

AGENDA

Meeting: **Cabinet**
Place: **The Kennet Room - County Hall, Trowbridge BA14 8JN**
Date: **Tuesday 15 May 2018**
Time: **9.30 am**

Please direct any enquiries on this Agenda to Will Oulton, of Democratic Services, County Hall, Trowbridge, direct line 01225 713935 or email william.oulton@wiltshire.gov.uk

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Membership:

Cllr Baroness Scott of Bybrook OBE	Leader of Council
Cllr John Thomson	Deputy Leader, and Cabinet Member for Communications, Communities, Leisure and Libraries
Cllr Richard Clewer	Cabinet Member for Housing, Corporate Services, Arts, Heritage and Tourism
Cllr Laura Mayes	Cabinet Member for Children, Education and Skills
Cllr Toby Sturgis	Cabinet Member for Spatial Planning, Development Management and Property
Cllr Bridget Wayman	Cabinet Member for Highways, Transport and Waste
Cllr Philip Whitehead	Cabinet Member for Finance, Procurement, ICT and Operational Assets
Cllr Jerry Wickham	Cabinet Member for Adult Social Care, Public Health and Public Protection

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Part I

Items to be considered while the meeting is open to the public

Key Decisions Matters defined as 'Key' Decisions and included in the Council's Forward Work Plan are shown as 

1 **Apologies**

2 **Minutes of the previous meeting** (*Pages 5 - 12*)

To confirm and sign the minutes of the Cabinet meeting held on 24 April 2018, previously circulated.

3 **Declarations of Interest**


To receive any declarations of disclosable interests or dispensations granted by the Standards Committee.

4 **Leader's announcements**

5 **Public participation and Questions from Councillors**

The Council welcomes contributions from members of the public. This meeting is open to the public, who may ask a question or make a statement. Questions may also be asked by members of the Council. Written notice of questions or statements should be given to William Oulton of Democratic Services by 12.00 noon on Wednesday 9 May 2018. Anyone wishing to ask a question or make a statement should contact the officer named above.

6 **Special School Provision in Wiltshire** (*Pages 13 - 38*)

 Report by Terrence Herbert, Corporate Director

7 **Wiltshire Housing Site Allocations Development Plan Document - Proposed Submission Materials** (*Pages 39 - 434*)

 Report by Alistair Cunningham, Corporate Director

8 **Exemption Request – Extra Care Housing and Housing Related Support** (*Pages 435 - 442*)

 Report by Dr Carlton Brand, Corporate Director

9 **Urgent Items**

Any other items of business, which the Leader agrees to consider as a matter of urgency.

Part II

Items during consideration of which it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed

Our vision is to create stronger and more resilient communities. Our priorities are: To protect those who are most vulnerable; to boost the local economy - creating and safeguarding jobs; and to support and empower communities to do more themselves.

CABINET

MINUTES OF THE CABINET MEETING HELD ON 24 APRIL 2018 AT THE KENNET ROOM - COUNTY HALL, TROWBRIDGE BA14 8JN.

Present:

Cllr Baroness Scott of Bybrook OBE (Chairman), Cllr John Thomson (Vice-Chairman), Cllr Richard Clewer, Cllr Laura Mayes, Cllr Toby Sturgis, Cllr Bridget Wayman, Cllr Philip Whitehead and Cllr Jerry Wickham

Also Present:

Cllr Ian Blair-Pilling, Cllr Clare Cape, Cllr Pauline Church, Cllr Matthew Dean, Cllr Richard Gamble, Cllr Gavin Grant, Cllr Deborah Halik, Cllr Darren Henry, Cllr Atiqul Hoque, Cllr Jon Hubbard, Cllr Tony Jackson, Cllr David Jenkins, Cllr Jerry Kunkler, Cllr Brian Mathew, Cllr Stewart Palmen, Cllr Fleur de Rhé-Philipe, Cllr Tom Rounds, Cllr Jonathon Seed and Cllr Ian Thorn

216 Apologies

Apologies were received from Councillor Graham Wright, Chairman of the Overview & Scrutiny Committee.

217 Minutes of the previous meeting

The minutes of the meeting held on 27 March 2018 were presented.

Resolved

To approve as a correct record and sign the minutes of the meeting held on 27 March 2018

218 Declarations of Interest

There were no declarations of interest.

219 Leader's announcements

There were no formal announcements.

220 Public participation and Questions from Councillors

The Leader outlined the approach taken to public participation encouraging representations to be made under the item for debate. There were no representations made on items not on the agenda.

221 **Sexual Health and Blood Borne Virus Strategy 2017-2020**

Councillor Jerry Wickham presented the report which briefed Cabinet of the results of the Sexual Health and Blood Borne Virus HNAs (Appendix 2 and 3) and presented the final Sexual Health and Blood Borne Virus Strategy (SHBBVS (Appendix 1)) for approval. In presenting the report, Councillor Wickham expressed his desire to see the strategy adopted by partners through the Health and Wellbeing Board and the option to report progress to the Board and through the Health Select Committee.

In response to an issue raised by Councillor Ian Thorn, Councillor Wickham confirmed that he was satisfied that the resources were in place to implement the strategy, and that the pilot approach taken with the new Area Coordinators would include the aims of the strategy amongst their priorities.

In response to an issue raised by Councillor Jon Hubbard, Councillor Wickham supported officer comments that there were officers available to speak to groups in the community about these issues but that he should contact him personally if support was not forthcoming.

In response to an issue raised by Councillor Clare Cape, Councillor Richard Clewer stated that dedicated outreach works were available to offer support to rough sleepers on this and other health issues.

Resolved

- 1. To acknowledge the Sexual Health and Blood Borne Virus Health Needs Assessments and approve the strategy document (see appendix 1, 2 and 3);**
- 2. To delegate authority to the Director of Public Health and Public Protection and Cabinet Member for Adult Social Care, Public Health and Public Protection, to finalise the strategy document for publication and to approve a corresponding implementation plan;**
- 3. To request the Health and Wellbeing Board consider the Strategy document and note the evidence used to develop it;**
- 4. To request that updates on implementation of the strategy be made to the Health & Wellbeing Board and the Health Select Committee as appropriate.**

Reason for Decision:

The finalised HNAs and the draft Sexual Health and Blood Borne Virus Strategy (SHBBVS) has gained approval from the Wiltshire Sexual Health Partnership Board and seeks Cabinet approval to action its contents and develop a corresponding implementation plan.

222 **Learning Disabilities In-house Respite Services**

➤ Councillor Jerry Wickham presented the report which: provided background information regarding the current Respite offer for people with learning disabilities including the current council owned and operated residential respite services and the reduction in the usage of these services; informed cabinet of the consultation process that was undertaken regarding the proposal to close 70 Derriads Lane Residential Respite Unit; and sought approval for the closure of 70 Derriads Lane Residential Respite Unit. In presenting his report, Councillor Wickham highlighted the following matters: the description of the facilities in question; the CQC report and their view on the inadequacy of some facilities; the reduction in the demand on the facilities; the results of the consultation undertaken; the impact on those using the facility and how their needs could be met at other facilities.

Councillor Christine Crisp, in her capacity as Chair of the Health Select Committee, confirmed that the committee had not had an opportunity to discuss the report due to the timing of meetings but that the Chair and Vice-Chair had been offered a briefing by officers on the matter. She expressed her personal view that the proposal appeared reasonable and stated that the committee would consider a update report in the future.

In response to concerns raised by Councillor Ian Thorn, Councillor Wickham restated his belief that it would not be appropriate to redevelop the site as a respite unit as alternative sites provided more appropriate facilities. Councillor Wickham also confirmed, in response to a question from Councillor Laura Mayes, his view that the three remaining centres would have sufficient capacity to meet future demand.

In response to concerns raised by Councillor Brian Mathew, Councillor Laura Mayes confirmed that a decision had been made three years ago to cease funding for overnight respite stays at Rowdeford School in response to the changing demand of families most of whom preferred to seek alternative types of respite with a view to maximising their children's time at home in their communities.

In response to a representation received from Councillor Gavin Grant, the Leader stated that she would ask officers to look at how the scheduling of meetings can best accommodate the needs of effective scrutiny.

In response to a representation received from Mr Colin Gale regarding his experience as a carer, Councillor Wickham reconfirmed his commitment to providing the best respite services in the appropriate locations; and the Leader encouraged all carers to stay in contact with the Council so that they could receive up to date advice about what support was available.

Resolved

- 1. To note the background information regarding the current Respite offer for people with learning disabilities including the current council**

owned and operated residential respite services and the reduction in the usage of these services;

- 2. To note the consultation process that was undertaken regarding the proposal to close 70 Derriads Lane Residential Respite Unit; and**
- 3. To approve the closure of 70 Derriads Lane Residential Respite Unit.**

Reason for Decision:

There has been a reduction in the demand for residential respite for people with learning disabilities with 20% fewer people accessing the services compared with 2015/16 resulting in an overall reduction of 13.8% usage.

A recent CQC inspection of 70 Derriads Lane has highlighted concerns with the overall condition of the building and issues around limited storage of equipment. Due to the building type (adapted bungalows) the building offers limited scope to further adapt it to meet the demands of people with complex needs in the future that increasingly require respite services.

223 **A303 Amesbury to Berwick Down Road Scheme**

➤ Councillor Bridget Wayman presented the report which sought: to inform Members of the actions taken by Highways England since the previous report and outline the scheme, which is the subject of this public consultation; to confirm the Council's response to the statutory public consultation; and seek agreement to the proposed delegated authority provisions to enable the Council to fulfil its statutory duties with regard to the Development Consent Order (DCO) process for this road improvement scheme. In making her presentation, Councillor Wayman drew attention to the proposals relating to Byways 11 and 12 and the option which officers were recommending Highways England pursue (paragraphs 89-101 within Appendix 1 of the report). She also stated that officers would be asked to consider including a statement proposing an assessment of the effect of the proposals on the Nile Clumps, and if necessary their potential replanting in an alternative position.

Councillor Mathew Dean spoke as Chair of the Environment Select Committee and confirmed that whilst there had not been an opportunity for the committee to discuss the report at their meeting, the views of the members of the committee had been sought. He also confirmed that whilst there was a diversity of the opinion, the majority of the members who had responded were in favour of the proposals.

Councillor Brian Mathew spoke against the proposals for the tunnel emphasising the desire to preserve the view of the site from the highway.

Councillor Fleur de Rhé-Philippe emphasised the community and heritage group support for the principle of the tunnel.

Resolved

- To note the contents of this report
- To agree the proposed response to Highways England for this statutory public consultation
- To restate the Council's support in principle for the proposal from HE to bring about substantial improvements to the A303 at Stonehenge by building a dual carriageway and tunnel, subject to the considerations listed in Appendix 1
- To Agree the proposed delegated authority provisions outlined below to enable the Council to fulfil its statutory duties with regard to the Development Consent Order (DCO) process for this road improvement scheme.

- 1) Endorses the response to Public Consultation document, as set out in Appendix 1 subject to amendment in (2), for the purpose of submission to Highways England
- 2) Authorises the Director for Highways and Transport in consultation with appropriate Cabinet Member(s) to:
 - a. Finalise the consultation documents and make any necessary minor changes in the interests of clarity and accuracy before they are submitted to Highways England as the Council's formal consultation response;
 - b. Make arrangements for any subsequent consultation responses that may be requested by Highways England; and
 - c. Respond to any queries that may arise as a result of the submission of this consultation response.
- 3) Delegated authority to be granted to Director for Highways and Transport to prepare the Local Impact Report on behalf of the Council and submit to the Planning Inspectorate in accordance with the timetable for the examination process
- 4) Delegated authority to be given to Director for Highways and Transport to make minor amendments to the Local Impact Report to rectify such matters as typographical or grammatical errors
- 5) Delegated authority to be given to the Director for Highways and Transport to formally contribute to, agree and sign a statement of common ground to be submitted to the Examining Authority of the Planning Inspectorate in accordance with the timetable for the Examination process and within the terms of the Council's Local Impact Report
- 6) Delegated authority to be given to Director for Highways and Transport to prepare on behalf of the Council and

submit to the Planning Inspectorate:

- a. **An adequacy of consultation representation (if required)**
 - b. **Representations on the Environmental Statement**
 - c. **The relevant representation and written representations on the application**
- 7) **Delegated authority to be given to Director for Highways and Transport to formally respond to the Examining Authority's Inspector's questions in accordance with the timetable for the examination process during the course of the Examination and also to make comment on the submissions of other parties including the applicant**
 - 8) **Delegated authority to be given to the Director for Highways and Transport to formally represent the views of the Council at the preliminary meeting, any topic specific hearing and subsequent requirements in accordance with the timetable for the examination process during the course of the examination, within the terms of the Council's Local Impact Report**
 - 9) **Delegated authority to be given to the Director for Highways and Transport to add formal comments on the draft requirements (conditions) and planning obligations of the Development Consent Order**
 - 10) **Delegated authority to be given to Director for Highways and Transport to carry out all non-statutory community benefit negotiations and to make decisions relevant to such negotiations in connection with or arising from the A303 Amesbury to Berwick Down Road Scheme**
 - 11) **Delegated authority to be given to Director for Highways and Transport to carry out all statutory functions of the Council under the Planning Act 2008 as both Local Authority and Planning Authority in connection with the A303 Amesbury to Berwick Down Road Scheme.**

Reason for Decision:

The case for dualling the A303 between Amesbury and Berwick Down has long been established through promoting economic growth in the South West, increasing safety, improving connectivity with neighbouring regions and protecting and enhancing the environment.

Highways England have improved the scheme previously consulted on and are now seeking views on a detailed scheme in advance of its Development Consent Order (DCO) application. Whilst, there are issues which will require resolution and further information is required before the Council can fully assess the scheme, officers believe that the proposed scheme is capable of addressing

the transport, economic, heritage and community issues associated with the A303.

The Council will continue to work with Highways England and other key stakeholders to further develop the scheme proposals in advance of the DCO application being submitted.

224 Melksham King George V Field

Councillor Toby Sturgis presented the report which sought approval to taking all steps necessary to ensure the transfer of the Legal Title to the King George V Field, Melksham to Melksham Town Council. A representation was received from Councillor Jon Hubbard on behalf of Melksham Town Council.

In response, Councillor Sturgis confirmed that the proposed decision should allow for further productive negotiations which he hoped would be able to lead to the successful transfer to the Town Council.

