindon 200<sup>(23)</sup></u></p> <p><u>Table 1: Indicative Housing Requirements Settlements and Community Areas</u></p> <table border="1"> <thead> <tr> <th><u>Area</u></th> <th><u>Indicative requirement</u></th> </tr> </thead> <tbody> <tr> <td><u>Devizes town</u></td> <td></td> </tr> <tr> <td><u>2010</u></td> <td></td> </tr> <tr> <td><u>Devizes remainder</u></td> <td></td> </tr> <tr> <td><u>490</u></td> <td></td> </tr> <tr> <td><u>Marlborough town</u></td> <td></td> </tr> <tr> <td><u>680</u></td> <td></td> </tr> <tr> <td><u>Marlborough remainder</u></td> <td></td> </tr> <tr> <td><u>240</u></td> <td></td> </tr> <tr> <td><u>Pewsey</u></td> <td></td> </tr> <tr> <td><u>600</u></td> <td></td> </tr> <tr> <td><u>Tidworth &amp; Ludgershall</u></td> <td></td> </tr> <tr> <td><u>1750</u></td> <td></td> </tr> <tr> <td><u>Tidworth remainder</u></td> <td></td> </tr> <tr> <td><u>170</u></td> <td></td> </tr> <tr> <td><u>East Wiltshire HMA</u></td> <td><u>5940</u></td> </tr> </tbody> </table>	<u>Area</u>	<u>Indicative requirement</u>	<u>Devizes town</u>		<u>2010</u>		<u>Devizes remainder</u>		<u>490</u>		<u>Marlborough town</u>		<u>680</u>		<u>Marlborough remainder</u>		<u>240</u>		<u>Pewsey</u>		<u>600</u>		<u>Tidworth &amp; Ludgershall</u>		<u>1750</u>		<u>Tidworth remainder</u>		<u>170</u>		<u>East Wiltshire HMA</u>	<u>5940</u>
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		<p><u>Amesbury, Bulford &amp; Durrington</u>  <u>2440</u>  <u>Amesbury remainder</u>  <u>345</u>  <u>Mere town</u>  <u>235</u>  <u>Mere remainder</u>  <u>50</u>  <u>Salisbury City/Wilton town</u>  <u>6060</u>  <u>Wilton remainder</u>  <u>255</u>  <u>Downton town</u>  <u>190</u>  <u>Southern Wiltshire remainder</u>  <u>425</u>  <u>Tisbury town</u>  <u>200</u>  <u>Tisbury remainder</u>  <u>220</u>  <u>South Wiltshire HMA</u>  <u>10420</u>  <u>Bradford on Avon town</u>  <u>595</u>  <u>Bradford on Avon remainder</u>  <u>185</u>  <u>Calne town</u>  <u>1440</u>  <u>Calne remainder</u>  <u>165</u>  <u>Chippenham town</u>  <u>4510*</u>  <u>Chippenham remainder</u>  <u>580</u>  <u>Corsham town</u>  <u>1220</u>  <u>Corsham remainder</u>  <u>175</u>  <u>Malmesbury town</u>  <u>885</u>  <u>Malmesbury remainder</u>  <u>510</u>  <u>Melksham town</u>  <u>2240</u>  <u>Melksham remainder</u>  <u>130</u>  <u>Royal Wootton Bassett town</u>  <u>1070</u>  <u>Royal Wootton Bassett &amp; Cricklade</u>  <u>remainder</u>  <u>385</u>  <u>Trowbridge town</u>  <u>6810</u></p>
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			<p><u>Trowbridge remainder</u> 165</p> <p><u>Warminster town</u> 1920</p> <p><u>Warminster remainder</u> 140</p> <p><u>Westbury town</u> 1500</p> <p><u>Westbury remainder</u> 115</p> <p><u>North and West Wiltshire HMA</u> <span style="float: right;">24740</span></p> <p><u>West of Swindon</u> 900</p> <p><u>Wiltshire</u> 42000</p> <p>* This figure is 'at least'. See paragraph 4.26c below.</p> <p><u>4.26b The core strategy allocates sites and broad locations for growth that are strategically important for the delivery of the Plan for Wiltshire. Additional sites will also be identified through the Chippenham and Housing Site Allocations DPDs to ensure the delivery of housing land across the plan period in order to maintain a 5 year land supply at each HMA.</u></p> <p><u>4.26c No allocations have been identified for Chippenham in Core Policy 2 and the scale of housing for the town is expressed as a minimum, which is an exception to the approach of indicative housing requirements and identification of sites for the other Principal Settlements. A pattern of development that can best realise the town's economic potential will be identified through a separate Development Plan Document for Chippenham Town (The Chippenham Sites Allocation DPD), which will support the area strategy. It will focus on identifying land for mixed use development adjoining the built up area. Limited land opportunities within the urban area inhibit future development and this will need to be addressed urgently. Growth of the Town needs to be underpinned by investment in new infrastructure and a more detailed framework will be prepared through the Chippenham Site Allocations DPD that co-ordinates growth and key infrastructure necessary to deliver the town a more resilient long term future.</u></p> <p><u>4.26d Area strategies identify specific issues that must be considered when planning for these areas and these should be taken into account when</u></p>
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		<p><u>assessments are carried out to identify specific sites for development in particular towns. Core Policy 2 provides a framework for Parish and Town Council to lead with neighbourhood plans. The Council is also preparing a Housing Site Allocations DPD in order to ensure a sufficient choice and supply of suitable sites over the period up to 2026.</u></p> <p><u>4.26e The disaggregation to community areas set out above is not intended to be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing for each market area. It clarifies the Council's intentions in the knowledge of likely constraints; in terms of market realism, infrastructure and environmental capacity. They provide a strategic context for the preparation of the Housing Sites Allocation DPD and in order to plan for appropriate infrastructure provision.</u></p> <p><u>4.26f Indicative housing land supply, based around trajectories for each of the HMAs provide some detail on where the Housing Site Allocations DPD should focus and by when it needs to have sites identified in order to sustain proposed rates and scales of housing development. This will make up the shortfall in delivery identified towards the end of the plan period. These trajectories provide an evidence basis for an implementation strategy for a full range of housing describing how the Council will maintain delivery of a five-year supply of housing land.</u></p> <p><u>4.27 The sources of supply have been assessed to ensure that there is a deliverable supply of housing (with additional contingency) to comply with the NPPF relative to the targets for defined sub-county areas, which are based on the housing market areas (HMAs) presented below. This is detailed in Appendix C – Housing Land Supply</u></p> <p><u>4.28 It is proposed that these housing market areas will form the appropriate scale for disaggregation across Wiltshire, as they define areas within which the majority of household moves take place. Whilst within this document, community area and settlement housing requirements are provided, it is considered inappropriate to assess housing delivery at this scale. This is due to the fact that the requirements within any area could be met within neighbouring areas without compromising the strategy. However, the proposed requirements will be used as a general guiding principle for land</u></p>
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		<p>supply purposes. So for example, if Trowbridge had over-delivered relative to the identified requirement for the town, the over-delivery will begin to address the requirements of the surrounding areas. It would therefore be appropriate to count this over-delivery relative to the requirements in surrounding areas, such as Westbury. If land supply was assessed at a community area scale, without taking into account delivery across the broader HMA, then delivery could continue without a requirement being present for the HMA, or indeed for the community area, where delivery elsewhere has addressed this need.</p> <p><u>4.28 These housing market areas (HMAs) form the appropriate scale for disaggregation across Wiltshire, as they define areas within which the majority of household moves take place. It is against these HMA requirements that housing land supply will be assessed. This is in accordance with the methodology identified in the NPPF. However, in order to ensure an appropriate distribution of housing across Wiltshire that supports the most sustainable pattern of growth, indicative requirements are also provided at a community area and settlement level within the Core Strategy. These more localised indicative requirements as set out within the Area Strategy Core Policies are intended to prevent settlements receiving an unbalanced level of growth justified by under or over delivery elsewhere. They also address the ability of each Community Area to accommodate housing because of the constraints and opportunities present in each. The indicative figures also allow a flexible approach which will allow the Council including through the preparation of the Site Allocations DPD and local communities preparing neighbourhood plans to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to maintaining a deliverable five year housing land supply and delivering the strategic objectives of the plan. Neighbourhood Plans should not be constrained by the specific housing requirements within the Core Strategy and additional growth may be appropriate and consistent with the Settlement Strategy (Core Policies 1 and 2). In addition sustainable development within the limits of development or at Small Villages should not be constrained just because requirements have been reached. For these reasons the overall housing requirement is</u></p>
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		<p><u>shown as "at least", while the area strategy figures are "indicative".</u></p> <p>4.29 Despite <u>the Housing Market Areas</u> <del>this being</del> the appropriate scale for assessing land supply, the town and community area requirements should also be capable of being a material consideration to ensure that delivery is distributed broadly in line with the strategy. <del>So for in the above example,</del> whilst it is appropriate for supply in Trowbridge to provide for some of the requirement of Westbury, it would be wholly inappropriate for the entirety of Westbury's requirement to be added to Trowbridge. <u>The policy framework sets out the strategic pattern of growth, while allowing some flexibility to respond to future, spatially distinctive opportunities and constraints.</u> Indeed, across the plan period, delivery should be in general conformity with the delivery strategy. Similarly, development that provides housing for the population of Swindon rather than that of Wiltshire should not be assessed against the <del>Wiltshire housing requirements</del> <u>for the Wiltshire Housing Market Areas</u>. Should any development beyond that already committed come forward in this location, this will be additional to the housing requirement for Wiltshire. A specific <del>requirement</del> <u>acknowledgement</u> has been made for the existing commitment at Moredon Bridge and Ridgeway Farm <sup>footnote</sup> at the West of Swindon for <del>900</del> <u>200</u> homes. Development in this area does not meet the requirement for <del>Wiltshire and so this has been excluded from the defined housing market areas.</del> Furthermore, <del>these 900 dwellings are an allowance rather than a requirement, and should they not be delivered on the identified site, there will be no requirement to find an alternative.</del> <u>As part of the planned early review of the CS, the Council will clarify that its housing requirement will be met without relying upon the delivery of homes to the west of Swindon.</u> The delivery strategy defines the level of growth appropriate within the built up area of small villages as infill. For the purposes of Core Policy 2, infill is defined as the filling of a small gap within the village that is only large enough for not more than a few dwellings, generally only one dwelling. Exceptions to this approach will only be considered through the neighbourhood plan process <u>or DPDs.</u></p> <p><b>Core Policy 2</b></p> <p>Replace Core Policy 2 in line with EXAM/96</p>
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			<p><del>Targets: Qualitative: The delivery of levels of growth in conformity with the Settlement Strategy.</del></p> <p><del>Monitoring and Review: AMR &amp; housing trajectory, number of dwellings built in sustainable locations aligned with the Sustainable Settlement Strategy.</del></p> <p><del>Delivery Responsibility: Wiltshire Council, development industry, strategic partnerships.</del></p>
MM 7	160	Para 6.13	<p>Core Policy 34 also includes an element of flexibility to allow new employment opportunities to come forward outside but adjacent to the Principal Settlements, Market Towns and Local Service Centres, and in addition to the employment land allocated by this eCore sStrategy, where such proposals are considered to be essential to the economic development of Wiltshire. <u>It also allows for the possibility of development essential to the wider strategic interest of the economic development of Wiltshire. In considering criterion viii any such proposals, should be supported by evidence to justify that they would not have a significant adverse impact upon existing, committed and planned public and private investment at sites identified in the Plan for employment development at Principal Settlements or Market Towns.</u> Support for such proposals will be an exception to the general approach, and any applications of this nature will need to be determined by the relevant planning committee (and not by officers using delegated powers).</p>
	161	Core Policy 34	<p><b>Core Policy 34</b>  <b>Additional employment land</b>  Proposals for employment development (use classes B1, B2 or B8) will be supported within the Principal Settlements, Market Towns and Local Service Centres, in addition to the employment land allocated in the Core Strategy. These opportunities will need to be in the right location and support the strategy, role and function of the town, as identified in Core Policy 1 (settlement strategy) and in any future community-led plans, including neighbourhood plans, where applicable.</p> <p><u>Proposals for office development outside town centres, in excess of 2,500sq metres, must be accompanied by an impact assessment which meets the requirement of national guidance and established best practice, and demonstrate that the proposal will not harm the vitality or viability of any nearby centres. All such proposals must also</u></p>

			<p><u>comply with the sequential approach, as set out in national guidance, to ensure that development is on the most central site available.</u></p> <p>Outside the Principal Settlements, Market Towns and Local Service Centres, developments that:</p> <ul style="list-style-type: none"> <li>i. are <u>adjacent to these settlements and</u> seek to retain or expand businesses currently located within or adjacent to the settlements <u>or identified in Core Policy 1</u></li> <li>ii. support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification <u>or</u></li> <li>iii. are for new <u>and existing</u> rural based businesses within or adjacent to Large and Small Villages <u>or</u></li> <li>iv. are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council</li> </ul> <p>will be supported where they:</p> <ul style="list-style-type: none"> <li>v. meet sustainable development objectives as set out in the policies of this Core Strategy <u>and</u></li> <li>vi. are consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity <u>and</u></li> <li>vii. are supported by evidence that they are required to benefit the local economic and social needs and</li> <li>viii. would not undermine the delivery of strategic employment allocations <u>and</u></li> <li>ix. are supported by adequate infrastructure.</li> </ul> <p><del><b>Targets:</b> Deliver additional employment land beyond specific allocations at suitable locations; deliver employment land for higher value sectors; increase rural employment premises and encourage diversification.</del></p> <p><del><b>Monitoring and Review:</b> Quantum of employment land delivered, and quantum of land developed for employment by type to be monitored through the Wiltshire Monitoring Framework.</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council, Development Industry.</del></p>
MM 8	163	Core Policy 35	<p>Wiltshire's Principal Employment Areas (as listed in the Area Strategies) <u>should</u> <del>will</del> be retained for employment purposes within use classes B1, B2 and B8 to safeguard their contribution to the Wiltshire economy and the role and function of individual towns. Proposals for renewal and intensification of the above employment uses within</p>