Councillor John Thomson also commented that he would discuss with officers the best way to support community groups in accessing power for events.

Resolved

- a) That Wiltshire Council, in its capacity as sole trustee of the King George's Field (the Trust), make any changes to the Trust documents that may be necessary to appoint Melksham Town Council as a trustee of the Trust and to resign as a trustee following that appointment;**
- b) That officers should, if appropriate, liaise with the Charity Commission and Fields in Trust to seek, if required, the approval of either of those bodies for the appointment of Melksham Town Council as trustee of the Trust;**
- c) Following the securing of any such approval and the appointment of Melksham Town Council as trustee of the Trust to transfer the Legal Title to the King George's Field to Melksham Town Council and then resign as trustee of the Trust; and**
- d) To authorise the Corporate Director for Growth Investment & Place to enter into any legal documentation which is required to enable the above to be implemented.**

Reasons for Decision:

To enable the Legal Title of the King George's Field, Melksham that is the subject of the Trust to pass to Melksham Town Council in the most cost effective and efficient way.

225 Freehold of assets to be sold

➤ Councillor Toby Sturgis presented the report which recommended that the Cabinet declare that freehold interest of the 3 assets can be sold by the Council.

The meeting's attention was drawn to two written statements, circulated in the supplement to the agenda, made by interested parties in relation to the Marlborough site. Representations in person were made by Councillor Mervyn Hall and Councillor Guy Loosmore on behalf of Marlborough Town Council; Councillor Jane Davies on behalf of local division member Councillor Stewart Dobson; and from Councillor Jon Hubbard on behalf of Melksham Town Council.

In the course of the presentation and discussion, the following issues were raised: the possible future uses for the site; the views of different groups as to the best use of the sites; the requirement for the Council to achieve Best Value, as defined by statute; that the Cabinet was only making a decision, at this stage, about whether the sites could be declared surplus for possible sale.

Resolved

- 1. That the freehold interest of the three assets identified in the report can be sold by the Council.**
- 2. That members note the continuing approach set out in paragraph 8 Authorise the Director for Housing and Commercial Development to dispose of freehold interest of the assets, or in absence Corporate Director for Growth, Investment and Place.**

Reasons for Decision:

To confirm the freehold interests of the assets can be sold in order to generate capital receipts in support of the Council's capital programme.

226 **Urgent Items**

There were no urgent items.

(Duration of meeting: 9.30 am – 11:03am)

These decisions were published, earlier, on the 30 April 2018 and will come into force on 9 May 2018

The Officer who has produced these minutes is Will Oulton of Democratic Services, direct line 01225 713935, e-mail william.oulton@wiltshire.gov.uk

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Wiltshire Council

Cabinet

15 May 2018

Subject: Special School Provision in Wiltshire

Cabinet Member: Councillor Laura Mayes - Children, Education and Skills

Key Decision: Yes

Executive Summary

The report takes forward issues addressed in the preceding cabinet report of November 2017. It makes a proposal for preliminary consultation on ways to establish long term arrangements for meeting the needs of pupils with cognitive needs in the north of the county, currently met at St Nicholas, Larkrise and Rowdeford special schools. The November report explained the context for this, in the 2015-18 Special Educational Needs strategy and the review of Wiltshire's special schools. It also set out the issues giving rise to the need for action:

- i) *Pupil growth*: an additional 220 special school places for 5-16 year-olds needed by 2026;
- ii) *North/south imbalance* of provision: pupils travelling from south to north;
- iii) *Physical condition* of some schools;
- iv) *Financial pressures* on some schools and on the high needs block (ie special education funding element of the authority's earmarked grant for school funding, the Dedicated Schools Grant (DSG));
- v) *Pupil outcomes* with interest in support for mainstream schools.

A programme of work was proposed in November, flowing from the Special Educational Needs Strategy 2015-2018. This report identifies progress with that in terms of consultation and communications, further research and provision. The last of those relates to previously agreed consultation on the addition of Severe Learning Difficulties to the designation of Rowdeford, development of new Autism/Social, Emotional and Mental Health needs (ASD/SEMH) provision in the south and exploration of primary provision.

Consideration of the current position and next steps now identifies:

- Solutions for a future-proof pattern of special education in the south, and for ASD/SEMH in the north.
- Two school sites which appear unviable and one of uncertain suitability for the long term, all being schools for cognitive difficulties in the north;
- Other sites with potential to enable new build or expansion;
- Revenue implications and a critical risk to the council arising from any failure to take action to identify capital funding to expand special school provision to match future pupil numbers;
- The unclear position of the previously available external source of necessary capital funding through the national free school policy;

- Potential to realise capital assets.

The report makes suggestions for future planning in response to proposals made by the schools themselves. With other areas of the special school estate addressed and/or secure, a priority to address the shortfall of places for complex needs/cognitive difficulties in the north is identified. The priority is to address (a) current overcrowding at St Nicholas and Larkrise, and (b) future growth for those schools as well as at Rowdeford. Options considered include one-school, two-school and three-school solutions to take on the work of St Nicholas, Larkrise and Rowdeford. Relative merits of those options are illustrated, leading to proposals to consult in order to establish views on them.

Proposals

- a) To thank special schools and stakeholders for their contributions to development work noted in the report.
- b) To recognise the achievements noted in the report for the future pattern of Wiltshire special schools in the context of its 2015-18 Special Educational Needs Strategy: namely, what is being developed in the south of the county and what is working well in the north.
- c) With a focus on the need to build capacity for cognitive needs in the north, to enter into a pre-statutory consultation phase on the options in the report:
 - i) to develop a single school for cognitive needs at Chippenham, or
 - ii) to develop two schools in Chippenham and Trowbridge, or
 - iii) to develop/continue three schools in Chippenham, Trowbridge and Rowdeford...with provision moving from the current St Nicholas, Larkrise and Rowdeford sites or not, according to the particular case, and only when new provision is operational;
- d) That the results of that consultation be brought back to cabinet to determine any further action, including the possibility of publishing statutory notices for formal consultation on any specific proposal arising from the pre-statutory consultation.

Reason for Proposals

It is appropriate to recognise successful developments and practice in the whole arena of Wiltshire's special education and special schools
Action is needed to make appropriate provision for pupils with special educational needs and to avoid a long-term budget problem.
To ensure due process and transparent consideration of next steps
To secure the right pattern of special schools for the long-term future.

Terence Herbert, Corporate Director

Subject: Special School Provision in Wiltshire

Cabinet Member: Councillor Laura Mayes - Children, Education and Skills

Key Decision: Yes

Purpose of Report

1. To update Cabinet on the work done, and now being undertaken to secure the future of special school provision in Wiltshire;
2. To confirm next steps in relation to setting out parameters for development, securing capital funding and progressing change;
3. To confirm authority for preliminary consultation on the future pattern of Wiltshire special schools in the context of its 2015-18 Special Educational Needs (SEN/SEND) Strategy.

Relevance to the Council's Business Plan

4. This work on Wiltshire's Special School provision is relevant to the following Business Plan 2017-2027 priorities:
 - i) *Priority: Growing the economy*
 - High quality special educational provision in all schools; ensuring that all pupils achieve the best possible outcomes and go on to enjoy the best start to adult life.
 - ii) *Priority: Strong communities*
 - Focus on delivering the education provision, in-county, that children and young people with special education needs and/ or disability (SEND) require – the right education provision, at the right time, in the right place.
 - iii) *Priority: Protecting those who are most vulnerable*
 - Ensuring that children and young people with SEND can have the best education and support, provided in good quality estate.
 - Ensuring that special education provision in Wiltshire is equitably provided, reducing the number of pupils who must travel excessive distances to school.

- Special education provision that is better aligned with other related services (community health services, social care, and mental health for eg) to improve access to, and provision of, required support.

iv) *Priority: Innovative and effective council*

- Doing things differently to ensure that the council can meet its statutory duties to provide the right education provision in the face of a rising population and growing demand.
- Improving the focus on outcomes for pupils with SEND.

Main Considerations for the Council

5. Its business plan priorities and statutory duties around protecting vulnerable pupils and ensuring high quality local placements for those with special educational needs;
6. Its 2015-18 Special Educational Needs Strategy with the vision inherent in that and expressed in the report;
7. The critical financial risk to the council arising from the pressure on local special school places and the resulting cost of independent special school placements;
8. The ambiguity around dedicated national funding for special school capital developments;
9. The need to develop provision in the right place, and particularly the balance between the north and south of the county;
10. The strong case for investment in schools fit for the future
11. Due process in terms of statutory and pre-statutory consultation.

Background

Vision for Special Educational Needs

12. Wiltshire Council has established a clear commitment to supporting the vulnerable and to the importance of special educational needs within its service delivery. The council's business plan sets aspirations for this project:
 - ensure that all pupils achieve the best possible outcomes.
 - provide the right education, at the right time, in the right place.
 - offer the best education and support within good quality estate.
 - equitably provided and better aligned with other related services
13. The Special Education Needs Strategy set out the priorities for SEN provision in Wiltshire's schools:

- Identify right physical provision
- Improve outcomes and practice
- Ensure inclusion
- Early identification, positive engagement and improved transitions
- Support schools and staff
- Manage financial pressures

14. This report describes the Council’s process to secure future-proof centres of excellent, pupil-focused, educational support within special schools. We affirm that special schools should be central to a coherent framework encompassing mainstream schools, resource bases, targeted funding and professional partnerships. Whilst affirming the importance of the whole structure, the focus of this report is necessarily on Wiltshire’s special schools. Underpinning the process is an acknowledgement of the dedication and commitment of their staff and governors, their critical partnerships with parents and professional stakeholders, and the entitlements of their pupils.
15. Wiltshire Council has the statutory responsibility to ensure Wiltshire’s special schools are truly fit for purpose -- not only “right” in timing, location and focus, but more than right: inspiring, state-of-the-art and offering excellence in both education and outcomes for all pupils.

Previous report

16. Scope

This report follows its predecessor of November 2017. The report covered the following:

17. Background

- i) Glossary (accessible in the background paper); Statutory responsibilities; Special School Provision in Wiltshire; Financing SEND provision; Capital funding for SEND provision; Special Educational Needs Strategy 2015-2018.

18. Update

- ii) Work with special Schools; concerns regarding special school provision; moving forward; future intentions – programme of work; current service; task group; financial implications; legal implications

19. Conclusions

- iii) Further work to be done and future report.

Key Points

20. The November update gave an account of context in the background information, and in the update set out issues giving rise to the need for action:

- i) *Special Educational Needs Strategy 2015-18* identifying vision and priorities for SEN provision, including “right places...managing financial pressures” and noting the need for “collaborative working to facilitate a more efficient use of scarce resources” (para 15);
- ii) *Pupil growth*: an additional 220 5-16 YO special school places needed by 2026 in addition to the current 588 places, with 123 in the north and 97 in the south;
- iii) *North/south imbalance* of provision meaning that 71 ASD & SEMH special school pupils were travelling from south to north;
- iv) *Physical condition* of some schools;
- v) *Financial pressures* on some individual schools and on the high needs block as a whole;
- vi) *Pupil outcomes* resulting in interest in sector-led support for mainstream schools.

21. The report noted the LA's position statement of June 2017, meetings of the WASSP (LA/stakeholder) group, resulting proposals from special schools to address the issues, and an LA commitment to further analysis of those to inform future proposals.

The aims of the programme of work were...

- i) To maximise current Severe Learning Difficulties (SLD) / Complex provision to meet as much of the current and short to medium-term demand locally, as is possible;
- ii) To establish a strategic property solution for SLD/Complex provision in the North; enabling an increase of Planned Admission Number (PAN) to 350 (~an additional 50 places for growth) to meet identified future longer-term demand;
- iii) To create new Autistic Spectrum Disorder/Social Emotional & Mental Health (ASD/SEMH) provision in the South, providing an additional 130 places over time, to meet identified future demand and reduce geographic inequity of provision; potentially rationalising ASD and SEMH provision in the North to achieve this;
- iv) To facilitate new and/or expanded primary phase ASD/SEMH provision in the North and South, providing an additional ~50 places over time, to address shortfalls in current provision and to better meet the needs of children.

22. With reference to immediate pressures, cabinet was notified of plans to undertake consultation on proposals to expand provision at Exeter House special school and to change the designation of Rowdeford House special school to include SLD as well as moderate learning difficulty (MLD) pupils.

23. The report referred to the dedicated Children's Select Committee task group which met four times up to the end of February, as well as to legal and financial implications. Financial implications included pressure on high needs block, and the relevance of capital implications.
24. Finally, annexes to the report included a glossary, an account of special schools in Wiltshire with concerns about the provision, the programme of work, breakdown of projected demand by need and geography, over time, and a North/South split descriptor.
25. Key issues were in annex III expanding on the key points from November above, and annex IV expanding on the programme of work.

What has been achieved December – March

26. Consultation and communications

- i) The portfolio holder for disabilities and the interim director of education and skills have both visited each of the special schools at least once;
- ii) WASSP meetings have been held in January and February; a further meeting has been planned for Tuesday 8 May upon release of this report;
- iii) WPCC (Wiltshire Parent & Carer Council) parents' meetings have been held in the north and south of the county, and the interim director of education and skills has met individually with their executive director.
- iv) Rowdeford Special School consultation (see below).

27. Further research

- i) Benchmarking on special school sizes in the region has been undertaken, showing Wiltshire's schools not to be outliers in terms of existing special school sizes, but noting that new schools tend to be larger and small schools based on different funding models;
- ii) Pupil number projections have been interrogated and confirmed;
- iii) Exploration of capital funding options has been undertaken (see below)
- iv) Examination of special schools' proposals has been undertaken in respect of schools' capacity and condition, and their proposal for an over-arching partnership aimed to co-ordinate activities (see below).

28. Improving Provision

- i) Statutory consultation on the addition of Severe Learning Difficulties (SLD) to the designation of Rowdeford special school has been

undertaken with positive results, providing additional flexibility in the system;

- ii) A process of seeking expressions of interest in delivering new ASD/SEMH provision has been undertaken; a commitment has been made; expanded provision in the south is intended to provide greater flexibility and choice with effect from 2018. In practice this means planning a new 130 place primary & secondary phase ASD/SEMH provision in Salisbury in partnership with a multi-academy trust, with an interim provision in a primary school which will be vacated and available in Summer 2018;
- iii) Exeter House special school capacity is being addressed. The local authority and school will work closely together to deliver an increase in places to 150 (including Post 16 places) by 2026, on the current school site. Meanwhile there is a short-term expansion plan, and funding agreement, in place to deliver an increase in places from 121 to 133 in 2018 to meet identified demand in the south.

Programme of Work

29. Relating those points back to the programme of work identified in November: (a) is in progress with Rowdeford and Exeter House changes as key developments; (b) is addressed in the proposals below; (c) is in hand with a proposal to make more places available in the south effective from September 2018 with subsequent expansion; (d) Primary phase review not completed; this can be undertaken under delegated authority.

Context of Funding Pressure: Revenue Pressure and Capital Need

30. Wiltshire Council has been successful in containing SEND spending in the past, consistent with national policies to minimise statement numbers and special school placements. Unintended consequences of the previous low central spend on SEND now include a national funding formula for the allocation of high needs block (HNB) funding which is based 50% on historical allocations, therefore effectively freezing the previous low funding allocations. Wiltshire is “on the funding floor” for the new formula and therefore will attract only the minimum 0.5% increase over the next two years.
31. In the past, Wiltshire’s proportion of statements to pupil population was below national (and considered good practice); recent growth means it is now equivalent to national, and projections relating to population growth, housing development and army re-basing have indicated the need for an additional 220 of 5-16YO special school places by 2026. However, the funding mechanism for high needs does not reflect increases in demand or changes in needs. As with other councils experiencing growth in SEND numbers,

many in a worse position than Wiltshire, the result is a pressure on the HNB element of the dedicated schools grant (DSG), which is running an in-year deficit.

32. Activity over the past two years has sought opportunities for co-production of solutions, undertaken in the knowledge that expansion of the special school estate would be needed, and the expectation that an anticipated Wave 13 round of free school bidding would enable the necessary capital funding. As of January 2018, the basis of that source of capital was unclear.
33. Another source of capital is needed in order to keep options open. Failure to confirm that would mean the additional 220 pupils would not be accommodated in Wiltshire, but would have to be placed in independent special schools. SEND assessment and allocation processes are by law needs-driven, and caselaw has strengthened the position of appellants in SEND Tribunals, with resulting costs to LAs.
34. If we model the increased revenue cost based on a unit cost for a residential independent special school placement (£68k) then the increased spend for the “do nothing” option over the period to 2026 is £15.1m. However, the cost avoided is estimated at £10.4m, as there is also an additional cost to any in-house solution in place and top up funding. If we were to use the current average cost for our mix of independent special schools ie, a mixture of day and residential (average £45k), then the increased spend over the 9-year period is £10m and the cost avoided approx. £5m (and continuing). More detailed financial implications are in the section at the end of the report.
35. Thus cost estimates reflect assumptions made in relation to what independent special school (ISS) provision could be procured the event that we have to look to the market. It is likely that the proportion of residential placements would increase from the current mix because of a lack of local ISS provision. Wiltshire officers would struggle to find the required number of places anywhere within daily commuting distance, with higher unit costs resulting from transport, greater reliance on residential provision, and market forces of supply and demand. This is a critical risk to the council, with costs estimated on balance at £5-10m over a 9-year period with the difference in costs between using the independent sector and developing in house provision continuing at approx. £1.5m per year beyond that period.
36. Special school places cost more capital to build more than mainstream. Requirements for storage of mobility and medical equipment, hoists and tracking, therapy rooms and pools, small classes and extra staff all add to floor area needs as well as specialist facilities. Estimates of the aggregate cost of capital works to add the necessary special places are in the region of £25-35m, but likely to be at the lower end of that range.
37. What that means is £30m non-recurrent capital spend, to save £5-10m revenue costs up to 2026 but with revenue costs continuing to increase beyond that period without new provision. Moreover, the expected introduction of a “hard” national funding formula for mainstream schools will mean schools will be paid directly by the national funding body, and the

schools block of the council's Dedicated Schools Grant (DSG) will be removed. This will nullify the council's policy of regarding an overspend on special needs funding (High Needs Block) as a pressure on the Wiltshire schools' budget (DSG) overall. Councils will only be in receipt of the high needs and early years block allocations, resulting in the risk that this revenue pressure would be exerted on Wiltshire Council budgets and not schools' budgets.

Finding solutions: Sourcing Capital and Expanding Capacity

38. *Finding local solutions to sourcing capital* has become a priority, given the need to expand local special school provision, the risk of not doing so and the apparent disappearance of a national free school route to capital;
39. Some solutions to the need to expand capacity are already in hand – see *Improving Provision* above;
40. The need for expansion is confirmed in *Expanding Capacity (1)* below;
41. The examination of special school proposals has identified the extent to which they represent solutions (*Expanding Capacity (2&3)*);
42. Finally, practical options are put forward.

Sourcing capital

43. It has been established that Wiltshire's special school system needs additional capacity. There aren't enough places, they're in the wrong locations, and overcrowding of some schools, whilst well managed by their leaders, has had the unintended consequence of disguising the shortfall. Sources of capital have been considered, including:
 44. Regional Schools Commissioner – not to rule out the free school route which had been available until recently;
 45. Academies locally include two Wiltshire special schools, which might have access to capital for growth;
 46. Release of school sites might yield capital receipts, subject to the educational case being made; capital released in this way would be insufficient to meet building costs.
47. The LA has non-school sites which could produce capital;

48. There is a capital programme not hitherto used for schools, but which might be seen as the ultimate source of a solution to the revenue risk highlighted above.

Expanding Capacity (1): Confirming the Need

49. Relevant material from the special schools is in section 7.1 page 9 of their report. Their data is based on the LA's 2017 calculations in its November report, which were reviewed in February 2018 and appear to be agreed, have been interrogated, and found to be accurate. The table is copied below, presenting data by primary need for both north and south over time, concluding that growth in the north is overall +123 and south +97, equating to 220 by 2026.

50. Due diligence work noted below indicates the need to focus on complex needs in the north, where, taking into account post-16 figures there is a need to plan for a capacity of 350 places, balancing Exeter House provision in the south.

November report, Annex V

51. Based on analysis of growth because of reforms, housing developments and military rebasing the following breakdown is projected:

By SEN Designation	Current Placements in Wiltshire Special Schools (5 – 16yrs)		2yrs (2019)			5yrs (2022)			9yrs (2026)		
	Current places North	Current places South	North	South	All new	North	South	All new	North	South	All new
ASD	111		4	9	13	24	22	46	50	40	90
SEMH	68		2	3	5	10	9	19	21	17	38
Complex	279	82	4	8	12	23	20	43	49	37	86
Sensory			0	1	1	2	1	3	3	3	6
All	458	82	11	20	31	58	52	111	123	97	220

52. These figures suggest accumulated primary needs as follows in 2026:

Need	Current	Growth	2026 need
ASD	111	90	201
SEMH	68	38	106
Complex*	361	86	447
Sensory	0	6	6

The report goes on to propose solutions school by school, noted below.

Expanding capacity (2): Proposals from the special schools

53. In response to the data and to the LA's proposals of summer 2017, special schools made proposals which the LA undertook to consider.
54. *Downland* (SEMH) proposal sees no problem with meeting 2-year growth, but a need for an increase in Planned Admission Number for 5-year growth. For 9-year growth utilisation and reconfiguration provide low-cost expansion routes, and the site has sufficient land. The school already has some ASD pupils and has been moving ahead to accommodate primary age and female pupils.
55. *Springfields* (ASD). Reach South Springfields Academy has responded positively to the council's assessment of growth needs, agreeing with its aims for meeting those.
56. *Larkrise* (*SLD/PMLD (Profound and Multiple Learning Difficulties)) proposals point to strong community links and academic improvements. They note their flexible use of the current accommodation, and rely on higher spend (£750k capital) and/or the use of the Ashton St Centre for expansion. Use of the latter is the school's preferred option and one vocally supported by the school's governors.
57. *St Nicholas* (SLD/PMLD) proposal notes their effective presence within the community, and how they are "flexing" in response to needs currently, such that they would need no capital or staffing investment to accommodate 2-year growth. The school's preferred option for 5/9-year growth carries a capital cost of £510k with additional classrooms on site. A second option would use one of the free school sites planned for Chippenham in a £6.7m new build school.
58. *Rowdeford* (MLD/SLCN (Speech, Language and Communications difficulties)/ASD). The school is relatively centrally placed in the county and its site area would appear to provide opportunities for growth. It is supported by a charitable trust enabling additional fundraising. 2-year growth could be met at a cost of £9.5k, and 2022/26 numbers could be met according to the school at a capital cost of £350-£700k with needs for additional classrooms.
59. *Exeter House* (SLD/PMLD/ASD). Expansion to meet identified demand is considered achievable through internal remodelling (at unidentified but relatively low cost) with some rebalancing of placements to northern schools.
60. The schools also put forward what is for them a key proposal to establish a co-ordinating body to establish a partnership between them. The LA supports school partnerships in principle, subject to clarity of respective roles and duties. In itself this proposal is intended to address co-ordination and

efficiency rather than pupil growth and expansion of capacity, so it isn't analysed here. It is however a serious professional piece of work which merits due consideration.

Expanding capacity (3): Wiltshire's due diligence work

61. This work was undertaken in response to schools' proposals for expansion, summarised above. It has shown no major estates problems for Springfield, Downland or Exeter House, and thus no barriers to their proposals resulting from capacity issues. The issue is to match expansion to demand, so that funding is appropriate. The focus is therefore on St Nicholas and Larkrise because of existing over-subscription, and on Rowdeford for its site, main building and potential part in a solution to addressing expansion for pupils with cognitive difficulties.
62. In order to comply with DfE recommended minimum areas, pupil numbers at St Nicholas and Larkrise would need to reduce by about 100 altogether, adding to the need to expand elsewhere. St Nicholas appears to have a maximum capacity of 53 - currently it has 96 pupils - and Larkrise is similarly oversubscribed with a capacity of only 44. This oversubscription has been well managed by school leaders, to the extent that their proposals indicate their ability to accommodate short term growth. However, we would not expect to confirm long-term plans for mainstream pupils under those constraints, and therefore arguably should not plan a long-term future-proof strategy to treat vulnerable pupils in a way inconsistent with a priority of the council's business plan ("*Ensuring that children and young people with SEND can have the best education and support, provided in good quality estate*").
63. St Nicholas' continuation on the current site would not on that basis be reasonably sustainable in the long term. Neither the building nor the grounds meet DfE expectations unless the school were to reduce significantly in pupil numbers. An additional 12 places (school's figures) for 2022 looks more realistic as a helpful short-term measure (subject to usual risk assessments). However, examination of proposals against DfE criteria suggests that the site constraints preclude implementation of the school's long-term proposals other than by reference to their option of a new build on a different site.
64. For Larkrise, long term continuation on the current site would similarly not be sustainable. However, the nearby Ashton St site (until recently the adult centre) has been a focus of attention and considered by school governors and a past LA working group as a solution to the continued operation of the school in a split site mode. This additional site could provide more than enough space for Larkrise now and in the future, but such use would need to be considered against the alternative of grant-funded demolition and use of the site for housing which is also needed in the town. In terms of DfE site regulations there appears to be no scope permanently to expand Larkrise without the additional Ashton St or other land.
65. Estates team analysis concludes that the Rowdeford proposals could meet the DfE's minimum recommended areas subject to planning permission and

listed building consent being granted. The existing buildings include a substantial grade II listed regency house. Preliminary analysis of planning and highways factors suggests significant constraints arising from the listed status of the building, its location in a flood area, and the nature of the road which is not conducive to the provision of improved access transport associated with higher pupil numbers.

66. Due diligence work has thus identified a key problem not recognised before because of the schools' resourceful management of oversubscription at St Nicholas and Larkrise and the unusual site at Rowdeford. Exeter House in Salisbury can deliver the 130 places needed there, but 350 are needed in the north of the county to make up the total in the table on page 9. A significant shortfall of places has to be met because of current overcrowding and future growth.
67. Council officers have undertaken an extensive investigation of options for expansion/new build in the north, reflecting the option proposed by St Nicholas school, and the confirmed need for major expansion. Options considered include:
- i) Larkrise – Noting the site constraints, and on the assumption that no land is available to facilitate the expansion of the school, "...the proposals do not meet the DfE's minimum recommended areas. It is therefore not considered viable to implement the proposals on this basis". However, examination of the nearby Ashton St site concluded that the two sites together could provide for 230 pupil places.
 - ii) St Nicholas – "We do not consider it appropriate to implement the proposed works as it is considered that site constraints preclude implementation of the proposals." However land would be available in Chippenham for a new build/relocation.
 - iii) Rowdeford – "the planning officer considers the modest expansion of the school may be possible subject to detailed consideration of siting and design...The listed status of Rowdeford House may restrict the ability to alter either the layout or fabric, and ongoing maintenance costs are anticipated to be higher than a modern equivalent... within (Rowdeford House) there are many issues which cannot be overcome due to design constraints and its listed building status...other buildings...only minor adjustments needed. The site is outside the settlement boundary...and there is effectively a presumption against development...(but) national policy attaches great weight to the need to create, expand or alter schools...the site is partially within flood zones...numerous protected species records exist within the existing school site..."
 - iv) Forest Farm Melksham was discounted, as being unsuitable for a new school.
 - v) Land adjacent to Rowde Primary School, Rowde, was considered to be potentially one of the better options in terms of access and land area, but a special school there might be considered out of proportion

to the immediate community (as is the case with Rowdeford).

- vi) Potential sites in Chippenham and Trowbridge: There is no available space on any of the agreed free school sites in Chippenham (the St Nicholas proposal) that would ensure that both schools met minimum recommended DfE areas. However, the council owns other land in these areas which could potentially provide special school sites. Chippenham and Trowbridge being a strategic development areas, such a focus could be an appropriate long-term investment. Capacity would need to be carefully matched to demand in order to ensure that Wiltshire pupils were catered for rather than those from other areas.

68. From this exploration it appears that the options for expanding capacity in the north are:

- i) “Modest” expansion of Rowdeford
- ii) Expansion of Larkrise using the additional Ashton St site
- iii) New build at Chippenham, Trowbridge or Rowde

Expanding Capacity (4): Options/Conclusions

69. *Downland, Springfield, Exeter House* - continue to manage planned growth. LA decisions on Planned Admission Numbers and age ranges can be dealt with operationally. Where consideration of a Downland/Springfields merger was considered as a matter which might have been looked at in the programme of work in 2017, further examination of pupil number projections suggests no compelling case for such a move on that basis.