			<p>these areas will be supported.</p> <p><del>Elsewhere w</del><u>Within</u> the principal settlements, market towns, <del>and</del> local service centres <u>and</u> <u>Principal Employment Areas</u> proposals for the redevelopment of land or buildings <del>previously or</del> <u>currently or last</u> used for activities falling within use classes B1, B2 and B8 must demonstrate that they <del>meets at least one of the following criteria and will</del> <u>be assessed against the following criteria: ...</u></p>
MM 9	164	Core Policy 36	<p><b>Core Policy 36</b>  <b>Economic regeneration</b>  Regeneration of brownfield sites will be supported in the Principal Settlements, Market Towns and Local Service Centres where the proposed uses help to deliver the overall strategy for that settlement, as identified in Core Policy 1 (Settlement Strategy) and in any future community-led plans, including Neighbourhood Plans, and/or enhance the vitality and viability of the town centre by introducing a range of active uses that <del>do not compete with</del> <u>complement the existing town centre.</u></p>
MM 10	164	Para 6.20	<p>Regeneration initiatives may also come forward in the Market Towns, and Local Service Centres. The Core Strategy supports the development of community-led plans, including town plans and Neighbourhood Plans to support and facilitate economic regeneration in these settlements, and the preparation of master plans for specific sites may also be appropriate. <u>Initiatives in other settlements will be considered on an individual basis and against the objectives and policies of the Core Strategy in combination with any community led plan that may exist.</u></p>
MM 11	166	Para 6.25	<p>....Any necessary amendments to these frontages and corresponding policies will be identified through <del>a subsequent planning policy document the</del> <u>Wiltshire Core Strategy Development Plan Document (Partial Review)</u>. The Review will update <u>retail/town centre policies across Wiltshire consistent with the NPPF</u>. It will:</p> <ol style="list-style-type: none"> <li><u>1. Consider the network and hierarchy of centres</u></li> <li><u>2. Define the extent of primary and secondary frontages, town centres and primary shopping areas</u></li> <li><u>3. Set policies to make it clear which town centres uses will be permitted in town centres/primary shopping areas</u></li> <li><u>4. Allocate a range of suitable sites to meet the scale and type of town centre uses needed</u></li> </ol>





			<p>most central site available.</p> <p><del><b>Targets:</b> Reduce proportion of new retail development occurring outside Primary and Secondary Retail frontages.</del></p> <p><del><b>Monitoring and Review</b> Percentage of completed retail, office and leisure development occurring within town centres to be monitored through Wiltshire Monitoring Framework</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council,</del></p>
MM 12	169	Core Policy 40	<p><b>Core Policy 40</b>  <b>Hotels, bed and breakfasts, guest houses and conference facilities</b></p> <p>Proposals for new hotels, bed and breakfasts, guesthouses or conference facilities, <u>together with the sensitive extension, upgrading and intensification of existing tourism accommodation facilities will be supported within:</u></p> <ul style="list-style-type: none"> <li>i. <u>the Principal Settlements and Market Towns; or will be supported.</u></li> <li>ii. <u>Proposals for new hotels, bed and breakfasts and guesthouses within Local Service Centres, and Large and Small Villages will be supported where the proposals are of an appropriate scale and character within the context of the immediate surroundings and the settlement as a whole ; or</u></li> <li>iii. <u>Outside the settlements above, where proposals will be supported that involve the conservation of buildings that for contextual, architectural or historic reasons should be retained and otherwise would not be.</u></li> </ul> <p><del>Proposals for new hotels, bed and breakfasts and guesthouses within Local Service Centres, and Large and Small Villages will be supported where the proposals are of an appropriate scale and character within the context of the immediate surroundings and the settlement as a whole.</del></p> <p><del>Permission may exceptionally be granted for proposals for new hotels, bed and breakfasts and guest houses outside the settlements identified above, where proposals involve the conversion of buildings that for contextual, architectural, or historic reasons should be retained and would otherwise not be.</del></p>

			<p>In all cases it must be demonstrated that proposals will:</p> <p>i. not have a detrimental impact on the vitality of <del>the town centre Primary Shopping Frontages or the viability of existing hotels, bed and breakfasts, guesthouses or conference facilities;</del> and</p> <p>ii. avoid unacceptable traffic generation.</p> <p>Proposals for the change of use of existing bed spaces provided in hotels or public houses or conference facilities to alternative uses will be resisted, unless it can be clearly demonstrated there is no longer a need for such a facility in either its current use, or in any other form of tourism, leisure, arts, entertainment or cultural use....</p> <p><b>Targets:</b> <del>Increase and improve facilities for sustainable tourism.</del></p> <p><b>Monitoring and Review:</b> <del>Number of schemes permitted in line with the requirements of the policy, to be monitored through the Wiltshire Monitoring Framework.</del></p> <p><b>Delivery responsibility:</b> <del>Wiltshire Council.</del></p>
MM 13	176	Para 6.42	<p><del>6.42 In addition, all affordable housing units must be developed to the latest Housing Corporation standards.</del></p>
MM 14	176	<p>Para 6.41</p> <p>After para 6.43</p>	<p>It is anticipated that this strategy will deliver at least <u>approximately 13,000</u> <del>10,000</del> new affordable homes within the plan period. <del>, of which 2,640 have been delivered at 1 April 2011.</del></p> <p><u>6.43a A broad assessment of viability across the Plan area<sup>150</sup> clearly indicates that there are geographic disparities in terms of residual land values that warrant different affordable housing requirements. Core Policy 43 therefore contains two separate affordable housing zones (30% and 40%) as presented on the Policies Map.</u></p> <p><u>40% affordable housing zone</u>                      <u>Marlborough &amp; surrounding area, Pewsey, Bradford on Avon, Salisbury, rural villages of south</u></p>



			<p>considered.</p> <p><del>On sites of 4 dwellings or fewer a financial contribution will be sought towards the provision of affordable housing.</del></p> <p>The provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need, mix of affordable housing proposed and where appropriate, the viability of the development. All affordable housing will be subject to an appropriate legal agreement with the Council...</p> <p>...</p> <p><del><b>Targets:</b> Deliver 40% of housing on sites of 5 dwellings or more as affordable units.</del></p> <p><del><b>Monitoring and Review:</b> Quantum of affordable housing delivered and percentage of planning permissions for 5 dwellings or more with 40% or more affordable housing. To be monitored through the Wiltshire Monitoring Framework.</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council, development industry, strategic partnerships, RSL's.</del></p>
MM 15	178	Para 6.47	<p>In exceptional circumstances <del>and as a departure to national policy</del> the council may also consider exception site development that includes cross-subsidy from open market sales on the same site.</p>
	179	Core Policy 44	<p><b>Core Policy 44</b>  <b>Rural exceptions sites</b></p> <p>At settlements defined as Local Service Centres, Large and Small Villages (Core Policy 1), and those not identified within the settlement strategy, a proactive approach to the provision of affordable housing will be sought in conjunction with Parish Councils and working with local communities and other parties.</p> <p>This exception to policy allows housing for local need to be permitted, solely for affordable housing, provided that:</p> <ul style="list-style-type: none"> <li>i. the proposal has clear support from the local community</li> <li>ii. the housing is being delivered to meet an identified and genuine local need</li> <li>iii. the proposal is within, adjoining or well related to the existing settlement</li> <li>iv. environmental <u>and landscape</u> considerations will not be compromised</li> <li>v. the proposal consists of 10 dwellings or fewer</li> <li>vi. employment and services are accessible from</li> </ul>

			<p>the site</p> <p>vii. its scale and type is appropriate to the nature of the settlement and will respect the character and setting of that settlement and</p> <p>viii. the affordable housing provided under this policy will always be available for defined local needs, both initially and on subsequent change of occupant.</p> <p><b>Cross-subsidy</b> In exceptional circumstances a proportion of market housing may be considered appropriate where it can be demonstrated that the site would be unviable, as an exception site that meets the above criteria, without cross-subsidy. It should be recognised that the inclusion of open market housing will not normally be supported. In these exceptional circumstances:</p> <p>ix. the majority of the development is for affordable housing</p> <p>x. it has been demonstrated through detailed financial appraisal that the scale of the market housing component is essential for the successful delivery of the development and is based on reasonable land values as an exception site; <u>and</u></p> <p>xi. no additional subsidy for the scheme and its affordable housing delivery is required <u>and</u></p> <p>xii. <del>that any new market housing approved on this basis should be for occupation as a principal residence.</del></p> <p><del><b>Targets:</b> Deliver affordable housing in appropriate locations.</del></p> <p><del><b>Monitoring and Review:</b> Number of schemes permitted in line with the policy, to be monitored through the Wiltshire Monitoring Framework.</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council, development industry, strategic partnerships, RSL's.</del></p>
MM 16	182	Core Policy 46	<p>.... Housing schemes should assist older people to live securely and independently within their communities. Residential development must ensure that layout, form and orientation consider adaptability to change as an integral part of design at the outset, in a way that integrates all households into the community.</p> <p><del>The Council will also encourage the provision of homes which incorporate 'Lifetime Homes Standards so that they can be readily adapted to meet the needs of older people and those with disabilities.</del></p>

			<p>Developers will be required to demonstrate how their proposals respond to the needs of an ageing population....</p> <p>... In exceptional circumstances, the provision of specialist accommodation outside but adjacent to <del>defined limits of development at</del> the Principal Settlements and Market Towns will be considered, provided that:</p> <p>viii. a genuine, and evidenced, local need is justified  ix. environmental <u>and landscape</u> considerations will not be compromised ....</p> <p><b>Targets:</b> <del>Deliver specialist housing in response to local needs in appropriate locations.</del>  <b>Monitoring and Review:</b> <del>Percentage of residential development that accords with Lifetime Homes Standards and amount of specialist accommodation delivered, to be monitored through the Wiltshire Monitoring Framework.</del>  <b>Delivery Responsibility:</b> <del>Wiltshire Council, development industry, strategic partnerships.</del></p>
MM 17	183	Insert paras	<p><u>6.54a The development of new permanent and transit Gypsy and Traveller caravan sites in suitable and sustainable locations will be considered in accordance with the criteria set out in Core Policy 47. The criteria have been informed by national policy in Planning Policy for Traveller Sites. In accordance with national policy the Council will apply these criteria positively where a proposed location complies with the criteria in Core Policy 47 (footnote).</u></p> <p><u>- add footnote: Topic Paper 16: Gypsy and Travellers (including the addendum) provides an outline of how the requirement for new pitches has been determined and the basis for the criteria proposed</u></p> <p><u>6.54 b To identify pitch requirements for inclusion in Core Policy 47, a review of the 2006 Gypsy and Traveller Accommodation Needs Assessment (GTAA) was undertaken in November 2011(64). The conclusions are presented in Topic Paper 16, as amended in February 2014. As a result a need for <del>44</del> 66 additional permanent residential pitches over the next five years (2011-2016) in Wiltshire has been identified. A projection of anticipated need between 2016-2021 has also been identified with approximately 42 permanent residential pitches required. The review of need took into</u></p>

		<p><u>consideration the supply of permanent pitch provision since April 2006 (see Table 6.1 below) and evidence presented by the July 2011 caravan count. The preference in meeting need in the future is for small, private sites.</u></p> <p><u>6.54 c The council will use national policy and a criteria-based approach as set out by Core Policy 47 to identify the most suitable sites for Gypsy and Traveller pitches in the proposed Gypsy and Travellers Development Plan Document. This will add detail to the interpretation and implementation of Core Policy 47 and identify specific sites to deliver the pitch requirements set out within Core Policy 472. The Council will release land in its ownership to help ensure the identified need is met.(62). Applications that are submitted before the DPD is prepared will be assessed against the general criteria set in Core Policy 47.</u></p> <p><u>6.55 The review in Topic Paper 16 identified a need for 25 new transit pitches across the county. The provision of new transit pitches will enable pitches to be provided to meet the needs of Gypsies and Travellers who come to the area but have no permanent place to stay or are travelling through the area. The Gypsy and Traveller DPD will include specific locations to provide these new transit pitches and will include consideration of a A network of Emergency Stopping Places to will also be investigated to help meet the need for transit pitches and provide the travelling community with a range of options. This approach may be particularly suitable for New Travellers who rely less on the need for permanent residential pitches.</u></p> <p><u>6.55a The Council will release land in its ownership and work with other public sector landowners to help ensure the need for both permanent and transit pitches is met. Opportunities will be considered through the DPD process, as well as bringing forward pitches in the short term through the planning application process.</u></p> <p><del>6.56 The council will use national policy and a criteria-based approach to identify the most suitable sites for Gypsy and Traveller pitches. A Gypsy and Travellers Site Allocation Development Plan Document will be prepared to add policy detail to the interpretation and implementation of Core Policy 47 and identify specific sites to deliver the pitch requirements set out within it<sup>(59)</sup>. Applications that are submitted before the DPD is prepared will</del></p>
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		<p><del>be assessed against the general criteria set in Core Policy 47.</del></p> <p><u>6.56 The Council is also carrying out a full Gypsy and Traveller Accommodation Needs Assessment to review and roll forward the pitch requirements in Core Policy 47 to ensure adequate pitch provision across the plan period. This review will inform amendments to the pitch requirements in Core Policy 47 to relate to the whole plan period and be included in the Gypsy and Traveller DPD. Core Policy 47 together with the policies and allocations proposed within the Gypsy and Traveller DPD will ensure continued compliance with national policy.</u></p> <p><del>6.57 In 2011, the government published a draft Planning Policy Statement<sup>(60)</sup> on planning for traveller sites which includes National policy<sup>63</sup>, as well as including the general principle of aligning planning policy on traveller sites more closely with that for other forms of housing. It requires the council to demonstrate a five year supply of pitches against a long term target based on clear evidence. Core Policy 47 reflects this approach by introducing a set of criteria against which potential sites will be tested and identifying a requirement for new pitches to 2021. The criteria have regard to local amenity, access to facilities and impact on the landscape in a similar way to policies for general housing. Appendix C provides the current position in relation to a 5 year supply of Traveller sites and demonstrates that, at the time of the CS examination, there was not a 5 year supply of traveller sites in Wiltshire. The programmed Gypsy and Traveller DPD will include specific deliverable sites to demonstrate a 5 year supply and a supply of specific developable sites or broad locations for growth for the remainder of the plan period.</del></p> <p><del>6.58 A review of the 2006 Gypsy and Traveller Accommodation Needs Assessment (GTAA) was undertaken in November 2011<sup>(61)</sup>. As a result a need for 44 additional residential pitches over the next five years (2011-2016) in Wiltshire has been identified. A projection of anticipated need between 2016-2021 has also been identified with approximately 38 residential pitches required. The review of need took into consideration the supply of permanent pitch provision since April 2006 (see Table 6.2 below) and evidence presented by the July 2011 caravan count. The preference in meeting need in the future is for small, private sites.</del></p>
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		<p>Core Policy 47</p>	<p>Table 6.1 Supply of permanent accommodation for Gypsies and Travellers, April 2006 to November 2011</p> <table border="1"> <thead> <tr> <th>Housing Market Area</th> <th>Permitted (April 06 to Nov-2011)</th> <th>With temporary permission Dec 11</th> <th>Applications pending Dec 11</th> </tr> </thead> <tbody> <tr> <td>North and West Wiltshire</td> <td><u>94</u></td> <td><u>2</u></td> <td><u>1</u></td> </tr> <tr> <td>South Wiltshire</td> <td><u>3</u></td> <td>2</td> <td><u>1</u></td> </tr> <tr> <td>East Wiltshire</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Total</td> <td><u>97</u></td> <td><u>4</u></td> <td><u>2</u></td> </tr> </tbody> </table> <p><b>Core Policy 47</b></p> <p>Meeting the needs of Gypsies and Travellers Provision should be made for <u>at least 66</u> <del>82</del> permanent pitches for Gypsies and Travellers, 25 transit pitches and 5 plots for Travelling Showpeople during the period 2011 to <del>2021</del>16. <u>A further 42 permanent pitches should be provided over the period 2016-2021.</u> Permanent and transit pitches should be distributed and phased as follows.</p> <p>Table 6.2</p> <table border="1"> <thead> <tr> <th>Housing Market Area</th> <th>Proposed Requirement (2011-16)</th> <th>Proposed Requirement (2016-2021)</th> <th>Transit provision 2011-2021</th> </tr> </thead> <tbody> <tr> <td>North and West Wiltshire</td> <td><del>9</del> <u>26</u></td> <td><del>20</del> <u>22</u></td> <td>10</td> </tr> <tr> <td>South Wiltshire</td> <td><del>33</del> <u>37</u></td> <td><del>17</del> <u>19</u></td> <td>8</td> </tr> <tr> <td>East Wiltshire</td> <td><del>2</del> <u>3</u></td> <td>1</td> <td>7</td> </tr> <tr> <td>Total</td> <td><del>44</del> <u>66</u></td> <td><del>38</del> <u>42</u></td> <td>25</td> </tr> </tbody> </table>	Housing Market Area	Permitted (April 06 to Nov-2011)	With temporary permission Dec 11	Applications pending Dec 11	North and West Wiltshire	<u>94</u>	<u>2</u>	<u>1</u>	South Wiltshire	<u>3</u>	2	<u>1</u>	East Wiltshire	0	0	0	Total	<u>97</u>	<u>4</u>	<u>2</u>	Housing Market Area	Proposed Requirement (2011-16)	Proposed Requirement (2016-2021)	Transit provision 2011-2021	North and West Wiltshire	<del>9</del> <u>26</u>	<del>20</del> <u>22</u>	10	South Wiltshire	<del>33</del> <u>37</u>	<del>17</del> <u>19</u>	8	East Wiltshire	<del>2</del> <u>3</u>	1	7	Total	<del>44</del> <u>66</u>	<del>38</del> <u>42</u>	25
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			<p>Proposals for new Gypsy and Traveller pitches or Travelling Showpeople plots/yards will only be granted where there is no conflict with other planning policies and where no barrier to development exists. New development should be situated in sustainable locations, with preference generally given to previously developed land or a vacant or derelict site in need of renewal. <u>Where Pproposals must satisfy the following general criteria they will be considered favourably:</u></p> <p>i. ....</p> <p><del>iv. it is located in or near to existing settlements within reasonable distance of a range of local services and community facilities, in particular schools and essential health services. This will be defined in</del>  detail in the methodology outlined in the Site Allocations DPD, and</p> <p><del>v. it will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings.</del></p> <p>iv. the site must also be large enough to provide adequate vehicle parking, including circulation space, along with residential amenity and play areas</p> <p>iv. it is located in or near to existing settlements within reasonable distance of a range of local services and community facilities, in particular schools and essential health services</p> <p>vi. it will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings <del>This will be defined in detail in the methodology outlined in the Site Allocations DPD, and</del></p> <p><u>vii. adequate levels of privacy should be provided for occupiers</u></p> <p><u>viii. development of the site should be appropriate to the scale and character of its surroundings and existing nearby settlements, and</u></p> <p><u>ix the site should not compromise a nationally or international recognised designation nor have the potential for adverse effects on river quality, biodiversity or archaeology</u></p> <p>In assessing sites for Travelling Showpeople or</p>
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			<p>where mixed-uses are proposed, the site and its surrounding context are suitable for mixed residential and business uses, including storage required and/or land required for exercising animals, and would not result in an unacceptable loss of amenity and adverse impact on the safety and amenity of the site's occupants and neighbouring properties.</p> <p>It is recommended that pre-application advice is sought on all proposals for new Gypsy and Traveller pitches or Traveller Showpeople plots/yards. Early engagement with the local community is recommended to ensure sites are developed sensitively to their context.</p> <p><del><b>Targets:</b> Net increase in pitches; Gypsy and Traveller site allocation DPD adopted.</del></p> <p><del><b>Monitoring and Review:</b> Number of approved Gypsy and Traveller pitches to be monitored through Wiltshire Monitoring Framework.</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council, strategic partnerships.</del></p>
MM 18	188	Core Policy 48	<p><b>Supporting rural life</b></p> <p><b>Dwellings required to meet the employment needs of rural areas</b></p> <p>Outside the defined limits of development of the Principal Settlements, Market Towns, Local Service Centres and Large Villages, and outside the existing built areas of Small Villages, proposals for residential development will <del>only</del> be supported where these meet the accommodation needs required to enable workers to live at or in the immediate vicinity of their place of work in the interests of agriculture or forestry or other employment essential to the countryside. <u>Proposals for accommodation to meet the needs of employment essential to the countryside should be supported by functional and financial evidence.</u></p> <p><b>Improving access to services and improving infrastructure</b></p> <p>Proposals which will focus on improving accessibility between towns and villages, helping to reduce social exclusion, isolation and rural deprivation, such as transport and infrastructure improvements, will be supported where the development will not</p>

	187	Para 6.63	<p>be to the detriment of the local environment or local residents.</p> <p><b><u>Conversion and re-use of redundant rural agricultural buildings</u></b></p> <p>Proposals to convert <u>and re-use redundant rural agricultural buildings</u> for employment, <del>and</del> tourism, <u>cultural and community</u> uses will be supported where it satisfies the following criteria:</p> <p>i. <del>the building(s) have architectural merit, is/are</del> structurally sound and capable of conversion without major rebuilding, and with only necessary <del>only modest</del> extension or modification which preserves the character of the original building; <u>and</u></p> <p>ii. <del>the reuse would lead to the viable long-term safeguarding of a heritage asset</del></p> <p>iii. the use would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas; <u>and</u></p> <p>iiiv. the building can be served by adequate access and infrastructure; <u>and</u></p> <p>iv. the site has reasonable access to local services; <del>and/or</del></p> <p>vi. <u>the conversion or re-use of a heritage asset would lead to its viable long term safeguarding.</u></p> <p><del>vi. the use meets identified local needs for employment.</del></p> <p><del>In exceptional circumstances, w</del>Where there is clear evidence that the above <del>employment or tourism</del> uses <del>can not be made viable</del> are not practical propositions, residential development may be appropriate where it meets the above criteria <del>and has reasonable access to employment.</del> <u>In isolated locations, the re-use of redundant or disused buildings for residential purposes may be permitted where justified by special circumstances in line with national policy.</u></p> <p>Proposals to convert <u>or re-use redundant</u> buildings for employment, tourism or residential uses, <u>community uses, meeting rooms or places of worship</u> will need to fulfil the requirements set out in Core Policy 48. <del>Local needs for employment or housing should be demonstrated through reference</del></p>
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			<p><del>to the Core Strategy evidence base or another credible evidence source. Proposals must not lead to subsequent applications for replacement buildings elsewhere. It is recognised that the insensitive re-use of rural buildings can be damaging to the character of the building and its rural setting. Furthermore, additions and extensions should normally be avoided.</del></p>
MM 19	190	Core Policy 49	<p><b>Protection of services and community facilities</b></p> <p>Proposals involving the loss of a community service or facility will only be supported where it can be demonstrated that the site/ building is no longer <u>economically</u> viable for an alternative community use. Preference will be given to retaining the existing use in the first instance, then for an alternative community use. Where this is not possible, a mixed use, which still retains a substantial portion of the community facility/service, will be supported. Redevelopment for non-community service/ facility use will only be permitted as a last resort and where all other options have been exhausted.</p> <p>In order for such proposals to be supported, a comprehensive marketing plan will need to be undertaken and the details submitted with any planning application. Only where it can be demonstrated that all preferable options have been exhausted will a change of use to a non-community use be considered.</p> <p>This marketing plan will, at the very minimum:</p> <ul style="list-style-type: none"> <li>i. be undertaken for at least 6 months</li> <li>ii. be as open and as flexible as possible with respect to alternative community use</li> <li>iii. establish appropriate prices, <u>reflecting local market value</u>, for the sale or lease of the site or building, which reflect the current or ...</li> </ul> <p><del><b>Targets:</b> Retention of existing facilities and services.</del></p> <p><del><b>Monitoring and Review:</b> Rural Facilities Survey and Wiltshire Monitoring Framework.</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council.</del></p>
MM 20	173	Core Policy 41	<p>....</p> <p><b>Climate change adaptation</b></p> <p>New development, building conversions, refurbishments and extensions will be encouraged to incorporate design measures to reduce energy demand. Development will be well insulated and</p>

			<p>designed to take advantage of natural light and heat from the sun and use natural air movement for ventilation, whilst maximising cooling in the summer. <del>This should be achieved by use of the following means as practicable:</del></p> <ul style="list-style-type: none"> <li><del>i. orientating windows of habitable rooms within 30 degrees of south and utilising southern slopes</del></li> <li><del>ii. locating windows at heights that allow lower sun angles in the winter and installing shading mechanisms to prevent overheating during summer months</del></li> <li><del>iii. using soft landscaping, including deciduous tree planting, to allow natural sun light to pass through during the winter months whilst providing shade in the summer</del></li> <li><del>iv. integrating passive ventilation, for example wind-catchers installed on roofs and</del></li> <li><del>v. planting green roofs to moderate the temperature of the building to avoid the need for mechanical heating and/or cooling systems.</del></li> </ul> <p><b>Sustainable construction</b></p> <p>New homes (excluding extensions and conversions) will be required to achieve at least Level 34 (in full) of the Code for Sustainable Homes, <del>progressing to Code Level 4 (in full) from 2013 and Level 5 (in full) from 20162.</del></p> <p>Conversions of property to residential use will not be permitted unless BREEAM's Homes "Very Good" standards are achieved.</p> <p>All non-residential development will be required to achieve the relevant BREEAM "Very Good" standards <del>from 2013</del>, rising to the relevant BREEAM "Excellent" standards from 2019.</p> <p><b>Existing buildings</b></p> <p>Retrofitting measures to improve the energy performance of existing buildings will be encouraged in accordance with the following hierarchy:</p> <ul style="list-style-type: none"> <li><del>vi. reduce energy consumption through energy efficiency measures</del></li> <li><del>vii. use renewable or low-carbon energy from a local/district source and</del></li> <li><del>viii. use building-integrated renewable or low-carbon technologies.</del></li> </ul> <p>Opportunities should be sought to facilitate carbon reduction through retrofitting at whole street or neighbourhood scales to reduce individual costs, improve viability and support coordinated programmes for improvement.</p>
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			<p><b>Renewable and low-carbon energy</b>  All proposals for major development will be required to submit a Sustainable Energy Strategy alongside the planning application outlining the low-carbon strategy for the proposal. <del>It is expected that proposals for larger scale residential development of 500 units or more will be viable to meet zero-carbon standards from 20134. Where this is not deliverable, the Sustainable Energy Strategy should clearly demonstrate why this is not achievable.</del></p> <p>In all cases, including those listed above, proposals relating to historic buildings, Listed Buildings and buildings within Conservation Areas and World Heritage Sites should ensure that appropriate sensitive approaches and materials are used. Safeguarding of the significance <del>the special character</del> of heritage assets should be in accordance with appropriate national policy and established best practice.</p> <p>In all cases the impact of these requirements on the viability of development will be taken into consideration  ....</p>
MM 21	175	Core Policy 42	<p><b>Standalone renewable energy installations</b>  Proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site specific constraints. In particular, proposals will need to demonstrate how impacts on the following factors have been satisfactorily assessed, <u>including any cumulative effects</u>, and taken into account ...</p> <p>...</p> <p>vii. residential amenity, including noise, odour, visual amenity, <u>safety and</u>  viii. <u>best and most versatile agricultural land</u></p>
MM 22	175	6.38	<p>The development of most standalone renewable energy installations within Wiltshire will require careful consideration due to their potential visual and landscape impacts, especially in designated or sensitive landscapes, including AONBs and the Stonehenge and Avebury World Heritage Site and its setting. Core policies 51 and 59, which relate to landscape and the World Heritage Site, should be considered alongside this policy. The size, location and design of renewable energy schemes should be informed by a landscape character assessment, alongside other key environmental issues as set out</p>

			<p>in Core Policy 42. This should help reduce the potential for conflict and delay when determining planning applications. <u>Cumulative effects should be addressed as appropriate.</u>  <u>Additional guidance will be prepared to support the implementation of Core Policy 42.</u> <del>to identify appropriate separation distances between wind turbines and residential premises in the interests of residential amenity, including safety. In the interim period, prior to the adoption of the guidance, the following minimum separation distances* will be applied:-</del>  <del>If the height of the wind turbine is-</del>  <del>(a) greater than 25m, but does not exceed 50m, the minimum distance requirement is 1000m;</del>  <del>(b) greater than 50m, but does not exceed 100m, the minimum distance requirement is 1500m;</del>  <del>(c) greater than 100m, but does not exceed 150m, the minimum distance requirement is 2000m;</del>  <del>(d) greater than 150m, the minimum distance requirement is 3000m</del>  <del>Shorter distances may be appropriate where there is clear support from the local community</del></p>
MM 23		6.67 on	<p><u>There is a network of identified wildlife sites:</u></p> <ul style="list-style-type: none"> <li>• <u>International – Special Areas of Conservation, Special Protection area and Ramsar Sites</u></li> <li>• <u>National – Sites of Special Scientific Interest and National Nature Reserves</u></li> <li>• <u>Local – County Wildlife Sites, Protected Road Verges and Local Geological Sites</u></li> </ul> <p><u>Proposed development on land within or outside a SSSI likely to have an adverse effect on the SSSI will be determined in accordance with the requirements of paragraph 118 of the NPPF and Circular 06/2005.</u>  <del>Wiltshire's natural environment is one of its greatest assets and includes a particularly large proportion of the UK's biodiversity, including some of Europe and the UK's most significant sites which are protected by national policy and statutory legislation (and therefore not generally addressed in this core strategy). However the</del> <u>The</u> <del>valuable</del> natural environment includes not only identified <del>protected sites, but also local sites such as County Wildlife Sites, Protected Road Verges and Local Geological Sites, and other features of nature conservation value including:</del>  <ul style="list-style-type: none"> <li>• <u>Priority species and habitats of conservation concern</u> (including those listed on the national and Wiltshire Biodiversity Action Plans)</li> <li>• <u>areas of habitat with restoration potential</u></li> </ul> </p>