70. *St Nicholas* – no solution has been found to continue the school in its current form or accommodate their proposals, except by a relocation and new build in Chippenham.

71. *Larkrise* - continuation depends on use of the Ashton St or other Trowbridge site. With a combined capacity of 230 the two adjacent Ashton St sites could accommodate both Larkrise and St Nicholas pupils, leaving a need for places in the north which could be accommodated at Rowdeford. A major new build project would be required, and the potential for Ashton St to be used for needed housing would be lost. Other potential Trowbridge sites are currently being explored.

72. *Rowdeford* – the “modest” expansion deemed possible technically could accommodate residual needs, although building constraints and maintenance costs would remain a problem.

73. *Rowde* village offers another potential site, close to Rowdeford school and Devizes, and centrally placed in the northern part of the county. It is next to a primary school with a drive-in facility from the main road, with sufficient land for a special school of up to 350 places.

74. *Chippenham* as a strategic development area offers opportunities for new build with good communication routes and infrastructure, and where the St Nicholas experience has demonstrated community/special school links which have worked well.

Merger/Other Options

75. The November report considered exploring a merger of St Nicholas and Larkrise with Rowdeford on existing sites, with a view to saving management costs. Merger could reduce back-office costs, but the need for leadership on site and co-ordination across three sites would make this an unattractive option for the long term. In any case, merger does not in itself address the need to expand schools.

76. The option of retaining the three northern cognitive difficulty schools on their existing sites is theoretically available, but is unattractive as it would require a c.200 place additional new build to add necessary capacity. Modelling costs of the two smaller schools with pupil numbers at DfE capacity (53+44) suggests that such reductions would increase unit costs with implications for viability. Whilst some schools of similar sizes exist elsewhere, that is likely to be based on different funding systems which support smaller schools. The current pressure on Wiltshire's high needs as well as schools' blocks of DSG militates against a change which would add costs to an already overspent budget. Add to that the proposition that there would be adjacent schools because of the new build, no capital receipts, the position of Ashton St would be unresolved without space for primary school expansion...and this option would look like a failure to grasp the issues.

77. Choices before us are practically about a choice of one or two or three schools to meet cognitive difficulty needs in the north.

1. One School

- i) This solution would be a large special school, probably one of the largest in the region, close to a mainstream primary school (Rowde) or school and other facilities (Chippenham/Trowbridge), with a new build and state-of-the-art modern facilities, and providing the opportunity for an iconic statement from the county.
- ii) Economies of scale would result from its size; care would need to be taken in the design to create human-scale spaces and places, but a "blank-sheet" start provides the opportunity for stakeholder involvement in design.
- iii) Transport costs are estimated to be marginally greater (£12k) than current (in the case of either location), calculated on current pupil numbers. Transport costs will increase with pupil number growth in any case.

- iv) Professionally the option would offer the benefits of providing the best opportunity for a major centre of excellence, the synergy of co-locating a comprehensive range of teams, skills and facilities, efficient operation for a full range of professional partners including health, and significant leadership capacity to take the concept and develop it through the first half of the 21st century.
- v) The aspiration to develop outreach support for mainstream schools and a SEND network on a hub-and-spoke model with resource bases could operate from a single centre of leadership.
- vi) In the process there would be the option of releasing school sites at Chippenham, Trowbridge and Rowdeford for other use. Additionally, positive action could be taken on the Ashton St Trowbridge site. The advantage of releasing two Trowbridge sites would lie in the potential to support developments in both housing and school provision, each needed in the town.
- vii) Such a project would involve significant change. However there would be firm commitment to work with parents and schools to ensure continuity of provision until any new arrangements were fully in place. With this option building would take place well away from pupils, being on an entirely new location. So moves would take place after new places were created: no door closes until a new one opens.
- viii) Costs are identified at the end of the report under the “financial implications” heading. Building on a single green-field site and maximising the release of other sites makes this relatively attractive as an option.

2. *Two Schools*

In this solution, the schools would be of above-average size with some economies of scale and comparable transport costs. Options are:

- i) *Split-site Trowbridge as above with Rowdeford.* This would provide a lower level of disruption, two schools appearing to continue with expansion and refurbishment. However, building works on site during the operation of the schools might be difficult to manage. The two schools would be a reasonable distance apart, their sites known, and the change could be achieved by one closure (St Nicholas) and development of two existing schools under their current leadership. Compromises would result from the nature of Rowdeford House, and the need for split-site operation at Trowbridge, with constrained access through residential streets and with an adjacent primary school. Capital receipts and costs would be lower, but working on currently used or brownfield sites would incur costs, potentially including demolition.

- ii) *New build in the Trowbridge area and in Chippenham:* Options for green-field sites near Trowbridge are being explored.
- iii) *New build at Chippenham or Rowde with Rowdeford.* With a 200+ place new build in Chippenham/Rowde/Trowbridge having many of the advantages but not the scale of the one-school option, this could be achieved with a minimal level of change at Rowdeford, allowing its retention. Compromises at Rowdeford would still apply as noted in the due diligence work. It would be unusual to have two similar schools so close together (within 2 miles) as with the Rowde option, and the stark choices for parents between an iconic new build and a 200 year-old Regency mansion would need to be managed because of the apparent inequity of provision.
- iv) Chippenham appears a better option than Rowde in this (or the one-school) scenario, for its proximity to town facilities including mainstream schools, and its future as a strategic growth area. Trowbridge might prove to be an option confirmed through consultation.
- v) *New build with Trowbridge split site.* New Build at Chippenham (or Rowde) and Trowbridge - comments as above. This would be the better of the new/old options, providing a more suitable geographical spread, and in fact a substantially new-built provision at Trowbridge. St Nicholas and Rowdeford would cease to operate. The last two options would release sites for other use, the Trowbridge sites probably being the more useable.

3. *Three Schools*

- i) A three school solution provides the option to accept the special schools' proposals, by:
 - relocating St Nicholas in Chippenham with a new build accommodating current numbers and future growth;
 - expanding Larkrise by use of the Ashton St site;
 - addressing maintenance issues at Rowdeford.
- ii) This pattern of provision would reflect the current one, with community links noted particularly in Trowbridge and Chippenham, and could solve the current overcrowding and future growth issues. It would be likely to command support from the current schools' leaders, and would also reflect the fact that in parallel the council is broadly agreeing with other schools' proposals for ASD, SEMH in the north and provision in the south. Reflecting those proposals, schools would see co-ordination arising from the overarching trust-type body suggested by the schools (see para 57).
- iii) The council and stakeholders would need to consider whether this way forward would represent an equitable, pattern of provision, or whether

its diversity was a benefit given the compromises inherent in the maintenance of a special school provision at Rowdeford in particular.

Overview and Scrutiny Engagement

78. Children's Select Committee established a member task group to consider these issues. Presentations were made to the group by officers, visits to schools were undertaken and representations received from stakeholders

Safeguarding Implications

79. There are no anticipated safeguarding issues arising from this proposal.

Public Health Implications

80. The provision of education, especially in a SEND context, positively contributes to population health and wellbeing. Access to education plays a vital role in providing the foundations needed to ensure that pupils have the best start in life, given them the ability to learning and understand about health and wellbeing and have the opportunity to live healthier lives.

Procurement Implications

81. None at this stage; the potential in due course would be for building contracts which would be let according to the council's policies

Equalities Impact of the Proposal (detailing conclusions identified from Equality Analysis, sections 4 and 5)

***Section 4 – Conclusions** drawn about the impact of the proposed change or new service/policy

The main impacts are Wiltshire Council and the Special schools will have clear proposals, understood and influenced by stakeholders, that will mean we are better able to:

- Meet the educational needs of the growing number of children and young people who need a special school place
- Ensure that the right SEN school places are available in the right parts of the county, thus reducing travel time and enabling young people to benefit from their local community and specialist educational provision
- Work together to strategically review, plan and deliver the specialist education that children and young people with SEN need
- Manage the costs associated with increase in demand for special school places

- Meet the responsibilities within the Children and Families Act 2014 to consult on proposals and put forward proposals that will secure and develop quality provision.

The cost of the re-provisioning is significant. However, if this proactive plan is not considered the alternative would be to have no plan, leading to a continued escalation of unsustainable cost leading to more children and young people being placed away from their communities.

The actual proposals will be tackled following this consultation in a separate equalities assessment based on the proposals that are accepted.

***Section 5 – How will the outcomes from this equality analysis be monitored, reviewed and communicated?**

There is set process that is laid out by the DfE regarding how the consultation and how the decision is communicated. The consultation will take place over three months through May 2018 to September 2018.

Consultation responses will then be brought back to cabinet for decision making and will be published through the Wiltshire Council website and to all stakeholders. This will include any information pertaining to equalities.

The overall process will be monitored within the commissioning and directorial responsibilities of the Children and Families services within the Local Authority and is also a matter being taken on by a Scrutiny task group.

Environmental and Climate Change Considerations

82. Any new build ultimately arising from the sequence of events discussed here would be subject to planning, design and building regulations consistent with addressing these factors

Risk Assessment

83. Standard processes will apply – see below.

Risks that may arise if the proposed decision and related work is not taken

84. The risk is that the council would fail in its duty to secure sufficient places for pupils with special educational needs, and would rely on an uncertain future supply of independent special school placements with resulting challenges, tribunals and extra costs, placing an excessive and unnecessary burden on council resources. The potential to significantly worsen the existing overspend of high needs block (estimated at £3-4m/year over this period) is seen as a critical risk which must be addressed by creating local special school provision.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

85. Risk are around managing an interim period of pressure on special school places before new long-term arrangements are in place, around the practicalities of any ultimate building projects, and reputational risks arising from what might be seen as controversial and high-profile policy development and implementation. Effective project management and communications systems will be put in place to mitigate those risks.

Financial Implications

Funding for specialist provision

86. The revenue cost of special school provision is funded from the high needs block of the Dedicated Schools Grant (DSG). The high needs block has been under significant pressure in recent years and has been consistently overspent. This overspend has previously been offset by underspends in other areas of the DSG, however DSG reserves are expected to be substantially reduced at the end of 2017-18 and the implementation of a “hard” national funding formula for schools (expected in April 2020) will reduce any scope for pressures to be offset from the schools block of DSG in future years. As a result any overspend on the high needs block could become a cost pressure for the Council.

87. The table below shows the estimated growth in the high needs block over the period to 2026:

Estimated High Needs Block allocation	Actual	Actual								
	2017-18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m
Baseline position with proposed national formula	47.148	45.079	47.619	47.619	47.681	47.743	47.903	48.063	48.172	48.281
Additional basic per pupil entitlement for census				0.062	0.062	0.16	0.16	0.109	0.109	0.109
Estimated High Needs Block allocation	47.148	45.079	47.619	47.681	47.743	47.903	48.063	48.172	48.281	48.39

88. In this forecast it is assumed that:

1. The impact of the additional £1.3 billion added nationally is reflected in 2018-19 and 2019-20 but no further national increases to the quantum are assumed after that.
2. Basic entitlement funding of £4,000 (plus area cost adjustment) per pupil in a special school will increase as in house places are provided
3. No increase for population growth or changes to proxy indicators are assumed at this stage however these will be updated each year

89. Capital funding for increases in school places is allocated through the government’s basic need allocation. This allocation covers mainstream schools only and therefore does not cover provision of special school places. Support through s106 agreements is also targeted at mainstream places. Therefore the local authority has no direct source of capital for the provision of special school places.

90. A number of options for sourcing capital will therefore need to be explored, some of which will mitigate the cost to the Council through accessing capital funds from the government or through academy trust partners, or through realising capital receipts from vacated sites, but Cabinet needs to be aware that the full cost of financing the capital development could fall to the Council's general fund and is not currently budgeted for. Potential funding sources for capital include:
- a. Regional Schools Commissioner – not to rule out the free school route which had been available until recently;
 - b. Academies locally include two Wiltshire special schools, which might have access to capital for growth;
 - c. Release of school sites might yield capital receipts, subject to the educational case being made;
 - d. The LA has non-school sites which could produce capital;
 - e. Local Authority borrowing to support the capital programme.
91. It should be noted that the Council has received an allocation of SEN Capital Funding amounting to £800,933 over 3 years from April 2018 to support the provision of places. In the first instance this allocation is to be utilised in the development of ASD/SEMH places in the south of the county. This allocation is clearly insufficient to support the development of new provision outlined in this report.

Revenue Implications of meeting overall demand

92. As detailed in the body of the report, demand modelling for special school places indicates a need for an additional 220 special school places by 2026 for all types of need. Without the provision of additional places within Wiltshire schools demand will need to be met by the independent sector. This would be at a higher unit cost than in Wiltshire schools and there is a likelihood that the current local market would not meet the increase in demand.
93. The table below compares the costs of top-up payments for pupils in specialist provision (in special schools and mainstream) if demand for special school places is met through the development of in house provision with the cost of meeting demand through the independent sector.

Place & Top Up Expenditure Projected on estimated demand										
	2017-18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m
Projected Spend if no change to in house provision - assumes Special School Place numbers remain constant, additional places purchased from Independent Sector	39.398	40.464	41.530	44.281	47.031	48.905	50.779	52.652	54.526	54.526
Projected Spend if in additional special school places developed within Wiltshire provision	39.398	39.728	40.058	40.910	41.761	42.341	42.921	43.501	44.081	44.081
Estimated Cost Avoided if increase in house provision	0.000	(0.736)	(1.472)	(3.371)	(5.270)	(6.564)	(7.858)	(9.151)	(10.445)	(10.445)

94. The assumptions used in the analysis are:

1. The table shows the costs of all place and top up payments to special and mainstream schools
2. Demand for all other specialist provision (Resource Bases and provision in mainstream schools) remains unchanged – this provision will also be affected by the increase in housing development etc but will be the subject of further reports as strategies to meet demand are finalised
3. It is assumed that provision in the independent sector is unlikely to be met locally and therefore unit costs reflect additional residential costs
4. Costs of in house provision are calculated at the current average cost for day provision in Wiltshire special schools
5. Other spend from the high needs block, such as spend on alternative provision and staffing, is not included here. The total spend on other high needs block functions is approximately £9 million.

95. Using this model it is estimated that through developing special school provision within Wiltshire to meet the increase in demand, revenue costs of up to £10.4 million would be avoided over the period to 2026, with in house provision continuing to be at lower cost beyond that. The report details how provision in the south of the county is expected to be developed with academy partners and proposes the development of an increase in special school places from complex provision in the north to the county.

Revenue Implications of this Proposal

96. The proposals in this report for a 350 place complex needs school in the north of the County are designed to provide 50 of the additional places required to meet demand, and to address the estates issues in the existing schools

97. The revenue implications to the Council of all options being considered to deliver these 50 places are considered to be the same. The options being considered all look to provide 350 places in Wiltshire special schools, which represents an additional 50 places compared with current complex needs

provision in the north. The costs to the Council of the additional places would be 50 places at £10,000 per place plus a top up payment per pupil. The average top up payment for Wiltshire special schools is estimated at £11,285 although individual payments vary according to complexity of need. Top up payments are only paid when a pupil is on roll in a school. This compares to an average cost in the independent sector of £68,000 (assuming an element of residential provision). Over the same period demonstrated in the overall model, with the same profiling of places coming on stream, this proposal would lead to costs avoided of £3.4 million to 2026 for these 50 places. Ongoing savings are approximately £2.4m per annum

98. Whilst the revenue cost to the Council of the different options would be the same, it is expected that larger schools could achieve efficiencies and economies of scale, particularly in back office costs and management structures, compared with the current small schools.
99. It is likely that there would be set up costs associated with the establishment of a new school that might require some up-front funding of a number of places prior to pupils occupying the site. This would need to be met from the high needs block. Set up costs may vary according to a 1 school or 2 school option, with a two-school model likely to be more costly.
100. The impact on home to school transport costs would also need to be understood as proposals are developed and sites for the new schools identified. The cost of home to school transport is met from the council's budget.
101. Capital financing costs would also be a revenue cost pressure to the Council depending on the sources of capital. These are assumed at approx. 10% of the amount borrowed.

Capital Costs

102. Capital investment would be required in order to develop provision to meet demand. It is estimated, based on benchmarking of costs against other special school builds, that the net capital exposure could be in excess of £20-£40 million depending on realisable capital receipts and the number of schools to be built.
103. An initial assessment of the capital implications can be summarised as follows:

	350 place school	2 schools with Rowdeford remaining	3 schools – relocate St Nicholas and Larkrise, Rowdeford remain
Estimated net capital cost (depending on realisable receipts and estimated costs of single versus multiple site build)	£20-28m	£29-£43m	£27-£42m
Other opportunity costs/savings	May release other sites eg Ashton Street for development May free up site for primary provision in Trowbridge	May result in Ashton Street not released for development	Ashton Street site not released for development and less efficient use of site for fewer places

Overall Cost Summary

103. The following table summarises the costs and savings associated with the proposed options outlined in this section

Overall Summary of costs to meet demand for Complex Needs in North of County (50 additional places)				
	Independent Sector provision	350 place school	2 schools with Rowdeford remaining	3 schools – relocate St Nicholas and Larkrise, Rowdeford remain
	£m	£m	£m	£m
Revenue Cost per annum of 50 Additional Places per annum	3.438	1.064	1.064	1.064
Cost avoided 2018-19 to 2026-27		(3.371)	(3.371)	(3.371)
Ongoing revenue cost avoided per annum for full 50 places		(2.374)	(2.374)	(2.374)
Estimated net capital cost (depending on realisable receipts and estimated costs of single versus multiple site build)		£20-28m	£29-£43m	£27-£42m
Approximate annual Costs of Borrowing (based on mid range capital cost)		2.400	3.600	3.500

Legal Implications

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104. Changes in school provision are subject to legal processes where there is a “significant change in character”, school closure or establishment.
105. In this case the proposals relate to building capacity for the future in the north of the County and it is appropriate to ensure that Cabinet are fully informed to enter into a pre-statutory consultation phase and is consistent with the SEND Code of Practice (2015) expectation to consult and engage with parent/carers on any development and change of practice.
106. Throughout this process regard must also be had to the Council’s statutory Public sector equality duties under section 149 of the Equality Act 2010.

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18 April 2018

Wiltshire Council

Cabinet

15 May 2018

Subject: Wiltshire Housing Site Allocations Development Plan Document - Proposed Submission

Cabinet Member: Councillor Toby Sturgis - Planning and Strategic Asset Management

Key Decision: Yes

Executive Summary

The Wiltshire Core Strategy (adopted January 2015) plans for housing to come forward through several sources including: strategic site allocations, neighbourhood planning, planning applications and site allocations plans. The Council's Local Development Scheme presents a commitment to prepare two site allocations plans, as anticipated by the Wiltshire Core Strategy. The Chippenham Site Allocations Plan was adopted by Council on 16 May 2017 and plans for the delivery of homes and employment opportunities at Chippenham. The Wiltshire Housing Site Allocations Plan is being prepared for the rest of Wiltshire.

Consultation has now been undertaken on the 'Wiltshire Housing Site Allocations Plan - Pre-submission draft plan (June 2017)' (the draft Plan), following approval by Cabinet on 20 June 2017. This draft Plan has been prepared to:

- (i) Allocate new sites for housing to ensure the delivery of the Wiltshire Core Strategy housing requirement of at least 42,000 dwellings (2006-2026) and maintain a five-year housing land supply in each of Wiltshire's three Housing Market Areas over the period to 2026; and
- (ii) Review, where necessary, settlement boundaries (or 'limits of development') in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages.

The formal consultation stage, where representations are invited on the soundness of the Plan, ended on 22 September 2017. At the close of consultation approximately 3,370 comments had been received approximately 970 consultees. In broad terms, most of the comments were concerned with the purpose of the plan and its methodology for selecting sites. A considerable proportion of the representations focussed on the proposed site allocations in Trowbridge and Salisbury. A more limited response related to the settlement boundary review proposals.

Having reviewed the comments received, Officers consider there are none which raise fundamental issues of soundness that would preclude the submission of the Plan to the Secretary of State for Examination. As explained in the report they generally present different interpretations of the evidence base or raise concerns regarding individual sites which is to be expected at this stage of the process.

The National Planning Policy Framework (paragraph 216) anticipates that 'unresolved objections' will need to be addressed through the Examination process. To inform and assist the Examination process a number of 'changes' are proposed to the draft Plan that respond to representations received for consideration by the appointed Inspector. These 'Proposed Changes' are categorised as either being 'minor' - i.e. not affecting the substance of the draft Plan, or 'main' - i.e. they affect the content of the draft Plan and hence will be considered through the Examination.

The next stage involves the submission of the draft Plan and other documents prescribed by legislation to the Secretary of State, who will appoint an Inspector. The Plan and all submitted evidence, including the representations received through the formal consultation undertaken in 2017, will then be independently and robustly examined in terms of legal compliance and soundness.

Subject to Cabinet endorsement and Council approval, submission of the draft Plan, together with the Proposed Changes, will be possible by end June 2018. This accords with the latest Local Development Scheme (September 2017) and will ensure that the Council continues to make timely progress with its Local Plan and improve the supply of housing land.

Endorsement of the Proposed Changes is therefore sought along with delegated authority to proceed with the next stages to enable the Plan to move through the submission and Examination stages as efficiently as possible.

Proposals

That having considered the outcome of the formal consultation, Cabinet:

- (i) Endorses the draft Plan as sound and legally compliant, as set out **Appendix 1**;
- (ii) Endorses the schedule of Proposed Changes to the draft Plan in Appendix 1, as set out in **Appendix 2**, for submission to the Secretary of State for Housing, Communities and Local Government to inform and assist the Examination process;
- (iii) Recommends that Council approves the draft Plan together with the Proposed Changes and supporting information for submission to the Secretary of State to commence the independent Examination process subject to amendment in (iv);

- (iv) Authorises the Director of Economic Development and Planning in consultation with the Director of Legal and Democratic Services and the Cabinet Member for Planning and Strategic Asset Management to:
- (a) make any necessary changes to the Plan and supporting documents in the interests of clarity and accuracy before it is submitted to the Secretary of State;
 - (b) make appropriate arrangements for submission of all documents relating to the Plan, including the supporting evidence (including the Equalities Impact Assessment required by Section 149 of the Equalities Act 2010 at **Appendix 6**), to the Secretary of State;
 - (c) make all the necessary arrangements for Examination including - the appointment of a Programme Officer, the undertaking and/or commissioning of other work necessary to prepare for and participate at the Examination; and the delegation to officers and other commissioned experts to prepare and submit evidence to the Examination and where necessary, appear at any hearing sessions and represent the Council;
 - (d) authorise that officers request that the Secretary of State recommends modifications to make the Plan sound in accordance with Section 20 (7C) of the Planning and Compulsory Purchase Act 2004 (as amended); and
 - (e) implement any consequential actions as directed by the Inspector relating to the Examination, including undertaking any consultation where necessary, in order to respond to matters raised through the Examination.

Reason for Proposal(s)

To ensure that progress continues to be made on maintaining an up-to-date development plan for Wiltshire, in line with the timetable set out in the Council's Local Development Scheme and statutory requirements.

In accordance with legislative requirements, the proposed resolution enables the submission of a sound Plan. The Council will need to approve the submission of the Plan to the Secretary of State for Examination.

Alistair Cunningham - **Corporate Director, Growth Investment and Place**

Wiltshire Council

Cabinet

15 May 2018

Subject: Wiltshire Housing Site Allocations Development Plan Document - Proposed Submission

Cabinet Member: Councillor Sturgis - Planning and Strategic Asset Management

Key Decision: Yes

Purpose of Report

1. To:
 - (i) Update Cabinet on the outcome of the formal consultation on the 'Wiltshire Housing Site Allocations Plan - Pre-submission draft plan (June 2017)'.
 - (ii) Seek Cabinet's recommendation to Council that the Plan, together with the schedule of Proposed Changes, should be approved for the purposes of submission to the Secretary of State and commencement of the independent Examination process.
 - (iii) Seek delegated authority to make appropriate arrangements for submitting the prescribed documents and supporting materials to the Secretary of State; and respond to any consequential actions as directed by the Inspector relating to the Examination.

Relevance to the Council's Business Plan

2. Progression of the Plan through the Examination process and on towards adoption will enable the sustainable delivery of new homes in line with the Wiltshire Core Strategy and overarching aims of the Business Plan 2017-2027 'Forward Thinking'. One of the four priorities, 'Growing the Economy', recognises the importance of improving housing supply. Progression of the Plan will help deliver the Council's aim to ensure "*Development where it is needed*" under the "*Housing and Environment (sustainable development)*" goal in the Business Plan.

Background

3. The Wiltshire Core Strategy (adopted January 2015) sets out a strategic approach to the delivery of sustainable development over the period 2006-2026. It anticipates that housing will come forward through a variety of sources, including: strategically important sites (e.g. Ashton Park, Trowbridge); neighbourhood plans; planning applications (e.g. windfall development); and site allocations development plan documents. In

addition, the Wiltshire Core Strategy recognised that ‘settlement boundaries’ (or ‘limits of development’) would need to be reviewed to ensure that they are up-to-date.

4. The need to bring forward new homes through site allocations plans was identified to provide a surety of housing land supply across Wiltshire’s three Housing Market Areas over the period to 2026. The ‘Wiltshire Housing Site Allocations - Pre-submission draft Plan (June 2017)’ (the draft Plan) has been prepared in conformity with the Wiltshire Core Strategy and seeks to:
 - (i) Allocate new sites for housing to ensure the delivery of the Wiltshire Core Strategy housing requirement of at least 42,000 dwellings (2006-2026) and maintain a five-year housing land supply in each of Wiltshire’s three Housing Market Areas over the period to 2026; and
 - (ii) Review, where necessary, settlement boundaries (or ‘limits of development’) in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages.
5. The Settlement Strategy (Core Policy 1) and the Delivery Strategy (Core Policy 2) together with the relevant Area Strategy Core Policies (Section 5) of the Core Strategy guide where and how much development should take place to provide a sustainable pattern of growth over the period 2006-2026.
6. Core Policy 2 sets out housing requirements on the basis of Housing Market Areas (HMAs) and indicative requirements are provided in the Area Strategy Policies for: Wiltshire’s Community Areas; the Principal Settlements and Market Towns; and, in the South Wiltshire HMA, the Local Service Centres. These figures are not intended to be prescriptive minima or maxima and instead are meant to be viewed as an indication of the general scale of growth appropriate for each area and settlement during the period up to 2026. The figures are therefore expressed as ‘approximate’ or ‘about’. In accordance with Core Policy 2, sites for housing development may come forward through new allocations on the edge of settlement boundaries where they are identified in neighbourhood plans or site allocations plans.
7. On 16 May 2017, Council adopted the Chippenham Site Allocations Plan, which reviewed the settlement boundary of Chippenham and allocates land for 2,050 homes at the town. The draft Plan complements the Chippenham Site Allocations Plan in reviewing settlement boundaries and providing land for additional homes, where needed, elsewhere in the County consistent with the Core Strategy and its spatial strategy.

Main Considerations for the Council

8. As a subsidiary document to the Core Strategy, the draft Plan has a specific purpose, namely, to support the delivery of the housing

requirements and furtherance of the Area Strategies, including the review of settlement boundaries. Therefore, the draft Plan does not provide an opportunity to revisit the strategic policies within the Core Strategy, for example the status of settlements, or the broad disaggregation of housing requirements.