			<p>(particularly those identified on the South West Nature Map or through other landscape scale projects) and</p> <ul style="list-style-type: none"> <li>• <u>all waterbodies covered under the Water Framework Directive</u> and</li> <li>• features providing an ecological function for wildlife such as foraging, resting and breeding places, particularly wildlife corridors of all scales which provide ecological connectivity allowing species to move through the landscape and support ecosystem functions.</li> </ul> <p>•</p> <p><u>For the purposes of ecological impact assessment, the value of undesignated habitats and species should be measured against published selection criteria (footnote) where possible(footnote), however statutory protection will only ever apply to those sites which have been formally notified by Natural England.</u></p> <p><u>(Insert footnotes as indicated).</u></p> <p>6.68 Collectively these sites and natural features make up the local ecological networks necessary to underpin and maintain a healthy natural environment. Core Policy 50 seeks to ensure protection and enhancement of these sites and features, and is necessary to help halt and reverse current negative trends and meet new challenges particularly from climate change adaptation and pressures associated with the increasing population.</p> <p><u>Protection</u>  <u>It is vital that all stages of sustainable development are informed by relevant ecological information, from site selection and design to planning decisions and long-term management. All effects should be considered, including positive and negative, direct and indirect, cumulative, and on and offsite impacts over the lifetime of the development (including construction, operation and restoration phases), also giving consideration to disturbance effects such as noise, lighting, recreational pressures, trampling, traffic, domestic pets, vandalism etc.</u></p> <p><del>6.69 It is vital that all stages of sustainable development are informed by relevant ecological information, from site selection and design to planning decisions and long-term management. All effects should be considered, including positive and negative, direct and indirect, cumulative, and on and offsite impacts over the lifetime of the</del></p>
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		<p>development (including construction, operational and restoration phases), also giving consideration to disturbance effects such as noise, lighting, recreational pressures, trampling, traffic, domestic pets, vandalism etc. All effects upon the natural environment should be addressed sequentially in accordance with the principle of the 'mitigation hierarchy':</p> <ul style="list-style-type: none"> <li>• avoid e.g. site location, buffers</li> <li>• reduce, moderate, minimise</li> <li>• rescue e.g. translocation</li> <li>• repair, reinstate, restore</li> <li>• compensate or offset.</li> </ul> <p>6.70 Compensation is a last resort, but will be necessary in some instances where other approaches cannot guarantee 'no net loss' of biodiversity and any unavoidable losses are outweighed by other sustainability considerations. Such measures should be delivered within the development site where possible; however where this is not feasible it may be more appropriate to deliver offsite measures through legal agreements and landscape scale projects. Appropriate compensatory measures should demonstrate no net loss of the relevant local biodiversity resource in the short and long-term, and be delivered as close to the development site as possible to avoid the degradation of local ecological networks or 'ecosystem services'<sup>(625)</sup>. <u>Additional guidance is available to help clarify appropriate ecological avoidance, mitigation and compensation measures to demonstrate compliance with Core Policy 50, which should be proportionate to the scale of any predicted impact.</u></p> <p><u>A number of strategic mitigation plans and guidance documents are also available to ensure that the most commonly occurring effects upon international sites can be avoided as efficiently and effectively as possible:</u></p> <ul style="list-style-type: none"> <li>• <u>The Stone Curlew Management Strategy – applicable to residential development within distances up to 15km of Salisbury Plan</u></li> <li>• <u>Wiltshire Bats SAC Planning Guidance – applicable to all development types in the areas within and surrounding Bradford on Avon, Box, Colerne, Corsham, Trowbridge, Westbury, Fonthill and Chilmark.</u></li> <li>• <u>River Avon Planning Guidance – applicable to any new development in proximity to the Salisbury Avon, or major development within</u></li> </ul>
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			<p><u>the wider catchment.</u></p> <ul style="list-style-type: none"> <li>• <u>The New Forest recreation Management Strategy – applicable to residential development within distances up to 9km of the New forest National Park. Other plans and guidance documents will be produced by Wiltshire Council as necessary. Wiltshire Council has also signed a Memorandum of Understanding with Natural England to ensure that all of these measures are effectively delivered.</u></li> </ul> <p><u>Wiltshire Council will support production and implementation of a New Forest Mitigation Strategy, in partnership with Natural England, and other partners as appropriate. This will set out the delivery mechanisms and funding requirements (either through CIL, S106 or other appropriate mechanism) such that the impacts of the Plan upon the New Forest SPA are fully mitigated. After adoption the New Forest Mitigation Strategy will be relevant in relation to Para 6.70 above. Prior to this, planning applications will be subject to individual Habitats Regulation Assessments and bespoke mitigation secured as necessary</u></p> <p>6.71 Sustainable development also provides opportunities to enhance the natural environment for wildlife and Wiltshire's communities, particularly through landscaping, public open space, Sustainable Urban Drainage Systems and features of the built environment e.g. bird and bat boxes. Such measures should contribute to delivery of relevant Biodiversity Action Plan (BAP) <u>targets and River basin/Catchment Management Plan objectives</u>, but also be tailored to local landscape character (see Core Policy 51). Development may also open up opportunities to bring degraded or neglected features back into favourable condition through sensitive management to encourage wildlife; such restoration will be particularly valuable where it contributes towards <u>landscape scale projects Nature Improvement areas or other landscape scale projects identified by the Local Nature Partnership or objectives in relevant River Basin/Catchment Management Plans</u>. Additional guidance will be produced to <u>aid the design and incorporation of suitable ecological</u> <del>help clarify appropriate avoidance, mitigation, compensation</del> <u>and</u> enhancement measures to demonstrate compliance with Core Policy 50, which should be proportionate to the scale of development.</p>
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			<p>[Footnote625 Ecosystem services are best defined through the work of the UK National Ecosystem Assessment <a href="http://uknea.unep-wcmc.org/">http://uknea.unep-wcmc.org/.</a>]</p> <p><del>6.72 Compensation for increased recreational disturbance at Special Protection Areas (SPAs) will be achieved through securing management in those areas. For development within 15km of Salisbury Plain this will best be achieved through the Wessex Stone Curlew Project (WSCP), which delivers targeted advice to the Ministry of Defence and private tenants on the location and management of Stone Curlew nest sites. For development within 7km of the New Forest SPA mitigation will be best addressed through the Recreation Management Strategy (RMS) for the area. Proportionate developer contributions toward implementation of the WSCP and the RMS will be sought in line with Core Policy 3 (infrastructure) and the Infrastructure Delivery Plan. The use of Suitable Alternative Natural Greenspace (SANGs) is unlikely to be successful for attracting people away from these sites given their high intrinsic appeal and unique characteristics, and would only be acceptable in cases where a particularly large or high quality SANGs can be secured. However in most cases this is unlikely to be cost effective. Wiltshire Council is developing guidance for development surrounding the Bath and Bradford Bats SAC and associated roost sites. This will include guidance for developers and planners, and a procedure to ensure that any likely significant effects upon the SAC are identified and assessed at the application stage. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.</del></p> <p><del>Local sites</del>  Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:</p> <ul style="list-style-type: none"> <li><del>i. cannot reasonably be avoided</del></li> <li><del>ii. are reduced as far as possible</del></li> <li><del>iii. are outweighed by other planning considerations in the public interest and</del></li> <li><del>iv. where appropriate compensation measures can</del></li> </ul>
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		<p>Core Policy 50</p>	<p><del>be secured through planning obligations or agreements.</del>  <del>Development proposals affecting local sites must contribute to their favourable management in the long-term.</del></p> <p><b>Protection</b>  Development proposals must demonstrate how they protect, <del>and where possible enhance</del>, features of nature conservation and geological value as part of the design rational. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.</p> <p><u>All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.</u></p> <p><u>Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in Paragraph 6.70 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.</u></p> <p><b>Biodiversity enhancement</b>  All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) <u>or River basin/ Catchment Management Plan</u>, particularly through landscape scale projects, and be relevant to the local landscape character.</p>
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		<p><b>Disturbance</b>  <del>All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. Development likely to increase recreational pressure on Special Protection Areas (SPAs) will be required to deliver an appropriate level of mitigation to offset any potential impacts. Suitable mitigation strategies will include securing management measures for designated features of Salisbury Plain, New Forest National Park and surrounding areas. Designated features include Habitats Directive Annex I habitats and Annex II species. Provision of an appropriate area of Suitable Alternative Natural Greenspace to deter public use of Natura 2000 sites will only be acceptable in exceptional circumstances. Such measures shall be secured through reasonable and proportionate planning obligations and agreements.</del></p> <p><u>Local Sites</u>  <u>Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:</u></p> <ol style="list-style-type: none"> <li>i. <u>cannot be reasonably avoided</u></li> <li>ii. <u>are reduced as far as possible</u></li> <li>iii. <u>are outweighed by other planning considerations in the public interest and</u></li> <li>iv. <u>where appropriate compensation measures can be secured through planning obligations or agreements</u></li> <li>v. <u>Development proposals affecting local sites must make a reasonable and proportionate contribution to their favourable management in the long-term.</u></li> </ol> <p><b>Targets:</b> No net loss of biodiversity through development.  <b>Monitoring and review:</b> Percentage of consented applications affecting nature conservation features for which an ecological mitigation/management plan is i) secured through condition and ii) implemented.  To be monitored through Wiltshire Monitoring Framework.  <b>Delivery responsibility:</b> Wiltshire Council, development industry.</p>
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MM 24	197	Para 6.88	<p>Development will need to make provision for accessible open spaces (such as parks, play areas, sports pitches and allotments) in accordance with the adopted Wiltshire Open Space Standards. Four sets of open space standards are currently in operation across Wiltshire, with different standards applying in each of the former district areas, and these currently form the Wiltshire Open Space Standards. A new set of standards will be developed to provide a consistent approach across Wiltshire. Once adopted, these Wiltshire-wide standards will be used on a case by case basis to determine the amount and type of open space provision that will be required to accompany new development. The open space standards covering the former district areas will be used for the purposes of Core Policy 52 until such time as the new Wiltshire-wide standards are adopted. <u>The Wiltshire-wide standards are currently being produced and will be informed by an Open Spaces Study, to be completed by 2015, with the new standards adopted as part of the Partial Review of the Wiltshire Core Strategy in 2016.</u></p>
MM 25	199	Core Policy 53	<p>Core Policy 53  <del>Wiltshire's and Berks and Thames and Severn canals</del></p>
MM 26	204	Core Policy 55	<p>Core Policy 55  <b>Air Quality</b>  Development proposals which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of the Air Quality Strategy for Wiltshire and <u>where relevant, the Wiltshire Air Quality Action Plan. Mitigation may include:</u></p> <ul style="list-style-type: none"> <li>i. landscaping, bunding or separation to increase distance from highways and junctions</li> <li>ii. possible traffic management or highway improvements to be agreed with the local authority</li> <li>iii. abatement technology and incorporating site layout / separation and other conditions in site planning</li> <li>iv. traffic routing, site management, site layout and phasing; and</li> <li>v. <u>where appropriate, contributions will be sought</u></li> </ul>

			<p><u>toward the mitigation of the impact a development may have on levels of air pollutants</u></p> <p><del><b>Targets:</b> No applications permitted contrary to the advice of Wiltshire Council on the grounds of air pollution that cannot be mitigated.</del></p> <p><del><b>Monitoring and Review:</b> Air Quality Strategy Implementation Plan.</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council</del></p>
MM 27	225	Core Policy 68	<p>Water Resources</p> <p>Development must not prejudice the delivery of the actions and targets of the relevant River Basin <u>or Catchment</u> Management Plan, and should contribute towards their delivery where possible. Non-residential development will be required to incorporate water efficiency measures. Developers will be expected to submit details of how water efficiency has been taken into account during the design of proposals.</p> <p>Development proposals within a Source Protection Zone, Safeguard Zone or Water Protection Zone must assess any risk to groundwater resources, <u>and groundwater quality</u> and demonstrate that these would be protected throughout the construction and operational phases of development.</p> <p><del><b>Targets:</b> Incorporation of water efficiency measures in all non-residential development.</del></p> <p><del><b>Monitoring and Review:</b> To be monitored through the Wiltshire Monitoring Framework.</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council.</del></p>
	225	Para 6.176	<p>.....The catchment covers over half the county and the river and its tributaries flow through many of Wiltshire's towns and villages. Development <u>within the catchment</u> <del>in close proximity to the river</del> has the potential to have a detrimental effect upon its qualifying features through direct damage, .....</p>
	227	Core Policy 69	<p><b>Protection of the River Avon SAC</b></p> <p>In order to avoid and reduce potential environmental effects on the River Avon SAC, development will need to incorporate measures during construction and operation to avoid and prevent pollution and mitigate potential disturbance effects; appropriate <del>schemes of mitigation</del> <u>measures</u> may include consideration of suitable buffer zones along watercourses, habitat enhancements and river access management measures. All development within 20m of the river banks should submit a Construction Management Plan to the Local Planning Authority to ensure</p>



			<p>measures proposed during construction are satisfactory.</p> <p>Where additional sewage discharges to a STW cannot be accommodated without measures to offset phosphate loading, development will be required to undertake proportionate <del>mitigation</del> measures <u>(which may include contributions towards those measures identified in the Nutrient Management Plan)</u> to demonstrate that the proposals would have <u>no likely significant adverse effects</u> upon the SAC.</p> <p><del><b>Targets:</b> All development to be in compliance with the policy.</del></p> <p><del><b>Monitoring and Review:</b> To be monitored through the Wiltshire Monitoring Framework.</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council.</del></p>
MM 28	207	<p>Para 6.126</p> <p>Core Policy 57</p>	<p>High quality design will be required for all new developments from building extensions through to major developments. <u>Innovative designs which help raise the standard of design more generally in the area will be encouraged.</u> This policy sets out a range of issues which all developers will need to take into account when designing each individual scheme. Proposals will need to be accompanied by appropriate information to demonstrate compliance with Core Policy 57, including a design and access statement when this is required by the Local Validation Checklist<sup>(662)</sup>. All proposals will need to have regard to relevant supplementary guidance on design, <u>this includes Village Design Statements that are up to date and approved by the local authority as providing guidance on the implementation of policy CP57 for a local area</u></p> <p>...</p> <p>ix. ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, <u>safe and accessible; in accordance with Core Policy 66 – Strategic Transport Network.</u> ...</p> <p>....</p> <p>xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and <del>public art where</del> <u>appropriate the integration of art and design in the public realm</u></p> <p>....</p> <p>Xiv: <u>meet the requirements of Core Policy 61 – Transport and New Development</u></p>

			<p><del><b>Targets:</b> High standard of design achieved in all new developments.</del></p> <p><del><b>Monitoring and review:</b> To be monitored through the Wiltshire Monitoring Framework.</del></p> <p><del><b>Delivery responsibility:</b> Wiltshire Council.</del></p>
MM 29	209	Para 6.132	<p>It is anticipated that additional planning guidance will be developed <del>which will include</del> to aid in the application of Core Policy 58. <u>The anticipated Heritage Guidance will provide details on heritage issues in Wiltshire; including the endorsement of establishing a new local heritage list in line with English Heritage's Good Practice Guidance (May 2012)**.</u></p>
		Para 6.135	<p>The Council will continue to keep under review Conservation Areas <del>in the District</del> and where appropriate, designate new areas. Appraisals of Conservation Areas will define the boundaries and analyse the special architectural and historic interest of the area. <u>A component of the Plan's positive strategy for the conservation of heritage assets at risk will include the joint Wiltshire Council / English Heritage Monument Management Scheme.</u></p>
		Para 6.136	<p>The individual area strategies identify specific distinct heritage assets, conservation challenges, and where appropriate, specific opportunities. <u>Information in the Area Strategies and Development Templates should be supported by mitigation measures and information identified in evidence documents such as: The Historic Landscape Assessment, January 2012 and Salisbury Historic Landscape Assessment 2009. The Anticipated Heritage Guidance referred to in 6.132 above will also provide further supporting information.</u></p>
		Core Policy 58	<p><b>Ensuring the conservation of the historic environment</b></p> <p>Development should protect, conserve and where possible enhance the historic environment., <del>and should not have an unacceptable impact on the historic environment, particularly where this could be avoided or mitigated.</del></p> <p>Designated <del>historic heritage</del> assets and their settings will be conserved, and where appropriate enhanced, <u>in a manner appropriate to their significance including:</u></p> <p>i. <u>nationally significant</u> archaeological remains <del>and their setting</del></p>

		<p>ii. <del>the</del> World Heritage Sites <u>within and adjacent to Wiltshire</u></p> <p>iii. buildings and structures of special architectural or historic interest <del>and their settings</del></p> <p>iv. the special character or appearance of conservation areas <del>and their settings</del></p> <p>v. historic parks and gardens <del>and their setting</del></p> <p>vi. important landscapes <u>including registered battlefields</u> and townscapes.</p> <p><del>Development will be required to conserve and seek opportunities to enhance structures and areas of heritage significance throughout Wiltshire, including the character, setting and cultural significance of designated and other locally or regionally significant non-designated heritage assets, including:</del></p> <p><del>vii. the sensitive re-use of redundant and under-used historic buildings and areas which are consistent with their conservation especially in relation to the viable re-use of heritage assets at risk</del></p> <p><del>viii. opportunities to enhance Wiltshire's historic public realm by ensuring that all development, including transport and infrastructure work, is sensitive to the historic environment</del></p> <p>Distinctive elements of Wiltshire's historic environment, <u>including non-designated heritage assets</u>, which <del>creates</del> <u>contribute to</u> a sense of local character and identity <del>and variation across the county</del>, will be conserved, <u>and where possible enhanced</u>. <del>and their</del> The potential <u>to contribution of these heritage assets</u> towards wider social, cultural, economic and environmental benefits will <u>also be exploited, including: utilised where this can be delivered in a sensitive and appropriate ,manner in accordance with core policy 57.</u></p> <p><del>ix. the individual and distinctive character and appearance of Wiltshire's historic market towns and villages</del></p> <p><del>x. nationally significant prehistoric archaeological monuments and landscapes</del></p> <p><del>xi. the Stonehenge and Avebury World Heritage Site</del></p> <p><del>xii. historic buildings and structures related to the textile industry</del></p> <p><del>xiii. historic rural structures including threshing barns, granaries, malt houses, dovecots and stables</del></p> <p><del>xiv. ecclesiastical sites including churches, chapels and monuments</del></p> <p><del>xv. the historic Great Western Railway and associated structures</del></p>
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			<p><del>xvi. the historic waterways and associated structures including canals and river courses</del>  <del>xvii. heritage assets associated with the military.</del></p> <p><u>Buildings Heritage assets at risk will be monitored and development proposals that improve their condition secure and improve buildings at risk will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications.</u></p> <p><b>Targets:</b> <del>No increase in Buildings at Risk (BAR), no loss of listed buildings.</del></p> <p><b>Monitoring and Review:</b> <del>To be monitored through the Wiltshire Monitoring Framework.</del></p> <p><b>Delivery Responsibility:</b> <del>Wiltshire Council.</del></p>
MM 30	214	6.137 on	<p>Wiltshire's World Heritage Site (WHS) is a designated heritage asset of the highest international and national significance. The United Kingdom, as a signatory to the Convention Concerning the Protection of the World Cultural and Natural Heritage (UNESCO, 1972) is obliged to protect, conserve and, present <u>and transmit to future generations its WHSs which, because of their exceptional qualities are considered to be of the Outstanding Universal Value (OUV) of the World Heritage Site and ensure that it is transmitted to future generations. This obligation should therefore be given precedence in decisions concerning</u> <del>on</del> development management <u>in the WHS.</u> World Heritage Site status offers the potential of considerable social and economic gains for Wiltshire in areas such as sustainable tourism however this will require careful and sensitive management <u>in order to protect the Site and sustain its OUV of the Site.</u></p> <p>6.138 The Stonehenge, Avebury and Associated Sites World Heritage Site was inscribed on the UNESCO World Heritage list in 1986 for its OUV, Since that time, a Statement of Significance (see Stonehenge Management Plan 2009 pp26-27) and a draft Statement of OUV for the WHS have been drawn up. <del>comprising its significance, authenticity and integrity.</del> The <del>OUV of the</del> World Heritage Site requires protection and where appropriate enhancement in order to sustain its OUV. Not all aspects of the Site contribute to OUV and the UNESCO Statements of Significance and OUV as well as the World Heritage Site Plans for Stonehenge and Avebury are a critical</p>

		<p>resource in reaching decisions relating to the significance of its elements-for identification of the attributes of OUV as well as other important aspects of the WHS, and for reaching decisions on the effective protection and management of the Site</p> <p>6.139 In summary, the World Heritage Site is internationally important for its complexes of outstanding prehistoric monuments. The two stone circles at Stonehenge and Avebury, together with inter-related monuments, and their associated landscapes, demonstrate Neolithic and Bronze Age ceremonial and mortuary practices <del>from around</del> through 2,000 years of continuous use and monument building. The excellent survival of monuments provides evidence of the creative and technological achievements of the period. Their careful <del>siting</del> design in relation to the astronomical alignments, topography and other monuments provides further insight while their continuing prominence today underlines how this period of monument building shaped the landscape. The World Heritage Site is a landscape without parallel at a national and international level and one of Wiltshire's highest quality environments.</p> <p>6.140 The setting of the World Heritage Site beyond its designated boundary also requires protection as inappropriate development here can have an adverse impact on the Site and its attributes of OUV <del>of the Site</del>. The setting is the surrounding in which the World Heritage Site is experienced. It includes a range of elements such as views and historical, landscape and cultural relationships. The setting of the World Heritage Site is not precisely defined and will vary depending on the nature and visibility of the proposal. A future setting study will provide further information and a preferred methodology for the assessment of proposed development for its potential impact on the Site and its attributes of OUV. Light pollution and skyglow which could adversely affect the OUV of the site must be adequately addressed through the careful management of development.</p> <p>6.141 The World Heritage Site consists of two areas of approximately 25 square kilometres centred on Stonehenge and Avebury. Each area has its own discrete landscape setting. Core Policy 59 covers both halves of the World Heritage Site which have similar requirements for protection and enhancement. Saved local plan policies (policies</p>
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		<p>TR6, TR8 and TR9 of the Kennet Local Plan 2011) and Core Policy 6 (Stonehenge) reflect the specific local context, opportunities and challenges for the different halves of the World Heritage Site. <del>It</del> <del>an</del> <del>Additional</del> separate management plans set out strategies and actions needed for the successful conservation and management of the <u>site in order to sustain its OUV, taking account of and of the site alongside other relevant values and interests</u> including tourism, farming, nature conservation, research, education and the quality of life of the community. These management plans are a key material consideration in the planning process, which has a major role in their implementation. Indicators to monitor the implementation of the actions identified appear in both management plans.</p> <p>6.142 In considering Core Policy 59 particular reference should be made to the statement of OUV for the World Heritage Site and the relevant World Heritage Site Management Plan<sup>(6770)</sup>. Applicants will be required to demonstrate that full account has been taken of the impact of the proposals upon the World Heritage Site and its setting and that those proposals will have no adverse effects upon <u>the site and its attributes of OUV</u>. Development proposals which fall within the World Heritages Site boundary, or potentially impact upon its setting, should convey this accountability principally within the design and access statement related to the proposal.</p> <p>6.143 Due consideration should be given to environmental impact assessment (EIA) regulations which list World Heritage Sites as among the 'sensitive areas' where lower thresholds apply to the assessment of the need for EIA. The recent ICOMOS guidance on heritage impact assessments for Cultural World Heritage Properties (2010) offers advice on the process of historic impact assessment (HIA) for cultural World Heritage Sites which is designed to assess impact on the <u>WHS and its attributes of OUV</u><sup>(6871)</sup>.</p> <p>6.144 Additional planning guidance will be developed to help ensure the effective implementation of Core Policy 59<sup>(6972)</sup>. Based on the management plans and additional studies required, additional guidance will assist in articulating the spatial implications of protecting and enhancing <u>the World Heritage Site and its setting in order to sustain its</u></p>
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		<p>Core Policy 59</p>	<p>OUV both within the World Heritage Site and its setting. This will include considering the use of <u>further</u> Article 4 Directions to address permitted development rights that may have an adverse effect on <u>the WHS and its attributes of OUV</u>.<sup>67</sup></p> <p><b>Core Policy 59</b>  <b>The Stonehenge, Avebury and associated sites World Heritage Site</b>  The Outstanding Universal Value (OUV) of the World Heritage Site <del>and its setting</del> will be <u>sustained protected and enhanced</u> by:</p> <ul style="list-style-type: none"> <li>i. giving precedence to the protection of the <del>OUV of the</del> World Heritage Site and its setting</li> <li>ii. development not adversely affecting <del>the OUV of the</del> World Heritage Site, <u>and its attributes of OUV, significance, authenticity or integrity, or its setting</u>. This includes the physical fabric, character, appearance, setting or views into or out of the World Heritage Site</li> <li>iii. seeking opportunities to support and <u>maintain sustain</u> the positive management of <del>the OUV of the</del> World Heritage Site through development that delivers improved conservation, presentation and interpretation and reduces the negative impact of <u>roads</u>, traffic and visitor pressure</li> <li>iv. requiring developments to demonstrate that full account has been taken of their impact upon the <del>OUV of the</del> World Heritage Site and its setting. Proposals will need to demonstrate that the development will have no individual, cumulative or consequential adverse <del>effect</del> <u>effect</u> upon the <u>site and its OUV</u>. Consideration of <u>opportunities for enhancing the World Heritage Site and sustaining its OUV</u> should also be demonstrated. This will include proposals for climate change mitigation and renewable energy schemes.</li> </ul> <p><del><b>Targets:</b> Progress towards objectives of the adopted WHS Management Plans.</del>  <del><b>Monitoring and Review:</b> WHS Co-ordinators.</del>  <del><b>Delivery Responsibility:</b> Wiltshire Council.</del></p> <p>(Inspector's Note:  Throughout the CS, especially in the supporting text to Core Policy 59, reference should be made consistently to the need to sustain the OUV of World Heritage Sites.)</p>
<p>MM 31</p>	<p>43</p>	<p>Core Policy 4</p>	<p>...  Small Villages: Allington, Berwick St James, Cholderton, Figheldean, /Ablington, Gomeldon/<u>East Gomeldon</u>/West Gomeldon ...  ...</p>

		<p>Paragraph 5.18</p>	<p>Over the plan period (2006 to 2026) 17 ha of new employment land and <u>approximately at least 2,395 2785</u> new homes will be provided. <u>About 2,440 2,100</u> should occur at Amesbury (including Bulford and Durrington) including land identified at Kings Gate, Amesbury for strategic growth. ...</p> <p>...</p> <p><del>295</del> <u>Approximately 345</u> homes will be provided in the rest of the community area. <del>Non-strategic development-Growth</del> in the Amesbury Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2. ...</p> <p>Additional text:  <u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Amesbury Community Area this includes the Cranborne Chase &amp; West Wiltshire Downs Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p>
<p>MM 32</p>		<p>Core Policy 5</p>	<p>One specific issue in relation to which co-ordination is required is wildlife management. The Council will thus work with all relevant interests to produce an Integrated Business and Environmental Strategy (IBEMS) for the Porton Down SAC, SPA and SSSI and the non-designated areas of the site that will be adopted as a Supplementary Planning Document. The IBEMS will seek to balance the existing and future economic and scientific significance of the site with safeguarding important nature conservation interests, <del>together with</del> <u>while</u> enhancing biodiversity across the Porton Down site. In order to facilitate future development, the IBEMS will identify future proposed development, <u>in generic terms, a broad timescale and high level assessment of impacts and demonstrate</u> <del>when this</del> <u>how these potentially adverse will take place, the broad impacts will be avoided of this development and how (if possible) these impacts can be mitigated.</u></p> <p>Proposals submitted in advance of the IBEMS being adopted as SPD, and stand alone projects not addressed in the IBEMS will <u>likewise</u> need to adequately demonstrate that either alone or in combination with other plans or projects, they do not have <u>an adverse effect significant impact</u> on the integrity of the Porton Down SPA, SAC or SSSI, <del>or</del></p>



			<p><del>that if they do adequate mitigation will be provided to ensure no adverse effect on site integrity.</del></p> <p><del><b>Targets:</b> % habitat at Porton Down in favourable condition. Specific species monitoring. Percentage of planning applications granted on the Porton Down site which contribute to the objectives of the IBEMS (target 100%).</del></p> <p><del><b>Monitoring and Review:</b> AMR, IBEMS when approved.</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council, DSTL, HPA, PBTC, Natural England, species specific organisations e.g. RSPB, BTO, Plantlife, Butterfly Conservation.</del></p>
MM 33	46	Core Policy 6	<p>Stonehenge</p> <p><u>The World Heritage Site and its setting will be protected so as to sustain its Outstanding Universal Value in accordance with Core Policy 59.</u></p> <p>New visitor facilities will be supported where they:</p> <ol style="list-style-type: none"> <li>i. return Stonehenge to a more respectful setting befitting its World Heritage Site status</li> <li>ii. include measures to mitigate the negative impacts of the roads</li> <li>iii. introduce a greatly enhanced visitor experience in a high quality visitor centre</li> <li>iv. implement an environmentally sensitive method of managing visitors to and from Stonehenge</li> <li>v. include a tourist information element, which highlights other attractions and facilities on offer in the surrounding area and raises the profile of Wiltshire.</li> </ol> <p><del><b>Targets:</b> Successful implementation of a new scheme by the London Olympics in 2012.</del></p> <p><del><b>Monitoring and Review:</b> AMR.</del></p> <p><del><b>Delivery Responsibility:</b> English Heritage, National Trust, Wiltshire Council and partners.</del></p>
MM 34	50	Core Policy 7 (3 <sup>rd</sup> paragraph onwards)	<p>...</p> <p>Over the plan period (2006-2026) 2 to 3 ha of new employment land (in addition to that already delivered or committed <u>at April 2011</u>) <u>will be provided and at least 670 approximately 780</u> new homes will be provided. <del>510</del> <u>About 510-595</u> dwellings should occur at Bradford on Avon, including land identified to the east of Bradford on Avon on land at Kingston Farm for strategic growth.</p> <p>...</p>