9. Work on the draft Plan commenced in March 2014 when the Regulation 18¹ consultation on the proposed scope of the draft Plan was carried out. At the same time, there was an open 'call for sites' to enable interested parties to put forward land for consideration through the draft Plan. Informal, targeted consultation was undertaken on: draft proposals for amending settlement boundaries (July to September 2014); a draft site selection methodology and initial site options (February to March 2015); and further consultation on the approach to Large Villages (June to August 2015). Details of these consultations together with the representations received and Council's response is set out in the report on the Council's website via [this link](#).
10. Cabinet on 20 June 2017 considered and approved the 'Wiltshire Housing Site Allocations Plan - Pre-submission draft plan (June 2017)' (draft Plan) for the purpose of undertaking a formal stage of consultation.
11. The overall level of growth proposed for allocation in the draft Plan is 2,465 homes; with 1,205 homes in the North and West HMA (14 sites), 350 homes in the East HMA (4 sites) and 910 homes in the South HMA (6 sites). Where appropriate, it also proposed revisions to settlement boundaries to ensure they properly reflect development that has occurred since they were first established and a consistent approach is taken across Wiltshire. This was except for those boundaries that had recently been reviewed through sufficiently advanced neighbourhood plans and did not require further updates to take into consideration implemented development. Methodologies underpinned both the site assessment process and settlement boundary review, which have been published alongside the Agenda (see Topic Papers 1 and 2 provided as supporting documents to this report).
12. Consultation took place on the draft Plan, as set out in **Appendix 1**, for a period of 10 weeks, commencing 4 July 2017 and ending 22 September 2017. During the first two weeks of the consultation four public exhibitions were held at Chippenham, Salisbury, Devizes and Trowbridge.
13. Full details of this consultation, together with a summary of the representations received and the Council's response is set out in the consultation statement, which has been published alongside the Agenda. This is known as the Regulation 22 (1) (c) Statement².
14. At this stage in the process, if the Council wishes to make any changes to the draft Plan to address matters arising from the Regulation 19 consultation, the (Procedural Practice in the Examination of Local Plans,

¹ Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

² Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

The Planning Inspectorate, June 2016) gives the Council a choice as to how to proceed:

- (i) The changes could be prepared as an addendum to the draft Plan. Any such modifications would be subject to further consultation and Sustainability Appraisal before submission to the Secretary of State for Examination in order that the Inspector appointed to Examine the draft Plan can consider these as part of the submitted plan. This further consultation would lead to a delay to the submission of the draft Plan at a time when the Government are urging Local Planning Authorities to make timely progress on their Local Plans and to boost the supply of housing. The Local Development Scheme anticipates submission of the draft Plan in June 2018; or
- (ii) The Council can submit to the Secretary of State a schedule of Proposed Changes to inform and assist the Examination process. By virtue of Section 20(7C) Planning and Compulsory Purchase Act 2004 (as amended) the Inspector appointed by the Secretary of State to Examine the draft Plan can recommend that these modifications and any other modifications that arise through the Examination process are made in order to resolve matters of legal compliance and soundness. However, the Council must make a formal request under Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended) for this to happen. In these circumstances, any modifications that arise through the Examination process and recommended by the Inspector would then be the subject to consultation and Sustainability Appraisal before the Inspector can make his or her final recommendations through a report to the Council and close the Examination. Following this process and submitting the draft Plan in June 2018 for Examination would be in accordance with the Council's current Local Development Scheme.

It is considered that the second option would provide the most pragmatic option to ensure timely progress can be made.

Representations on the draft Plan

15. At the close of the consultation on the draft Plan, approximately 3,370 comments had been received from approximately 970 people or separate organisations. One petition consisting of 5 'e-signatures' relating to the proposed housing allocations at Netherhampton Road, Salisbury was received during the consultation period. A further 237 paper-copy signatures were added to this petition after the consultation period closed. In the weeks following the close of the consultation period, approximately 30 additional comments were also received. These comments were logged separately and marked as 'unduly made' representations as they were not submitted within the consultation period. Whilst these representations were submitted late, they will nonetheless be sent to the Secretary of State along with all other submission documents to ensure that the appointed Inspector has a record of all representations.

16. In broad terms, most of the comments were concerned with the purpose of the draft Plan and its methodology for allocating land for housing. Moreover, a considerable proportion of the representations from local communities focussed on the proposed site allocations in Trowbridge and Salisbury. These tended to focus on detailed technical matters such as flood risk, surface water drainage, landscape, ecology and highways; which have been addressed through the Council's evidence base. Highway's England were particularly concerned about the impact of further development on A36. The Council has now prepared draft transport strategies for Trowbridge and Salisbury, which outline the approach to mitigation to support the site allocations. These are provided as supporting documents to this report.
17. In terms of other matters raised, a more limited, but nonetheless important, number of responses concentrated on the settlement boundary review proposals. The settlement boundary review is discussed in more detail at Paragraph 45 below.
18. As provided by legislation³ the Council is required to submit a statement setting out, amongst other matters, the 'main issues' raised in this formal stage of consultation⁴. As the Council is not required to respond to every individual comment or objection raised through the consultation, the main issues are in effect a summary of comments submitted.
19. The main issues raised through the consultation, including the public exhibitions, ranged from: wholesale objections to the methodology employed to identify sites and address the review of settlement boundaries; through to detailed site-specific concerns with individual site proposals. These are set out in Section 7 and Appendix M of the consultation statement, which is published as a supporting document to this report. Some of the more substantive main issues outlined in the representations that challenge the soundness of the draft Plan relate to the following issues and are discussed further below:
- (i) Proposed level and distribution of housing within the draft Plan
 - (ii) Omission sites
 - (iii) Ecological matters
 - (iv) Heritage matters
20. Paragraphs 44 and 45 then go on to set out the updated position with regard to the Council's housing land supply position and the effect of the draft Plan.
- The proposed level and distribution of housing within the Plan*
21. A considerable number of responses queried the level and distribution of housing proposed in the draft Plan. In general, these came from the development industry. They call for greater consistency, flexibility and

³ Regulation 22 (1) (c), Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended),

⁴ Regulation 19, Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

choice in terms of the identification of broad 'areas of search'; and allocation of sites. At the heart of this issue is the concern that the draft Plan is not identifying enough land for housing through allocations and therein failing to deliver the surety of supply it is intended to deliver. These comments therefore challenge the methodology employed to identify 'areas of search' and individual sites.

22. Allied to these concerns, comments received from housebuilders and promoters of the sites proposed for allocation called for the Council to make best and most efficient use of the land. The concern here revolves around the fact that the evidence used to support the proposals in the draft Plan was based on the delivery of 30 dwellings per hectare and then applying mitigation measures to address environmental concerns. The National Planning Policy Framework (e.g. paragraph 17 - Core planning principles) advocates the effective use of land. Indeed section 11 of the latest consultation draft of the National Planning Policy Framework reinforces the need to continue to do so. It is therefore clear that in line with national policy, increased densities on sites should be encouraged, provided the character and infrastructure capacity of local areas can accommodate such proposals.
23. Having reviewed the densities in the light of the consultation responses, it is considered that there is the potential to increase the overall housing numbers on certain sites whilst ensuring the provision of necessary mitigation measures. Therefore, it is considered that Proposed Changes relating to the deliverable quantum are recommended in respect of the following site allocations:
 - H2.1, Elm Grove Farm, Trowbridge (potential increase of 50 dwellings);
 - H2.2, Land off A363 at White Horse Business Park, Trowbridge (potential increase of 75 dwellings);
 - H2.3, Elizabeth Way, Trowbridge (potential increase of 150 dwellings); and
 - H2.5, Upper Studley, Trowbridge (potential increase of 25 dwellings).
24. Additional information will be prepared in support of the increased densities to illustrate to the Inspector how they can be achieved. The potential increase in units at site allocation H2.1 is proposed to reflect an opportunity that has arisen in relation to the inclusion of land owned by Wiltshire Council (Elm Grove Field) in the site area. It is considered that the inclusion of this land would facilitate the timely delivery of a new primary school and improved recreation land in the local area. This is discussed further in **Appendix 3** and reflected in the Proposed Changes.
25. The approach taken to identifying sites in the rural areas also raised concerns. Comments were made that Large Villages and Local Service Centres across Wiltshire's three HMAs should have been identified as potential 'areas of search' to help address housing supply, irrespective of whether (or not) the indicative housing requirements for the Community Area Remainders had been met. As an adjunct to this point, concerns

were raised that Large Villages need additional homes to ensure people have access to affordable homes in rural areas; and communities continue to benefit from viable local services and facilities.

26. The relationship between the draft Plan and neighbourhood plans was also questioned particularly by the development industry. The concern being that too much reliance is being placed on neighbourhood plans to deliver housing when the availability and achievability of such sites is not rigorously tested through the basic conditions test. Conversely, responses from Market Lavington Town Council and Crudwell Parish Council considered that sites should be removed from the draft Plan and instead identified through the neighbourhood plan process.
27. In response to the above points, the key consideration relates to the relationship between the draft Plan and the Core Strategy. As explained in paragraphs 5 and 6, the overall housing requirement and its distribution is set by the Core Strategy. The draft Plan has been prepared in general conformity with it and seeks to deliver housing allocations in areas where the Core Strategy indicative requirements are yet to be met. This is to ensure a sustainable distribution of development consistent with strategic policies and the spatial strategy.
28. With regard to Large Villages, the draft Plan respects the Delivery Strategy (Core Policy 1) and Settlement Strategy (Core Policy 2) of the Core Strategy. The draft Plan only identifies sites where there is the strategic imperative to do so and supply should be supplemented. Whilst sites have been identified with the Local Service Centre of Market Lavington, there is no need to follow a similar approach in Cricklade, or other Local Service Centres due to either there being no indicative requirement to meet, or a sufficiently advanced⁵ neighbourhood plan in the area which identifies sites for housing.
29. The relationship between the draft Plan and neighbourhood plans is underpinned by a cogent and consistent methodology. Moreover, neighbourhood plans are independently examined to a standard consistent with legislative requirements. In this regard, they are a legitimate and reliable component of the overall housing land supply position. However, as set out in the site selection methodology, it is considered that only plans that are reasonably advanced⁴ can provide sufficient confidence that housing sites will be delivered. Therefore, while the neighbourhood planning process across Wiltshire is fully supported, the proposed allocation of sites for housing in Market Lavington and Crudwell is considered appropriate to provide certainty of housing supply and facilitate delivery of the relevant Area Strategies.

Omission sites

30. A considerable number of responses proposed alternative land for allocation in the draft Plan and challenged the assessment of sites. These

⁵ Where a neighbourhood plan has at least reached the Regulation 16 stage (Neighbourhood Planning (General) Regulations 2012 (as amended)) i.e. publicised by Wiltshire Council for consultation

sites are classified as 'omission sites' (i.e. they are not included as allocations within the draft Plan) and having assessed each site, they broadly fall into three categories:

- (i) they are situated within areas of search that were ultimately dismissed because it was considered there was no need to allocate land to help deliver the policy requirements set out within the Core Strategy; or
 - (ii) they fell within areas of search where the Council is seeking to deliver housing but had not been previously assessed through the site selection process; or
 - (iii) they are sites that have been assessed and rejected through the site selection process where further evidence has been provided to support some of the sites and challenge the Council's assessment.
31. With regard to sites falling under (ii) or (iii), new sites were taken through the assessment process or the information submitted challenging the Council's assessment of sites (e.g. in relation to Sustainability Appraisal scoring or technical information on matters such as drainage or archaeology) reviewed to see whether any changes would be justified. Having completed the further assessment work, it is considered that there is only one site that would score favourably against the site selection methodology meriting allocation. This is a small site for 14 homes at The Yard, Hampton Park, Salisbury. It is therefore proposed that this site forms a Proposed Change. The further assessment work undertaken is reflected in the updates of the Sustainability Appraisal and relevant Community Area Topic Papers by way of tracked changes, which have been published as papers supporting this report.

Ecological matters

32. In response to the consultation, Natural England and the Environment Agency raised concerns about the soundness of the draft Plan and the potential impact of proposed growth on the River Avon Special Area of Conservation (SAC), an internationally important wildlife site. They considered there to be insufficient evidence and certainty that development is unlikely to have an adverse effect on concentrations of phosphates within the River Avon SAC. In this regard, concerns were raised with the Habitats Regulations Assessment accompanying the draft Plan, which is published as a supporting paper to this report. This identified issues with the implementation of the Nutrient Management Plan (NMP)⁶ but concluded that with mitigation there are unlikely to be any adverse effects.
33. Phosphates in relation to the River Avon SAC is a complex and technical issue, as recognised by Core Policy 69 of the Wiltshire Core Strategy that relates to the Protection of the River Avon SAC and refers to the role of

⁶ River Avon Special Area of Conservation Nutrient Management Plan for Phosphorus (April 2015) - developed in partnership by Environment Agency, Natural England and Wiltshire Council

the Nutrient Management Plan (NMP) in managing phosphate levels. In simple terms, the reduction in phosphates anticipated through catchment sensitive farming practices has not been achieved. Since making their response to the draft Plan, Natural England and Environment Agency have confirmed that they will be reviewing some of the underlying assumptions in the NMP. As such, they have simplified their advice and require that development should be designed to be phosphate neutral.

34. Since the close of the consultation the Council has been working constructively with all relevant parties: Natural England, Wessex Water, the Environment Agency and neighbouring authorities (e.g. New Forest District Council) on the phosphates issue. Progress is being made on a 'Memorandum of Understanding' ('the MoU'), which has been drafted to set out the approach to identifying effective and proportionate measures to remove or off-set the phosphate load from qualifying developments and how the Council and all parties will work together. This will give greater certainty with respect to nutrient management, sufficient for the Council to conclude that the draft Plan will support phosphate neutral development that is unlikely to have adverse effects upon the integrity of the SAC. Significant and constructive progress has been made towards finalising the MoU. This will include a commitment to preparing additional work to identify in more detail the measures that will be required to offset phosphate inputs, in Wiltshire to be paid for by the Community Infrastructure Levy. A proposed change is recommended to the draft Plan to reflect the requirements of the MoU and ensure development proceeds in a compliant way. This is reflected in the Addendum to the HRA provided at **Appendix 4**.
35. Natural England also objected to the draft Plan through the consultation in respect of the proposals at Trowbridge on the grounds that a mitigation strategy to protect the integrity of the Bath and Bradford on Avon Bats SAC was not in place. Again, work has been progressed in respect of this matter and constructive dialogue with Natural England has taken place.
36. The issues at the heart of Natural England's objection relate to Core Policy 29 of the Core Strategy in terms of ensuring the impacts associated with further development at Trowbridge (loss of habitat and increased recreational pressure) are addressed. To this end, the Council commissioned work in July 2017 to investigate the nature of recreational pressure on large, publicly accessible open spaces including important bat habitats around the town. The findings led to a series of recommendations that are now being considered along with measures for offsetting loss of habitat, to provide a coherent, strategic approach to safeguarding the bats associated with the SAC.
37. Work is progressing on developing the Trowbridge Bat Mitigation Strategy in consultation with Natural England. It is anticipated that this will form part of the submission documents to support the draft Plan. It has been agreed that the Strategy will be delivered in two phases. Phase 1⁷ will focus on development coming forward within the timescale of the draft

⁷ A second phase will follow to provide a longer term strategy to support the Local Plan Review, which Plans for the period 2016 to 2036.