		Paragraph 5.35	<p>...  <del>160</del> <u>Approximately 185</u> homes will be provided in the rest of the community area. <del>Non-strategic development</del><u>Growth</u> in the Bradford on Avon Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>Development proposals in the Bradford on Avon Community Area will need to demonstrate how <u>the relevant</u> <del>these</del> issues and considerations listed in paragraph 5.36 will be addressed</p> <p>Additional text:  <u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Bradford on Avon Community Area this includes the Cotswolds Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p>
MM 35	57	Paragraph 5.48 4 <sup>th</sup> bullet  Additional bullet	<p>... securing expansion to Chippenham's town centre <u>by providing additional convenience floorspace of 703sq m net by 2015 rising to 1338 sq m net by 2020 and an additional 3181 sq m net comparison floorspace rising to 7975 sq m net by 2020 to include</u> and improved retail offer through redevelopment of the Bath Road Car Park/ Bridge Centre <u>which is</u> a priority along with redevelopment of other smaller town centre brownfield sites.</p> <p><u>A more detailed Strategic Flood Risk Assessment (Level 2) is needed to provide a robust understanding of flood risk and inform decisions about the town's growth and appropriate selection of sites for development. Such work should consider all aspects of flood risk and, where practicable, the scope of the assessment should be agreed with the Council and the Environment Agency</u></p>
MM 36	56	5.47	<p><b>The Strategy for the Chippenham Community Area</b></p> <p>The strategy for Chippenham is based on delivering significant job growth, which will help to improve the self-containment of the town by providing more jobs for local people. To ensure employment is accessible to the local population a sustainable distribution and choice of employment sites will be</p>

		<p>and new Para 5.47 a</p> <p>5.53</p> <p>New paras 5.54a 5.54b and 5.54c</p>	<p>provided at the town. They will form part of mixed use urban extensions, incorporating housing, that are well integrated with the town. Currently, the limited opportunities for the redevelopment of brownfield sites in Chippenham means that it is necessary to identify greenfield sites on the edge of town. <del>Proposed strategic and employment allocations to the south of Chippenham are to support the spatial strategy of Chippenham but are located within the Corsham Community Area. The strategy will respond to the Community Area's location (in full or part) within a national designated landscape. In Chippenham Community Area this includes the Cotswold Area of Outstanding National Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</del></p> <p><u>Strategically important mixed use sites for the town's expansion will be identified in a Chippenham Site Allocations Development Plan Document.</u></p> <p>The council is <u>working</u> with developers to ensure viable and comprehensive site solutions are delivered, which will secure investment in Chippenham. The nature of development to come forward on these sites will be determined in accordance with the key principles set out below and Core Policy 9. A Chippenham Central Area Master Plan will be developed to provide a more detailed framework for the delivery of <u>alternative additional</u> regeneration opportunity sites. If appropriate, this will be adopted as a Supplementary Planning Document (SPD) or via an alternative planning mechanism. <u>Specific development proposals arising from the Chippenham Central Area Masterplan will be included in the scope of the proposed Chippenham Site Allocations DPD</u></p> <p><b>Strategic Approach to New Development in Chippenham</b></p> <p><u>Core Policy 10 identifies a need to identify at least a further 2625 dwellings (once existing completions and commitments have been taken into account) and 26.5<sup>151</sup>ha of land for employment development on land adjoining the built up area. The Chippenham Site Allocation DPD will identify mixed</u></p>
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<sup>151</sup> Showell Farm employment site, Chippenham is not included as a site with planning permission

		<p>Core Policy 10</p>	<p><u>use land opportunities necessary to deliver at least this scale of growth. In this context there are a number of strategic areas where large mixed use sites could be located and directions for growth are shown diagrammatically below:</u></p> <p>(Insert indicative diagram with broad strategic areas for growth - see Appendix C of EXAM/90)</p> <p><u>These broad 'strategic areas' for growth are indicated by barriers such as main roads, rivers and the main railway line. The A350 may be considered as one such barrier to development. The Chippenham Site Allocations DPD will assess how each of these areas performs against criteria contained in Core Policy 10.</u></p> <p><u>These criteria address relevant issues identified in paragraph 5.48. The DPD will identify a strategic site or sites and, applying these criteria and all other policies of the Plan, will focus first on the area that is best able to deliver growth. Preparation of the DPD will assess the viability and capacity to deliver infrastructure necessary to serve the needs created by new development and where possible contribute (cumulatively with other developments) to solving strategic infrastructure problems facing the Town. Areas will be considered sequentially on a similar basis and by these means the growth of Chippenham can be best directed to support the town's economic growth, resilience and quality of its environment.</u></p> <p><b>The Spatial Strategy: Chippenham Community Area</b></p> <p>Development in the Chippenham Community Area should be in accordance with the Settlement Strategy set out in Core Policy 1.</p> <p>Principal Settlements: Chippenham</p> <p>Large Villages: Christian Malford, Hullavington, Kington St Michael, Sutton Benger and Yatton Keynell.</p> <p>Small Villages: Biddestone, Burton, <u>Grittleton</u>, Kington Langley, Langley Burrell, Lower Stanton St Qunitin, Nettleton, Stanton St Quintin and Upper Seagry.</p> <p>The following Principal Employment Areas will be supported in accordance with Core Policy 35: Bumpers Farm Industrial Estate, Methuen Park and Parsonage Way Industrial estate.</p>
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			<p>Over the plan period (2006 to 2026), 26.5 ha of new employment land (in addition to that already provided or committed at April 2011)<sup>6</sup> and at least 4,500 approximately 5,090 new homes will be provided. At least 4,000 4,510 dwellings should occur at Chippenham., including the following land identified for strategic growth-</p> <p>North Chippenham 2.5 ha employment 750 dwellings          Rawlings Green Chippenham, 6 ha employment 700 dwellings          South West Chippenham 18 ha employment 800 dwellings          Land South West of Abbeyfield School (Landers Field), Chippenham 1 ha employment, 100-150 dwellings</p> <p>The strategic allocations will be brought forward through a master planning process agreed between involving the community, local planning authority, and the developer and others which meet any requirements as set out in the Development Templates shown by Appendix A-</p> <p><u>Allocations at Chippenham will be identified in the Chippenham Site Allocations Development Plan Document (DPD) and will accommodate approximately 26.5ha of land for employment and at least 2,625 new homes. The DPD will set out a range of facilities and infrastructure necessary to support growth. Areas for growth and site allocations within the DPD will be guided by the following criteria:</u></p> <ul style="list-style-type: none"> <li>i. <u>The scope for the area to ensure the delivery of premises and/or land for employment development reflecting the priority to support local economic growth and settlement resilience</u></li> <li>ii. <u>The capacity to provide a mix of house types, for both market and affordable housing alongside the timely delivery of the facilities and infrastructure necessary to serve them;</u></li> <li>iii. <u>Offers wider transport benefits for the existing community, has safe and convenient access to the local and primary road network and is capable of redressing transport impacts, including those affecting the attractiveness of the town centre</u></li> <li>iv. <u>Improves accessibility by alternatives to the private car to the town centre, railway station, schools and colleges and employment</u></li> </ul>
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			<p>v. <u>Has an acceptable landscape impact upon the countryside and the settings to Chippenham and surrounding settlements, improves biodiversity and access and enjoyment to the countryside</u></p> <p>vi. <u>Avoids all areas of flood risk (therefore within zone 1) and surface water management reduces the risk of flooding elsewhere</u></p> <p><u>Sites that do come forward should be the subject of a partnership between the private and public sector based on frontloading with a master plan to be approved by the Local Planning Authority as part of the planning application process. This master plan will guide the private sector led delivery of the site.</u></p> <p><del>North Chippenham Rawlings Green, Chippenham South West Chippenham Land South West of Abbeyfield School (Landers Field), Chippenham 2.5 ha employment 6 ha employment 18 ha employment 1 ha employment 750 dwellings 700 dwellings 800 dwellings 100-150 dwellings</del></p> <p><u>500</u> <u>Approximately 580 homes</u> will be provided in the rest of the community area over the plan period.</p> <p>Development proposals in the Chippenham Community Area will need to demonstrate how <u>the relevant</u> issues and considerations listed in paragraphs 5.48 and 5.54 will be addressed</p> <p><u>Table 5.4 Delivery of housing 2006-2026 – Chippenham Community Area</u></p> <table border="1" data-bbox="635 1630 1417 2060"> <thead> <tr> <th data-bbox="635 1630 762 1776">Area</th> <th data-bbox="762 1630 895 1776">Requirement 2006-26</th> <th colspan="2" data-bbox="895 1630 1153 1776">Housing already provided for</th> <th colspan="2" data-bbox="1153 1630 1417 1776">Housing to be identified</th> </tr> <tr> <td data-bbox="635 1776 762 1955"></td> <td data-bbox="762 1776 895 1955"></td> <th data-bbox="895 1776 1023 1955">Completions 2006-14</th> <th data-bbox="1023 1776 1153 1955">Specific permitted sites</th> <th data-bbox="1153 1776 1281 1955">Strategic sites</th> <th data-bbox="1281 1776 1417 1955">Remainder to be identified</th> </tr> </thead> <tbody> <tr> <td data-bbox="635 1955 762 2060">Chippenham</td> <td data-bbox="762 1955 895 2060"><u>4510</u></td> <td data-bbox="895 1955 1023 2060"><u>1020</u></td> <td data-bbox="1023 1955 1153 2060"><u>815</u></td> <td data-bbox="1153 1955 1281 2060">2400*</td> <td data-bbox="1281 1955 1417 2060"><u>275</u></td> </tr> </tbody> </table>	Area	Requirement 2006-26	Housing already provided for		Housing to be identified				Completions 2006-14	Specific permitted sites	Strategic sites	Remainder to be identified	Chippenham	<u>4510</u>	<u>1020</u>	<u>815</u>	2400*	<u>275</u>
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	240 - 252	Templates Appendix	<table border="1"> <tr> <td>Town</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Comm unity Area</td> <td><u>580</u></td> <td><u>180</u></td> <td><u>99</u></td> <td>0</td> </tr> <tr> <td>Comm unity area Total</td> <td><u>5090</u></td> <td><u>1199</u></td> <td><u>914</u></td> <td>2400*</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td><u>576</u></td> </tr> </table> <p>[Delete Chippenham templates]</p>	Town					Comm unity Area	<u>580</u>	<u>180</u>	<u>99</u>	0	Comm unity area Total	<u>5090</u>	<u>1199</u>	<u>914</u>	2400*					<u>576</u>
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MM 37	88	Core Policy 11 Paras 2 and 4, 5	<p>...</p> <p><u>Over the plan period (2006 to 2026), 6 ha of new employment land (in addition to that delivered or committed at April 2011) will be provided including:</u></p> <p>...</p> <p>...</p> <p>Over the plan period (2006 to 2026), <u>at least 1,200 approximately 1395 new</u> homes will be provided, of which <del>1,240</del> <u>about 1,220</u> should occur at Corsham. <u>Approximately 140 175</u> homes will be provided in the rest of the community area. <del>There will be no strategic housing sites allocated in Corsham. Non-strategic development</del> <u>Growth</u> in the Corsham Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>Development proposals in the Corsham Community Area will need to demonstrate how <u>the relevant</u> <del>these</del> issues and considerations listed in paragraph 5.59 will be addressed.</p> <p>...</p>																				
MM 38	66	Para 5.59 bullet 4 & 11	<ul style="list-style-type: none"> <li>• there are opportunities for some additional comparison retail in Corsham to help to more effectively meet the needs of local residents and help reduce trips by car to other destinations. However, <del>there is no</del> scope for any additional convenience retail provision in the town, <u>should focus on qualitative improvements and will only be appropriate if a suitably located site is available</u></li> </ul> <p>...</p> <ul style="list-style-type: none"> <li>• all development <u>will</u> <del>be planned and delivered in accordance with Wiltshire Council guidance to</del> maintain the integrity of the Bath</li> </ul>																				

			<p>and Bradford-on-Avon Bats Special Area of Conservation (SAC): <u>having particular regard to the Wiltshire Bats SAC Guidance.</u></p> <p>Additional text:  <u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Corsham Community Area this includes the Cotswolds Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p>			
MM 39	55	Core Policy 8	<p>...</p> <p>Over the plan period (2006 to 2026), <del>at least 1,380</del> <u>approximately 1,605</u> new homes will be provided, of which <del>1,240</del> <u>about 1,440</u> should occur at Calne and <del>140</del> <u>approximately 165</u> homes will be provided in the rest of the community area. <del>There will be no strategic housing sites allocated in Calne. Non-strategic development.</del> <u>Growth</u> in the Calne Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p><u>Over the plan period, 6 hectares of employment will be provided, including:</u></p> <table border="1" data-bbox="635 1173 1401 1391"> <tr> <td><u>Land East of Beversbrook Farm and Porte Marsh Industrial Estate</u></td> <td><u>Saved North Wiltshire District Plan Allocation</u></td> <td><u>3.2 hectares</u></td> </tr> </table> <p>Development proposals in the Calne Community Area will need to demonstrate how <del>those</del> <u>the relevant</u> issues and considerations listed in paragraph 5.42 will be addressed.</p> <p><del><b>Targets:</b> See housing and employment numbers above; Reduction in local unemployment figures.</del>  <del><b>Monitoring and Review:</b> AMR housing completions, NOMIS official labour market statistics.</del>  <del><b>Delivery Responsibility:</b> Wiltshire Council, developers.</del></p>	<u>Land East of Beversbrook Farm and Porte Marsh Industrial Estate</u>	<u>Saved North Wiltshire District Plan Allocation</u>	<u>3.2 hectares</u>
<u>Land East of Beversbrook Farm and Porte Marsh Industrial Estate</u>	<u>Saved North Wiltshire District Plan Allocation</u>	<u>3.2 hectares</u>				
MM 40	52	Para 5.41	<p>The strategy for Calne will help to maintain the economic base in the town with mixed growth of employment alongside housing, thus improving the self-containment of the settlement. <u>The strategy will respond to the Community Area's location (in</u></p>			



	53	Para 5.42	<p><u>full or part) within a national designated landscape. In Calne Community Area this includes the North Wessex Downs Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p> <p>Additional bullet point:</p> <p><u>an AQMA has been declared in the town and there are local concerns that development sites will exceed the mandatory limits set by European Directive 2008/50. Measures to improve air quality in Calne must be considered.</u></p>
MM 41	69	Para 5.64	<p>Add to paragraph:  <u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Devizes Community Area this includes the North Wessex Downs Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p>
MM 42	73	Core Policy 12	<p>Large Villages: Bromham, <del>Great Cheverell</del>, Potterne, Rowde, Urchfont, West Lavington/Littleton Pannell and Worton          Small Villages: All Cannings, Bishop Cannings, Easterton, Erlestoke, <del>Great Cheverell</del>  <del>Echillhampton</del> and Marston.</p> <p>The following Principal Employment Areas will be supported in accordance with Core Policy 35: Banda Trading Estate, Folly Road, Hopton Industrial Estate, Hopton Park, Le Marchant Barracks, Mill Road, Nursted Industrial Estate and Police Headquarters.</p> <p><u>Over the plan period (2006 to 2026) 9.9 ha of new employment land (in addition to that delivered or committed at April 2011) will be provided including:</u></p> <p>...</p> <p>...</p> <p>The strategic employment allocation will be brought forward through a master planning process agreed between the community, local planning authority and the developer and should be in accordance with the Development Templates shown by Appendix A.</p> <p>Over the plan period (2006 to 2026) approximately</p>

			<p><del>2500, at least 2,150</del> new homes will be provided of which <del>about 2010</del> 1,730 should occur at Devizes. <del>Approximately 49020</del> homes will be provided in the rest of the community area. <u>Growth</u> in the Devizes Community Area may consist of a range of sites in accordance with Core Policies 1 and 2. <del>If required, non strategic sites within the community area will be identified through either a neighbourhood plan or a site allocation Development Plan Document (DPD).</del></p> <p>Development proposals in the Devizes Community Area will need to demonstrate how <del>those</del> <u>the relevant</u> issues and considerations listed in paragraph 5.65 will be addressed.</p> <p><del><b>Targets:</b> See housing and employment numbers above, reduction in local unemployment figures.</del></p> <p><del><b>Monitoring and Review:</b> AMR housing completions, NOMIS official labour market statistics.</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council, developers.</del></p>
MM 43	75	Para 5.69	<p>Additional text</p> <p>..... <u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Malmesbury Community Area this includes the Cotswolds Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p>
MM 44	78	Core Policy 13	<p><u>Over the plan period (2006 to 2026) 5ha of new employment land (in addition to that delivered or committed at April 2011) will be provided including;</u></p> <p>....</p> <p>....</p> <p>Over the plan period (2006 to 2026), <u>approximately at least 1,200</u> 1,395 new homes will be provided of which <u>about 760</u> 885 should occur at Malmesbury. <u>Approximately 510</u> 440 homes will be provided in the rest of the community area. <del>There will be no strategic housing sites allocated in Malmesbury. Non-strategic development</del> <u>Growth</u> in the Malmesbury Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>Development proposals in the Malmesbury Community Area will need to demonstrate how <u>the</u></p>

			<p><u>relevant these</u> issues and considerations listed in paragraph 5.70 will be addressed.</p>
MM 45	83	Core Policy 14	<p>...</p> <p><u>Over the plan period (2006 to 2026) 3 ha of new employment land (in addition to that delivered or committed at April 2011)</u></p> <p>Over the plan period (2006 to 2026), <del>at least 850</del> <u>approximately 920</u> new homes will be provided of which <del>about 610</del> <u>680</u> should occur at Marlborough, including land identified to the west of Salisbury Road for strategic growth.</p> <p><u>Approximately 240</u> homes will be provided in the rest of the community area. <del>Non-strategic development</del> <u>Growth</u> in the Marlborough Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>Development proposals in the Marlborough Community Area will need to demonstrate how <u>the relevant these</u> issues and considerations listed in paragraph 5.75 will be addressed</p> <p><del><b>Deleted Targets:</b> See housing and employment numbers above, reduction in local unemployment figures. ¶</del></p> <p><del><b>Monitoring and Review:</b> AMR housing completions, NOMIS official labour market statistics. ¶</del></p> <p><del><b>Delivery Responsibility:</b> Wiltshire Council, developers. Wiltshire Council, developers and town and parish councils through community-led planning processes such as neighbourhood planning.</del></p>
	80	Para 5.74	<p>Additional text</p> <p>...</p> <p><u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Marlborough Community Area this includes the North Wessex Downs Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p>
	81	Para 5.75	<p>...</p> <p><del>the outstanding universal value of the World</del></p>

		Bullet 8	Heritage Site will be protected from inappropriate development both within the Site and in its setting <u>so as to sustain its OUV</u> in accordance with Core Policy 59 ...			
MM 46	88	Core Policy 15	<b>Spatial Strategy: Melksham Community Area</b>  Development in the Melksham Community Area should be in accordance with the Settlement Strategy set out in Core Policy 1. Market Towns: Melksham <u>and Bowerhill village</u> Large Villages: Atworth, Seend, Semington, Shaw / Whitley and Steeple Ashton. Small Villages: Beanacre, Berryfield, Broughton Gifford, Bulkington, <u>Great Hinton</u> , Keevil, Poulshot and Seend Cleeve.			
MM 47	88	Core Policy 15	... <u>Over the plan period (2006 to 2026), 6 ha of new employment land (in addition to that delivered or committed at April 2011) will be provided, including:</u>  <table border="0"> <tr> <td>Hampton Business Park</td> <td>Saved West Wiltshire District Plan Allocation</td> <td>Up to 6 hectares</td> </tr> </table> <del>Over the plan period at least 2,040 approximately 2,370 new homes will be provided of which 1,930 about 2240 should occur at Melksham. 110- Approximately 130 homes will be provided in the rest of the community area. There will be no strategic housing sites allocated within- Growth in the Melksham Community Area. Non-strategic development in the Melksham Community Area</del> over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.  Development proposals in the Melksham Community Area will need to demonstrate how <del>those</del> <u>the relevant</u> issues and considerations listed in paragraph 5.80 will be addressed.	Hampton Business Park	Saved West Wiltshire District Plan Allocation	Up to 6 hectares
Hampton Business Park	Saved West Wiltshire District Plan Allocation	Up to 6 hectares				
MM 48	94	Core Policy 17	... <u>Over the plan period (2006 to 2026) 3 ha of new employment land (in addition to that delivered or committed at April 2011) will be provided including:</u> ... ... <u>There are no Principal Employment Areas in the</u>			



		nt Templates	
MM 51	106	Para 5.109	Amend 7 <sup>th</sup> bullet point  development in the vicinity of the River Avon (Hampshire) must <del>protect the habitats, species and processes which maintain</del> <u>incorporate appropriate measures to ensure that it will not adversely affect the integrity of the Special Area of Conservation those Natura 2000 sites.</u>
MM 52	98	Core Policy 18	... Over the plan period <u>2006 to 2026</u> 2 ha of <u>new employment land (in addition to that delivered or committed at April 2011)</u> will be provided <u>including:</u>  <u>Land at Marlborough Road, Pewsey Saved Kennet Local Plan Allocation 1.66 ha</u>  <del>At least</del> <u>Approximately</u> 600 new homes will be provided in the community area. <del>There will be no strategic housing or employment sites allocated in the Pewsey Community Area. Non-strategic development</del> <u>Growth</u> in the Pewsey Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.  Development proposals in the Pewsey Community Area will need to demonstrate how <u>the relevant</u> <del>these</del> issues and considerations listed in paragraph 5.92 will be addressed.
MM 53	95	Para 5.91	Additional text: ... <u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Pewsey Community Area this includes the North Wessex Downs Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u>
MM 54	95	Para 5.92 Bullet points 4 and 5	development in the vicinity of the River Avon (Hampshire) or Salisbury Plain <u>Special Areas of Conservation</u> must <del>protect the habitats, species and processes which maintain the integrity of these Special Areas of Conservation</del> <u>incorporate appropriate measures to ensure that it will not adversely affect the integrity of those Natura 2000 sites</u>  <del>development which increases with the potential to</del>

			<p>increase recreational pressure upon the Salisbury Plain Special Protection Area will not be permitted unless proportionate contributions are made to offset impacts through the Wessex Stone Curlew Project towards the maintenance of the Stone Curlew Management Strategy which is designed to avoid adverse effects upon the integrity of the stone curlew population as a designated feature of the SPA</p>
MM 55	103	Core Policy 19	<p>...</p> <p><u>Over the plan period (2006 to 2026) 5ha of new employment land (in addition to that delivered or committed at April 2011) will be provided including;</u></p> <p>Land to the West of Templars Way Saved North Wiltshire District Plan Allocation 3.7 ha  <u>Brickworks, Purton Saved North Wiltshire District Plan Allocation 1.0 ha remaining</u></p> <p>Over the plan period (2006 to 2026), <del>at least 1,250</del> <u>approximately 1,455</u> new homes will be provided of which <del>about 920</del> <u>1070</u> should occur at Royal Wootton Bassett. <del>Approximately 330</del> <u>385</u> homes will be provided in the rest of the community area. <del>There will be no strategic housing sites allocated in Royal Wootton Bassett or Cricklade. Non-strategic development</del> <u>Growth</u> in the Royal Wootton Bassett and Cricklade Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>Development proposals in the Royal Wootton Bassett and Cricklade Community Area will need to demonstrate how <u>the relevant</u> <del>these</del> issues and considerations listed in paragraph 5.99 will be addressed.</p>
MM 56	99	Para 5.98  Para 5.99 bullet point 4	<p>Additional text:</p> <p>...</p> <p><u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Royal Wootton Bassett and Cricklade Community Area this includes the North Wessex Downs Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p> <p><u>Royal Wootton Bassett currently loses mMain food shopping trips to neighbouring towns. from Royal Wootton Bassett are currently lost to neighbouring towns, including Calne and so the development of</u></p>

			<p><u>Although there is no quantitative need for additional convenience retail in the town additional floorspace may be appropriate if a suitable site is identified. This would to address qualitative need and improve the retention of convenience trade in the town if a suitable site is identified and its overall vitality</u></p> <p><u>There is limited capacity for up to 400 sqm of comparison retail in the town.</u></p>
MM 57	119	Core Policy 24	<p>.... Winterbourne, <u>Laverstock and Ford</u>, Lopcombe Corner...</p> <p>...</p> <p>Over the plan period (2006 to 2026) <del>at least 555</del> <u>Approximately 615</u> new homes will be provided of which 190 should occur at Downton. <del>About 365</del> <u>425</u> homes will be provided in the rest of the community area. <del>There will be no strategic housing sites allocated within the Southern Wiltshire Community Area. Non-strategic development</del> <u>Growth</u> in the Southern Wiltshire Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>Development proposals in the Southern Wiltshire Community Area will need to demonstrate how <u>the relevant</u> <del>these</del> issues and considerations listed in paragraph 5.126 will be addressed.</p>
MM 58	116	Para 5.125	<p>Additional text:</p> <p><u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Southern Wiltshire Community Area this includes the Cranborne Chase &amp; West Wiltshire Downs Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p>
	117	Para 5.126	<ul style="list-style-type: none"> <li>the New Forest National Park is an important resource and so protecting the natural environment is a priority. The Core Strategy sets a policy framework to <del>prevent detrimental impacts on the park from neighbouring development-control development in neighbouring areas to the park from having a detrimental impact, and where such d.</del> <u>Development that would increase recreational pressures must not adversely affect upon the Natura 2000 designations of the New Forest, and</u></li> </ul>



			<p><del>must contribute to mitigation will be required through</del> the implementation of the Recreation Management Strategy. Development within the park area will be subject to a separate core strategy as described above</p> <ul style="list-style-type: none"> <li>• ongoing protection and enhancement of the Stone Curlew and calcareous grassland habitat at Porton Down must be secured through the implementation of an Integrated Business and <del>Ecological</del><u>Environmental</u> Management <del>Strategy</del><u>system</u>, to effectively <del>mitigate</del> <u>avoid</u> <del>potentially adverse impacts of from</del> further development at the site <u>maintaining the integrity of the Natura 2000 designations</u></li> <li>• development in the vicinity of the River Avon (Hampshire) must <del>protect the habitats, species and processes which maintain</del> <u>incorporate appropriate measures to ensure that it will not adversely affect</u> the integrity of this Special Area of Conservation</li> <li>• Development within the <u>community area will need to conserve the designated landscape of the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty and its setting, and where possible enhance its locally distinctive characteristics</u> <del>will need to give particular attention to the preservation of the character and scenic quality of the environment. Where proposals come forward emphasis will be placed on their scale, location, siting, design, materials and landscaping. Where possible, proposals should aid the delivery of the AONB Management Plan. Development within and adjoining the AONB should have regard to the AONB Landscape Character and Historic Landscape Character Assessments.</del></li> </ul>
MM 59	124	Core Policy 26	<p><u>Over the plan period (2006 to 2026) 12ha of new employment land (in addition to that delivered or committed at April 2011) will be provided including:</u></p> <p>...</p> <p>...</p> <p>Over the plan period (2006 to 2026), <del>at least 1,900</del> <u>approximately 1, 920</u> new homes will be provided of which <u>about 1,750</u> should occur at Tidworth and Ludgershall, including land identified at Drummond Park (MSA Depot) Ludgershall for strategic growth. Drummond Park (MSA) Depot 475 dwellings</p> <p>The strategic allocation will be brought forward through a master planning process agreed between the community, local planning authority and the developer and should be in accordance with the</p>

	121	Para 5.136	<p>development template shown by Appendix A. <del>and approximately</del> <u>Approximately</u> 170 homes will be provided in the rest of the Community Area <del>Non strategic development</del> Growth in the Tidworth Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>Development proposals in the Tidworth Community Area will need to demonstrate how <u>the relevant</u> <del>these</del> issues and considerations listed in paragraph 5.137 will be addressed.</p> <p>Additional text</p> <p>...</p> <p><u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Tidworth Community Area this includes the North Wessex Downs Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p>
MM 60	129	Core Policy 27	<p>...</p> <p>Over the plan period (2006 to 2026) 1.4 ha of <u>new employment land (in addition to that delivered or committed at April 2011)</u> will be provided, including:</p> <p>Hindon Lane, Tisbury      Saved Salisbury District Plan allocation      1.4 ha employment</p> <p>Over the plan period (2006 to 2026), <u>at least approximately</u> 420 new homes will be provided, of which <u>about</u> 200 should occur at Tisbury and <u>approximately</u> <del>220</del> 200 homes will be provided in the rest of the community area. <del>There will be no strategic housing sites allocated in the Tisbury Community Area. Non-strategic development Growth</del> in the Tisbury Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>Development proposals in the Tisbury Community Area will need to demonstrate how <del>these</del> <u>the relevant</u> issues and considerations listed in paragraph 5.143 will be addressed.</p>
	126	Para 5.142	<p><u>Additional text:</u></p> <p>...</p> <p><u>The strategy will respond to the Community Area's</u></p>



		<p>Para 5.150</p> <p><u>Figure 5.20</u></p>	<p>potential of vacant sites, to improve pedestrian linkages and to enhance the quality of the public realm. <u>The town centre is currently defined in the West Wiltshire District Local Plan – First Alteration and constitutes the “commercial area” (saved policy SP1). All town centre boundaries will be revisited, plus shopping frontages (and associated policies) through the Core Strategy Partial Review process.</u></p> <p><u>The Trowbridge Master Plan Masterplan for Trowbridge identifies 18 character areas (areas of opportunity) which are shown on the following map and are described in more detail below. Where it is clearly demonstrated, through an open book approach, and agreed by the local planning authority that the uses proposed in the Masterplan are not viable, alternative uses may be supported where they are consistent with the objective of securing a sustainable mix of uses for the Regeneration Area as a whole and would not be to the detriment of the delivery of other sites.</u></p> <p><u>To be updated as necessary</u></p>
<p>MM 62</p>	<p>130</p> <p>138</p>	<p>Para 5.146</p> <p>Core Policy 29</p>	<p>It is important that Trowbridge grows to strengthen its principal service centre role and deliver improved infrastructure and facilities in the town. Sustainable growth with employment development alongside new housing is needed both within the central area of the town and in the form of an urban extension, which is fully integrated with the town centre. <u>Further land will be identified in the Housing Site Allocations DPD. It will look to accommodate housing needs toward the end of the plan period and beyond 2026 since further significant house building on greenfield sites, will only be able to commence if adequate education infrastructure exists, such as delivered on the Ashton Park urban extension.</u></p> <p>...</p> <p><u>Core Policy 29</u> Development in the Trowbridge Community Area should be in accordance with the Settlement Strategy set out in Core Policy 1.</p> <p>Principal Settlements: Trowbridge</p> <p>Large Villages: Hilperton, North Bradley and Southwick.</p>