Plan, including both allocated land and windfall sites, identifying the nature of mitigation required mostly within the allocations themselves. It will collate all relevant ecological evidence available on bats at the town and provide recommendations to satisfy the Competent Authority (the Council), in consultation with Natural England, that the proposals in the draft Plan would not put at risk the integrity of the Bath and Bradford on Avon Bats SAC. To this extent, there are proposals already set out within the draft Plan for how development intends to mitigate its effects on bats including details on how it will bolster green infrastructure and maintain 'dark corridors' to provide continued permeability for bats in the urban/rural landscape; and requirements to contribute to the Trowbridge Bat Mitigation Strategy.

38. The Addendum to the HRA considers that together with the proposals included in the draft Plan to protect and buffer existing bat habitat, Phase 1 of the Trowbridge Bat Mitigation Strategy will be sufficient to ensure that adverse impacts to the SAC features will be avoided and the integrity of the SAC maintained.

Heritage Matters

39. Whilst the draft Plan has been prepared in the light of relevant legislation⁸ and national policy, Historic England submitted representations through the consultation that identified concerns with the Council's evidence on how development affecting designated and non-designated heritage assets had been justified. Whilst no 'show-stopper' concerns were raised in heritage terms Historic England was concerned about the potential scale of effects attributable to development and therefore the risk of harm to heritage assets. They considered that an impact assessment could not be deferred to a future planning application stage.
40. It was agreed with Historic England that a full, but nonetheless proportionate assessment of six of the proposed allocations would be undertaken to provide greater certainty to the evidence base. Consultants were commissioned to undertake a Heritage Impact Assessment, which is provided as a supporting paper to this report. The report adds to the Council's understanding of the various heritage assets associated with the six sites that were appraised.
41. The Heritage Impact Assessment produced for the Council naturally reflects statutory⁹ and national planning policy advice and takes a precautionary approach to the assessment of heritage assets and the degree to which their significance would be harmed by development proceeding. However, the assessment nonetheless concludes for all sites that the scale of harm would be less than substantial and for two site allocations (H2.3 Elizabeth Way, Trowbridge; H2.4 Church Lane, Trowbridge) there were low risks associated with development and can proceed as allocations. The report identifies more significant risks with proceeding with the H2.6 Southwick Court (Trowbridge), H2.2 Land off A363 at White Horse Business Park (Trowbridge), H2.7 East of Dene

⁸ Planning (Listed Buildings and Conservation Areas) Act 1990, Sections 66(1) and Section 72(1)

⁹ Planning (Listed Buildings and Conservation Areas) Act 1990, Sections 66 and 72

(Warminster) and H3.3 Land North of Netherhampton Road (Salisbury) site allocations that merit further consideration.

42. As defined by paragraph 134 of the National Planning Policy Framework, where a proposed development would lead to 'less than substantial harm' to the significance of a designated heritage asset (which can be of varying degrees of severity), should be weighed against the public benefits of development proceeding. This, together with an explanation of less than substantial harm, is discussed in more detail in the 'Heritage Note' at **Appendix 5**.
43. Having carefully considered the evidence and options it is considered that there is no justification for recommending deletion of the proposed sites on heritage grounds. However, in the light of the HIA and comments by Historic England, it is considered that Proposed Changes should be made that emphasise the special regard that needs to be applied to conserving heritage assets in a manner appropriate to their significance. These are set out in **Appendix 2**.

Updated Housing Land Supply Figures

44. The draft Plan refers to housing supply figures that, although with a base date of 1 April 2017, were estimated. Since then the 'Housing Land Supply Statement, Base date: April 2017 (March 2018)' has been published. It is therefore proposed that changes are made to show the most up to date figures alongside those that informed the draft Plan (See Annex to **Appendix 2** and the Addendums to Topic Papers 3 and 4). These updated figures show that the five year land supply position has changed and that, for the South Wiltshire HMA only a five year land supply with appropriate buffer (5%) can be demonstrated up to 2022. This change is mainly attributed to the mixed use strategic site at Churchfields for 1,100 dwellings (Core Policy 20, Wiltshire Core Strategy) no longer being considered deliverable in the period to 2026 and a lower density delivered on the Kings Gate site at Amesbury. The proposed increased densities at the allocation sites, as set out in the Proposed Changes (see paragraph 23 above), would contribute an additional 300 homes to the housing land supply in the North and West Housing Market Area, helping improve supply at Trowbridge consistent with the Core Strategy.
45. As is recognised in paragraph 4.32 of the draft Plan, additional allocations can be identified to supplement supply through the Wiltshire Local Plan Review, which is underway and plans for the period 2016 to 2036. This is programmed for adoption early 2021. Whilst it is considered that the Plan as submitted is sound, the examination process enables the Inspector to make such recommendations to the Council as he or she considers necessary under Section 20 (7C) of the Planning and Compulsory Purchase Act 2004 (as amended), which may include adding sites to the supply.

Settlement Boundary Review

46. The comments received in respect of the draft proposals for reviewing settlement boundaries focussed largely on the rationale for including, or excluding land. Having considered the representations, the overall method remains sound. However, it is considered that some changes should be made to the proposed settlement boundaries to address inconsistencies with the application of the methodology, as set out in Topic Paper 1: Settlement Boundary Review Methodology (June 2017), where appropriate to do so in the light of the representations received. Appendix A of Topic Paper 1 has been updated to reflect where settlement boundaries have now been reviewed through a sufficiently advanced neighbourhood planning process (Christian Malford, Cricklade and West Lavington). In line with the latest published housing land supply data, the Proposed Changes also include the most up-to-date position in respect of housing completions and commenced development at settlements as at April 2017. The Proposed Changes to the boundaries arising from the consultation are explained as tracked changes to the Community Area Topic Papers, which are published as supporting documents to this report.

Summary

47. Having considered the representations received through the formal consultation, a number of 'main issues' have been identified that are considered likely to form the basis of the Examination process. It is considered that a schedule of Proposed Changes should be submitted alongside the draft Plan to inform and assist the Examination process. This schedule of Proposed Changes can be considered by the Inspector through the Examination process as changes to the draft Plan under section 20(7C) Planning and Compulsory Purchase Act 2004 (as amended)
48. In addition to the Proposed Changes outlined above, other changes are proposed in **Appendix 2** that are generally in response to representations received and include the following:
- Amendments to plan text to address factual updates submitted through representations;
 - Amendments to site boundaries to reflect comments received through consultation; and
 - Amendments to policies and text to reflect representations from statutory consultees (e.g. Environment Agency in relation to providing greater clarity on how flood risk will be addressed).

Overview and Scrutiny Engagement

49. The draft Plan has not been subjected to the Council's Overview and Scrutiny function. It has been agreed that as the Environment Select Committee has not prioritised this item highly as a topic of interest, no Overview and Scrutiny engagement is to be undertaken at present.

Safeguarding Implications

50. Whilst there are no safeguarding implications as a direct result of this proposal, as anticipated by the Council's Business Plan, the delivery of new homes will likely lead to wider social benefits as a function of building strong and resilient communities.

Public Health Implications

51. In accordance with the provisions of Section 39(2) of the Planning and Compulsory Purchase Act 2004 (as amended), planning for sustainable development seeks to address the housing, infrastructure and employment needs of communities, thereby helping to foster social well-being, encourage healthier lifestyles and tackle inequalities. Well planned, accessible developments contribute to improving public health, for example through the provision of green infrastructure, as well as encouraging cycling and walking via sustainable transport initiatives.

Procurement Implications

52. The Examination of the draft Plan will entail the need to procure the services of a suitably experienced Programme Officer to help support the appointed Inspector. The role of the Programme Officer is to act as a conduit for information sharing between the Council, Third Party representatives and the Inspector. The appointment of a Programme Officer is mandatory. The financial implications include provision for this appointment.

Equalities Impact of the Proposal

53. The draft Plan aims to positively manage growth in accordance with the Wiltshire Core Strategy and thereby ensure sufficient homes are available to meet housing needs.
54. Statutory requirements¹⁰ governing the submission stage of plan preparation determine that the draft Plan be supported by an Equalities Impact Assessment. A copy of this Assessment is attached at **Appendix 6** for Members' consideration.
55. The Council has a duty under Section 149 of the Equalities Act to have due regard to the need to:
- eliminate discrimination;
 - advance equality of opportunity between persons who share a "*relevant protected characteristic*" and persons who do not share it;
 - foster good relations between persons who share a "*relevant protected characteristic*" and persons who do not share it.

Environmental and Climate Change Considerations

¹⁰ Section 149, Equality Act 2010; Section 20, Planning and Compulsory Purchase Act 2004; Regulation 22, Town and Country (Local Planning) (England) Regulations 2012

56. Spatial planning has implications for the natural, economic and social environment. A Sustainability Appraisal, incorporating Strategic Environmental Assessment, has been undertaken as an integral element of the plan making process and thereby seeks to ensure that the potentially negative environmental impacts associated with the development of the proposals on the face of the draft Plan are avoided, or appropriately mitigated. The updated Sustainability Appraisal Report (see paragraph 31 above) is published as a supporting document to this report and the Non-Technical Summary attached at **Appendix 7**. These incorporate an assessment of the implications for the Sustainability Appraisal of the schedule of Proposed Changes. A Habitats Regulations Assessment and Addendum have also been undertaken to support the draft Plan.
57. Managing climate change is one of the cross-cutting themes of the Wiltshire Core Strategy and therefore a principle that has been woven into the methodology for this draft Plan. The evidence relied upon to support this draft Plan has sought to identify the most sustainable options by addressing issues such as: flood risk from all sources; accessibility to services and facilities; bolstering green infrastructure; managing direct phosphate generation; and minimising, where practicable at the plan making stage, potential amenity issues relating to the generation of noise, dust and light pollution.
58. Once adopted, the draft Plan will become part of the development plan for Wiltshire. Therefore, specific policies of the Wiltshire Core Strategy that seek to protect and enhance the environment; as well as those that protect against the risks associated with climate change will be relevant in the consideration of planning applications relating to the development of the proposed site allocations.

Risks that may arise if the proposed decision and related work is not taken

59. If the proposed decision is not taken the Council would fail to meet the obligations it set itself through the Local Development Scheme. In addition, any delay in submitting the draft Plan could leave the Council open to speculative planning applications for housing schemes.
60. Progression of the draft Plan will therefore help reduce this risk by ensuring that the Council is able to boost housing supply across each of its Housing Market Areas.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

61. The draft Plan is a sound plan but nonetheless to manage any risk that the submitted draft Plan could be found to be unsound through the Examination process and hence recommended for withdrawal by the Inspector the Council can manage this risk by:
- Ensuring that it provides all the documents prescribed by statute (see Legal Implications);

- Submitting a schedule of Proposed Changes to inform and assist the Examination process in response to representations made to the draft Plan (see paragraph 14 above);
- Requesting that the Inspector recommend modifications to the submitted draft Plan that would effectively make it sound. This can be achieved through a direct request to the appointed Inspector in accordance with the provisions set out in Section 20 (7C) of the Planning and Compulsory Purchase Act 2004 (as amended); and
- Ensuring any detailed matters that need to be subject to refinement are finalised prior to adoption as part of an iterative process. The management of phosphates, which is considered within the Habitats Regulations Assessment (HRA), is one such example. An Addendum to the HRA has been prepared to reflect the current position and the Memorandum of Understanding under development between various parties, which will set out the approach to identifying effective and proportionate measures to remove or off-set the phosphate load from qualifying developments. There is a risk that it will not be possible to devise sufficient mitigation measures to off-set development. However, Natural England and Environment Agency consider this is possible. Constructive progress is being made, as set out in paragraph 34, and there is every reason to be confident that satisfactory mitigation can be achieved which will enable a sound plan to proceed to adoption.

62. There remains a reputational risk to the Council if it proceeds with the draft Plan. This would likely arise from local people who do not want to see development occurring close to where they live, or areas they value. Whilst this risk is real, the Council is nonetheless charged with making difficult, often controversial decisions in the interests of ensuring it maintains an up to date Local Plan and a planned approach to development.

Financial Implications

63. Provision will be made from the Economic Development and Planning 2018/19 budget for costs associated with the Submission and Examination of the draft Plan. This is forecast to be circa £130,000 and includes the cost of the Inspector and Programme Officer.

Legal Implications

64. In accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'), the Council has a statutory duty to prepare planning policies and maintain an up-to-date development plan. This is further reinforced through the National Planning Policy Framework. The draft Plan has therefore been prepared in compliance with primary legislation.

65. Secondary legislation relating to the preparation of development plan documents is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 ('the Regulations'). In preparing the Plan, the Council has complied with the statutory duty to co-operate and engaged with a list of prescribed bodies¹¹, local communities and other stakeholders throughout the plan making process in accordance with its Statement of Community Involvement.
66. With particular regard to the legal duty to co-operate, the draft Plan is essentially a product of the Core Strategy and hence the scope of the matters considered to be relevant to the prescribed bodies is more limited than would be the case if the Council were embarking on a new plan. That said, the Council has engaged constructively, actively and on an on-going basis with the prescribed bodies as relevant during the preparation of the draft Plan. A draft statement highlighting how the Council had fulfilled the duty to cooperate up to the publication of the draft Plan was made available to support the consultation documents at the Regulation 19 stage of the plan making process (see **Appendix 8**). This statement has been updated to reflect dialogue since the publication stage and thereby support the submission materials (see **Appendix 9**).
67. Reflecting on the entire process to date, it is considered that the Council has discharged its functions in respect of Regulation 18 (Preparation of a local plan) and Regulation 19 (Publication of a local plan). Representations relating to the draft Plan submitted at the Regulation 19 consultation stage have been duly recorded in accordance with Regulation 20.
68. According to Section 20(3) of the 2004 Act and Regulation 22 (1), the next stage of the process involves the Council submitting a prescribed list of documents to the Secretary of State, alongside the draft Plan. These documents are:
- the sustainability appraisal report;
 - a submission policies map (i.e. changes to the policies map);
 - a statement setting out how the draft Plan has been prepared¹²;
 - copies of the representations received through the Regulation 19 consultation; and
 - such supporting documents considered relevant to the preparation of the draft Plan (e.g. the Habitats Regulations Assessment)
69. The 'supporting documents' include those published as supporting documents to this report together with the appropriate Appendices.
70. The next stage of the process following the consultation on the draft Plan is submission to the Secretary of State. Once submitted to the Secretary of State the draft Plan will be Examined by an independent Inspector

¹¹ The Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 4; and Section 33A of the 2004 Act

¹² The Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 22(1) (c)

whose role is to consider compliance with section 20(5) of the 2004 Act. The Council has complied with requirements of section 19 of the 2004 Act (as amended), and the Town and Country Planning (Local Planning) (England) Regulations 2012 pursuant to section 20(5)(a) 2004 Act. Further in respect of section 20 (5)(c) the Council considers that it has complied with its duty to cooperate under section 33A 2004 Act.