			<p>Small Villages: West Ashton and Yarnbrook.</p> <p>The following Principal Employment Areas will be supported in accordance with Core Policy 35: Canal Road Industrial Estate, White Horse Business Park, West Ashton Road, Bryer Ash Business Park and Bradford Road.</p> <p>Over the plan period (2006 to 2026), 25 ha employment land <u>(in addition to that delivered or committed at April 2011) and at least approximately 7,000</u> <del>6000</del> new homes will be provided within the Community Area, <u>of which 5,860 dwellings should occur at Trowbridge. At Trowbridge approximately 5,860 dwellings will be delivered and will involve an area for strategic growth including land identified to the south east of Trowbridge the town (Ashton Park), which extends towards the A350 to the south and the railway line to the west for strategic growth. An additional 950 dwellings will then be developed at the town only once improved secondary school provision is in place toward the end of the plan period and there has been a further assessment of effects on protected bat species and their habitats to ensure they are properly safeguarded.</u> <del>of which 5,860 dwellings should occur at Trowbridge, including land identified to the south east of Trowbridge, which extends towards the A350 to the south and the railway line to the west, for strategic growth</del></p> <p>West Ashton Road          Saved West Wiltshire          District Plan Allocation          10 ha</p> <table data-bbox="651 1709 1382 1861"> <tr> <td>Ashton Park Urban Extension</td> <td>15 ha</td> <td>2,600 dwellings</td> </tr> <tr> <td></td> <td>employment, 2600 dwellings</td> <td></td> </tr> </table> <p>The strategic allocation will be brought forward through a master planning process agreed between the community, local planning authority and the</p>	Ashton Park Urban Extension	15 ha	2,600 dwellings		employment, 2600 dwellings	
Ashton Park Urban Extension	15 ha	2,600 dwellings							
	employment, 2600 dwellings								

			<p>developer and should deliver any requirements as set out in the development templates as shown by Appendix A. <u>Further land for housing development at Trowbridge will be identified in the Housing Site Allocations DPD. Greenfield housing sites in addition to the strategic sites will only be permitted once improved secondary school provision has been delivered as a result of the Ashton Park urban extension. Any proposals which are likely to have an unavoidable adverse effect on a Natura 2000 site will not be taken forward.</u></p> <p><del>At least Approximately 150</del> <u>165</u> homes will be provided in the rest of the community area over the plan period. <del>Non-strategic development Growth</del> in the Trowbridge Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>Development proposals in the Trowbridge Community Area will need to demonstrate how <u>the relevant</u> <del>these</del> issues and considerations listed in paragraph 5.147 will be addressed.</p> <p>...</p>
MM 63	262	Appendix A Ashton Park, Key objectives	To deliver a high quality, sustainable and mixed use urban extension providing <del>40%</del> <u>30%</u> affordable housing and a suitable mix of housing in line with Core Policies 45 and 46.
MM 64	132	Paragraph 5.147	<p>Additional last 3 bullet points</p> <p><u>A more detailed Strategic Flood Risk Assessment (Level 2) is needed to provide a robust understanding of flood risk and inform decisions about the town's growth and appropriate selection of sites for development. Such work would consider all aspects of flood risk and, where practicable, the scope of the assessment should be agreed with the Council and Environment Agency.</u></p> <p><u>Development proposals should consider and seek to deliver appropriate measures to ensure that potentially harmful recreational pressures upon woodland sites to the south east of Trowbridge are avoided in the first instance and / or mitigated against.</u></p> <p><u>Woodland sites to the south east of Trowbridge support a breeding population of Bechstein bats, associated with Bath and Bradford on Avon Bats</u></p>

			<u>SAC. All development will be required not to adversely affect this designation and to ensure that connectivity with the SAC is maintained, having particular regard to the Wiltshire Bats SAC Guidance</u>
MM 65	142	Paragraph 5.154	<p>Additional text:</p> <p>...</p> <p><u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Warminster Community Area this includes the Cranborne Chase and West Wiltshire Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p>
		5.155	<p>Amended and additional bullet points:</p> <p>Development in the vicinity of the River <u>Avon</u> (Hampshire) or Salisbury Plain must <u>incorporate appropriate measures to ensure that it will not adversely affect protect the habitats, species and processes which maintain the integrity of these Special Areas of Conservation Natura 2000 sites</u></p> <p><u>A more detailed Strategic Flood Risk Assessment (Level 2) is needed to provide a robust understanding of flood risk and inform decisions about the town's growth and appropriate selection of sites for development . The strategic allocation can be delivered in advance of the result of this assessment. Such work should consider all aspects of flood risk and, where practicable, the scope of the assessment should be agreed with the Council and Environment Agency.</u></p> <p><u>All development will be required to maintain the integrity of the Bath and Bradford Bats Special Area of Conservation (SAC), having particular regard to the Wiltshire Bats SAC Guidance</u></p> <p><u>A more detailed Strategic Flood Risk Assessment (Level 2) is needed to provide a robust understanding of flood risk and inform decisions about the town's growth and appropriate selection of sites for development. The strategic allocation can be delivered in advance of the result of this assessment. Such work should consider all aspects of flood risk and, where practicable, the scope of the assessment should be agreed with the Council and Environment Agency</u></p>

<p>MM 66</p>	<p>146</p>	<p>Core Policy 31</p>	<p>...</p> <p>Over the plan period (2006 to 2026), 6 ha of new employment land (in addition to that already delivered or committed <u>at April 2011</u>) and <u>at least 1,770</u> <del>approximately 2,060</del> new homes will be provided. Of these <u>about 1,920</u> <del>1,650</del> dwellings should occur at Warminster, including land identified to the west of Warminster, between the existing built form and the A350 for strategic growth.</p> <p>...</p> <p>...</p> <p><u>Approximately 140</u> <del>120</del> homes will be provided in the rest of the community area. <del>Non-strategic development</del> <u>Growth</u> in the Warminster Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>Development proposals in the Warminster Community Area will need to demonstrate how the relevant <del>those</del> issues and considerations listed in paragraph 5.155 will be addressed.</p>
<p>MM 67</p>	<p>266 267</p>	<p>Appendix A</p>	<p>Update Development Template</p> <p>Key Objectives: To deliver a high quality mixed use urban extension providing <u>30%</u> <del>40%</del> affordable housing and a suitable mix of housing in line with Core Policies 45 and 46. Development that is integrated with the existing town ...</p> <p>Physical Requirements (2<sup>nd</sup> bullet) <u>Flood risk assessment required to ensure that development is not encroaching within Flood Zones 2 or 3 and to inform the sequential test.</u> A Surface Water Management Planning process</p> <p>Ecology (final bullet) <u>Financial contributions towards the Stone Curlew Management Strategy designed to avoid adverse effects upon the integrity of the stone curlew population as a designated feature of the Salisbury Plain Special Protection Area</u> <del>Financial contributions towards the Stone Curlew conservation project required to offset recreational impacts upon the Salisbury Plain Special Protection Area</del></p> <p>Archaeology and Historical Interest (new bullet)</p>



			<u>The master plan and detailed scheme design must have regard to the setting to Cley Hill Scheduled Ancient Monument</u>
MM 68	152	Core Policy 32	<p>...</p> <p><u>Over the plan period (2006 to 2026) 18.5ha of new employment land (in addition to that delivered or committed at April 2011) will be provided including:</u></p> <p>...</p> <p>...</p> <p>Over the plan period (2006 to 2026), <del>at least 1,390</del> <u>approximately 1,615</u> new homes will be provided, of which <u>about 1,500</u> <del>1,290</del> should occur at Westbury, including land identified at Station Road for strategic growth. ...</p> <p>...</p> <p><u>Approximately 115</u> <del>400</del> homes will be provided in the rest of the community area. <del>Non-strategic development</del> <u>Growth</u> in the Westbury Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>Development proposals in the Westbury Community Area will need to demonstrate how <u>the relevant</u> <del>these</del> issues and considerations listed in paragraph 5.163 will be addressed.</p>
MM 69	272	Appendix A	<p>Update Development Template</p> <p>To deliver a high quality mixed use urban extension providing <del>40%-30%</del> affordable housing and suitable mix of housing in line with Core Policies 45 and 46.</p>
MM 70	148	Paragraph 5.163 New bullet point	<ul style="list-style-type: none"> <li>• <u>the strategic allocation at Station Road will be progressed in line with the principles of the development template set out in Appendix A. If necessary and in order that the objectives of the Core Strategy are secured, this will be subject to early review and amendment through a formal planning process such as the Sites Allocation DPD</u></li> </ul>
MM 71	149	Paragraph 5.163 Amend bullet points	<ul style="list-style-type: none"> <li>• <del>development in the vicinity of Salisbury Plain must protect the habitats, species and processes which maintain the integrity of the Special Area of Conservation, while</del> <u>development with potential to increase</u> <del>which</del> recreational pressure upon the <u>Salisbury Plain</u> Special Protection Area will <del>not</del> be required to provide <del>permitted unless</del> proportionate contributions <u>towards the</u></li> </ul>

			<p><u>maintenance of the Stone Curlew Management Strategy designed to avoid adverse effects upon the integrity of the Stone Curlew population as a designed feature of the SPA are made to offset impacts through the Wessex Stone Curlew Project</u></p> <ul style="list-style-type: none"> <li>• <u>all development will be required to maintain the integrity of the Bath and Bradford Bats Special Area of Conservation (SAC), having particular regard to the Wiltshire Bats SAC Guidance.</u></li> </ul>
MM 72	330	Appendix D	<p>Amend reference in section:</p> <p>West Wiltshire District Plan 1<sup>st</sup> Alteration – Adopted June 2004</p> <p>...</p> <p>T1a Westbury Bypass Package <del>Continue to save</del> <u>Replaced by CP66 (Strategic Road Network)</u></p>
MM 73	157	Core Policy 33	<p>...</p> <p><del>At least 220</del> <u>Approximately 255</u> new homes will be provided in the community area. <del>There will be no strategic housing or employment sites allocated in the Wilton Community Area. Non-strategic development</del> <u>Growth</u> in the Wilton Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2. ...</p> <p>Development proposals in the Wilton Community Area will need to demonstrate how <u>the relevant</u> <del>these</del> issues and considerations listed in paragraph 5.171 will be addressed.</p>
MM 74	155	Paragraph 5.171 Final bullet	<p>...</p> <p>development in the vicinity of the River Avon (Hampshire) or <del>Prerscombe Down</del> must <u>incorporate appropriate measures to ensure that it will not adversely affect</u> <del>protect</del> the habitats, species and processes which maintain the integrity of those <del>Special Areas of Conservation.</del> <u>Natura 2000 sites.</u></p>
		Paragraph 5.170	<p>Additional text:</p> <p><u>The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Wilton Community Area this includes the Cranborne Chase and West Wiltshire Downs AONB. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.</u></p>
MM 75	220	Core Policy	...

		64	<p>iv. <u>smarter choices measures – appropriate smarter choices measures (e.g. travel plans, personalised travel planning, car sharing, and information and marketing campaigns) will be developed to influence people’s travel behaviour towards more sustainable travel options.</u></p> <p>...</p>
MM 76	221	Core Policy 65	<p><b>Movement of Goods</b></p> <p>The council and its partners will seek to achieve a sustainable freight distribution system which makes the most efficient use of road, rail and water networks. In particular:</p> <p>i. developments which generate large volumes of freight traffic or involve the movement of bulk materials should make use of rail or water transport for freight movements wherever practical</p> <p>ii. <del>where carriage of freight by rail and water is not realistic, encouragement will be given for Heavy Goods Vehicle (HGVs) traffic to use those roads where a minimum of community and environmental impacts will occur, principally the advisory freight network. Where problems caused by HGVs making unnecessary and undesirable use of routes are identified (other than on advisory freight routes), freight management measures will be considered</del> <u>the provision of intermodal and other rail freight terminals in suitable areas will be supported and land required for realistically deliverable proposals will be protected from inappropriate development</u></p> <p>iii. overnight lorry parking should be provided in the vicinity of the advisory freight network, either where demand can be demonstrated or to alleviate nuisance caused in local communities <del>iv. the provision of intermodal and other rail freight terminals in suitable areas will be supported and land required for realistic proposals will be protected from inappropriate development, iv. where carriage of freight by rail and water is not realistic, encouragement will be given for Heavy Goods Vehicles (HGV's) traffic to use those roads where a minimum of community and environmental impacts will occur, principally the advisory freight network. Where problems caused by HGVs making unnecessary and undesirable use of routes are identified (other than on advisory freight routes), freight management processes will be employed</del></p> <p>Paragraph</p> <p>The way in which an efficient and flexible freight</p>

		6.163	<p>distribution system supports economic vibrancy and growth cannot be at the expense of local communities or the environment. The council recognises this and takes seriously the need to achieve a more sustainable distribution of freight that balances the needs of the economy, local communities and the environment. <u>As part of this approach, realistic proposals (i.e. proposals where the need for intervention has been established and which are feasible, affordable, financially sound, and publicly acceptable) for intermodal and other rail freight terminals will be supported and protected from inappropriate development. Further details on the Council's approach to freight management are contained in the Wiltshire Local Transport Plan 2011-2016 Freight Strategy.</u></p>
MM 77	223	Core Policy 66	<p><b>Strategic Transport Network</b></p> <p>Work will be undertaken in conjunction with the Highways Agency, Network Rail, transport operators, <u>neighbouring authorities</u> and other agencies, that will seek to develop and improve the strategic transport network to support the objectives and policies in the core strategy and local transport plan.</p> <p>The strategic transport network is shown on the key diagram and includes:</p> <ol style="list-style-type: none"> <li>1) the national primary route network (<u>including the strategic road network</u>)</li> <li>2) the strategic advisory freight route network</li> <li>3) the rail network</li> <li>4) <u>the strategic bus network</u></li> </ol> <p>In particular, the strategic transport network along the A350 corridor will be maintained, managed and selectively improved to <u>assist employment support development</u> growth at Chippenham, Melksham, Trowbridge, Westbury and Warminster.</p> <p>The following improvements to enhance the strategic network will be progressed.</p> <ol style="list-style-type: none"> <li>i. The A350 national primary route at Yarnbrook/West Ashton will be improved. The improvement works necessary will be identified through further study work <u>including detailed bat survey information on Annex II species. The design and layout of any such improvements will ensure that important commuting routes for Annex II species are protected.</u></li> <li>ii. The development and/or improvement of the following railway stations will be promoted and encouraged.</li> </ol>

		<p>a. Corsham railway station. b. Melksham railway station. c. Royal Wootton Bassett railway station. d. <u>Westbury rail station</u></p> <p><u>The land required for these and other realistic proposals on the strategic transport network which support the objectives and policies in the Core Strategy will be protected from inappropriate development. Other potential rail improvements will be considered in association with relevant partners. Any proposals which are likely to have an unavoidable adverse effect on a Natura 2000 site will not be taken forward.</u></p>
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