71. In respect of section 20(5)(b) of the 2004 Act and soundness of the draft Plan, the National Planning Policy Framework (paragraph 182) also requires the Council submits a plan for examination which it considers is “sound”, namely that it is:
- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** - the plan should be the most appropriate strategy, when considered against all reasonable alternatives, based on proportionate evidence;
 - **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.
72. Although there are outstanding issues to resolve in respect of the Habitats Regulations Assessment. The parties who are relevant to the resolution of these matters are confident that all outstanding technical issues can be satisfactorily resolved during the Examination process. As such there is no impediment to submitting the draft Plan and all supporting documents. Therefore, having considered all matters carefully, the Council considers the draft Plan to be sound in accordance with Section 20(5) (b) of the 2004 Act
73. Once adopted, the draft Plan will form part of the statutory development plan for the area and be used as such for the purpose of determining relevant planning applications

Options Considered

74. The draft Plan has been through an iterative and inclusive process. Each stage of that process has followed legislative requirements. The proposals within the draft Plan have been rigorously tested through various appraisals, including the Sustainability Appraisal, and an extensive formal consultation process at the Regulation 19 Publication stage.

75. Progression of the draft Plan to the formal submission and Examination stage will ensure that the Council maintains the commitment it gave through the published Local Development Scheme. Moreover, progressing the draft Plan will help ensure the Council maintains a planned approach to housing development in areas that support the delivery of the Core Strategy.
76. In considering the comments submitted during the consultation period, the option of not proposing changes to the draft Plan was considered. Indeed, there is no requirement in the Regulations to propose such changes prior to submission. Such matters are ordinarily addressed through the Examination process with the appointed Inspector ultimately determining the scope and scale of any changes to the draft Plan before recommending such changes be made. However, a schedule of Proposed Changes has been produced to inform and assist the Examination process.

Conclusions

77. Having completed all statutory steps in the plan making process, it is considered that there are no fundamental issues of soundness that would preclude the Council from submitting the draft Plan. The appointed Inspector will review all the representations received through the Regulation 19 consultation and the evidence relied upon by the Council in preparing the draft Plan. The Examination will then focus on soundness matters that the Inspector considers need to be tested thoroughly through open hearing sessions before determining whether the draft Plan should be:
- Withdrawn (i.e. it would fail the tests of soundness and is incapable of addressing such matters); or
 - Adopted without modification; or
 - Adopted subject applying a schedule of main modifications.
78. In the spirit of the letter dated 21 July 2015 from the former Department of Communities and Local Government to the Chief Executive at the Planning Inspectorate (attached at **Appendix 10**), which is now common practice, it will be within the Inspector's remit to work pragmatically and positively with the Council to deliver the draft Plan. This will involve an iterative process with the Inspector. At this stage, it is considered that the draft Plan remains a sound document that is based on a credible evidence base and benefits from an inclusive process of consultation and engagement at the Regulation 18 and Regulation 19 stages.
79. The Council has engaged constructively, actively and on an ongoing basis with the bodies prescribed in the 2004 Act (as amended) and Regulations during the process of preparing the draft Plan. Indeed, much of this engagement built upon the work undertaken through the preparation of the Core Strategy. As such, the challenges faced by the Council in terms of delivering a steady and reliable supply of homes across the County have

been well rehearsed through evidence gathering over a considerable period.

80. Whilst the comments received through the Regulation 19 consultation challenge the soundness of the draft Plan, the matters raised are considered to be capable of resolution through the Examination process. A schedule of Proposed Changes has been prepared to assist the appointed Inspector.
81. Cabinet is asked to endorse the draft Plan and schedule of Proposed Changes and recommend to Council that these, together with the wider prescribed submission documents¹³ be submitted to the Secretary of State as set out in paragraph 1 above.
82. In conclusion, it is considered that the draft Plan remains a sound plan and therefore appropriate to submit to the Secretary of State to commence the Examination process. Subject to Council approval submission of the draft Plan together with the schedule of Proposed Changes in June 2018 will accord with the timescale within the approved Local Development Scheme.

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Date of report: 4 May 2018

Appendices

Appendix 1: Wiltshire Housing Site Allocations Plan - Pre-submission Draft Plan (June 2017)

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

Appendix 3: Note on Elm Grove Field and implications for asset transfer

Appendix 4: Addendum to the 'Assessment under the Habitat Regulations, June 2017' (May 2018)

¹³ As defined by Regulation 22(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012

Appendix 5: Note on Heritage
Appendix 6: Equalities Impact Assessment
Appendix 7: Non-Technical Summary, Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report (Updated May 2018)
Appendix 8: Duty to Co-operate Statement, June 2017
Appendix 9: Addendum to 'Duty to Cooperate Statement June 2017' (May 2018)
Appendix 10: Letter from Secretary of State to Chief Executive of Planning Inspectorate (July 2015)

Supporting Documents

The following documents have been published in support of this report:

Regulation 22 (1) (c) Report (May 2018) - Consultation Statement
Regulation 22 - Appendices 1 (May 2018)
Regulation 22 - Appendices 2 (May 2018)
Regulation 22 - Appendices 3 (May 2018)
Sustainability Appraisal Report, Atkins, Updated May 2018
Assessment under the Habitat Regulations, June 2017
Landscape Assessment - Part 3 (May 2018)
Heritage Impact Assessment, LUC, March 2018
Draft Trowbridge Transport Strategy Refresh, Atkins, May 2018
Draft Salisbury Transport Strategy Refresh, Atkins, May 2018
Topic Paper 1 - Settlement Boundary Review Methodology (May 2018)
Topic Paper 2 - Site Selection Methodology Minor Factual Update (May 2018)
Topic Paper 3 - Housing Land Supply (June 2017)
Addendum to 'Topic Paper 3 - Housing Land Supply, June 2017' (May 2018)
Addendum to 'Topic Paper 4 - Developing Plan Proposals, June 2017' (May 2018)
Assessment of Viability, BNP Paribas, June 2017

Community Area Topic Papers (Updated May 2018)

- Amesbury Community Area Topic Paper
- Bradford on Avon Community Area Topic Paper
- Calne Community Area Topic Paper
- Chippenham Community Area Topic Paper
- Corsham Community Area Topic Paper
- Devizes Community Area Topic Paper
- Malmesbury Community Area Topic Paper
- Marlborough Community Area Topic Paper
- Melksham Community Area Topic Paper
- Mere Community Areas Topic Paper
- Pewsey Community Area Topic Paper
- Royal Wootton Bassett Community Area Topic Paper
- Salisbury Community Area Topic Paper
- Southern Wiltshire Community Areas Topic Paper
- Tidworth Community Area Topic Paper
- Tisbury Community Area Topic Paper
- Trowbridge Community Area Topic Paper
- Warminster Community Area Topic Paper
- Westbury Community Area Topic Paper
- Wilton Community Area Topic Paper

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Wiltshire Housing Site Allocations Plan

Submission draft plan

May 2018

Wiltshire Council

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1. Introduction

The Purpose of the Plan

- 1.1** The purpose of the Wiltshire Housing Site Allocations Plan ('the Plan') is to:
- Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and
 - Allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026.

Settlement Boundary Review

- 1.2** The Council did not review the extent of the boundaries to inform the Wiltshire Core Strategy (WCS) and relied upon the former district local plans. They would instead be reviewed as a part of preparing the Plan.
- 1.3** Consequently, the Council has undertaken a comprehensive review of the boundaries to ensure they are up-to-date and adequately reflect changes which have happened since they were first established. The Plan amends settlement boundaries where necessary. It is also the prerogative of local communities to review them through the preparation of neighbourhood plans.

Housing Site Allocations

- 1.4** The WCS refers to the role of the Plan, in combination with the Chippenham Site Allocations Plan, to help ensure a sufficient choice and supply of suitable sites throughout the plan period in accordance with national policy and to compliment neighbourhood planning.

Plan Area

- 1.5** The Plan area is identified in Figure 1.1. It essentially corresponds with that of the adopted Core Strategy and hence covers Wiltshire, excluding the area of the Chippenham Site Allocations Plan (CSAP)⁽¹⁾.

1 The CSAP covers Chippenham Town and presents proposals for development in line with Core Policy 10 of the Wiltshire Core Strategy

Figure 1.1 The Plan Area



How the Plan has been prepared

- 1.6** Housing allocations have been made in general conformity with the settlement strategy outlined in Core Policy 1 as well as the relevant community area strategies contained within Chapter 5 of the WCS. Core Policy 2 supports the identification of sites through a subsequent Site Allocations Plan - now named the 'Wiltshire Housing Site Allocations Plan'.

- 1.7** The preparation of the Plan has also been informed by relevant plans and on-going evidence gathering to support decisions on the choice of sites and changes to settlement boundaries. The result of this work and how decisions have been reached is presented in a series of Community Area Topic Papers covering each part of the Plan area.
- 1.8** Additional information has been collated into five other topic papers and, together with Community Area Topic Papers these are all available on the Council's website. The additional papers are:
- Topic Paper 1 - Settlement Boundary Review Methodology
 - Topic Paper 2 - Site Selection Process Methodology
 - Topic Paper 3 - Housing Land Supply
 - Topic Paper 4 - Developing Plan Proposals
 - Topic Paper 5 - Assessment of Viability
- 1.9** A number of documents result from aspects of plan preparation required by legislation and they too play an important part. They can also be found on the website and comprise:
- Sustainability Appraisal
 - Habitat Regulations Assessment
 - Equality and Diversity Impact Assessment
 - A record of the steps taken under the Duty to Co-operate
 - Consultation Statement

Duty to Co-operate

- 1.10** The Plan is prepared under a legal 'duty to cooperate' requirement through the Localism Act 2011 which requires local authorities to work with neighbouring authorities and other prescribed bodies when preparing a development plan document. It places a legal duty on local planning authorities in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic matters. When preparing plans local authorities should also have regard to the Local Enterprise Partnership and other bodies prescribed in law.
- 1.11** The Council engaged with neighbouring authorities and statutory consultees throughout the preparation of the WCS, which sets the framework for this Plan. They supported the spatial strategy and quantum of development through the WCS preparation process. The spatial strategy and quantum of development can be considered to involve strategic issues where the duty to cooperate has already been fulfilled through the Core Strategy process.
- 1.12** Examples of strategic issues on which there has been continued co-operation in the preparation of this plan are:
- Flood and surface water drainage considerations for individual sites and the impact of cumulative development discussed with the Environment Agency.
 - Any potential considerations to mitigate impact on the Strategic Road Network (SRN) with the Highways Agency, particularly for potential site allocation in Salisbury.
 - Site specific landscape considerations discussed with Natural England.
 - Biodiversity considerations discussed with Natural England.
 - Site specific heritage considerations discussed with Historic England
 - Any impact on the New Forest National Park by way of potential increased recreational use discussed with the New Forest National Park Authority.
 - Ensuring that future development helps address and manage phosphate levels in the River Avon, its tributaries and surrounding catchment area. The management of

phosphates in the River Avon catchment water system is being discussed with the Environment Agency and Natural England on an ongoing basis. A Nutrient Management Plan has been published and is being monitored⁽²⁾.

- 1.13** How the outcomes from the Duty to Co-operate have informed the preparation of the Plan is set out in a separate report: <http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan>.

Sustainability Appraisal

- 1.14** The Council appointed consultant Atkins to oversee the Sustainability Appraisal (SA) of the Plan. SA is iterative and integrated into the plan-making process, influencing the selection of site options and policies through the assessment of likely significant effects. A draft SA Report has been published alongside the Plan: <http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan>.
- 1.15** Comments are invited on this version of the SA report during the consultation period in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (see below).

Policies Map

- 1.16** On adoption, the Wiltshire Policies Map will be amended to include the proposals set out in Chapters 5 (Housing site allocations) and 6 (Settlement boundary review) of this Plan. These proposals are set out in the Community Area Topic Papers which have been published as evidence to support this Plan.

How to comment on the Plan

- 1.17** This consultation is an opportunity to submit your comments on the draft Wiltshire Housing Allocations Plan.
- 1.18** To support the consultation, the Council has prepared a simple guidance document setting out how to make comments in relation to the key question of 'soundness'. The document together with a representation form can be found at: <http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan>.
- 1.19** The form asks whether you consider the Plan to be 'sound' on four key points. These key points are taken from the National Planning Policy Framework (NPPF) and should be considered in responding to the consultation.
- 1.20** Paragraph 182 of the NPPF states:

"The Local Plan, [in this case, the 'pre-submission' draft Wiltshire Housing Site Allocations Plan'] will be examined by an independent Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" - namely that it is:

- **Positively prepared** - the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

2 'Nutrient Management Plan - Hampshire Avon' May 2015
<https://www.gov.uk/government/publications/nutrient-management-plan-hampshire-avon>

- **Justified** - the plan should be an appropriate strategy, when compared against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

1.21 Comments are invited on the draft Wiltshire Housing Site Allocations Plan, the draft Sustainability Appraisal and supporting evidence, during the consultation period which starts **9am, Friday 14th July 2017 and ends 5pm, Friday 22 September 2017.**

1.22 Comments can be submitted:

- **Online** via the Council's dedicated consultation portal: <http://consult.wiltshire.gov.uk/portal>. Wherever possible we actively encourage all submissions to be presented through the portal as this speeds up processing time and makes for a more efficient consultation.
- **By email** using the representation form available at: <http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan> and returned to spatialplanningpolicy@wiltshire.gov.uk, or
- **By post** in writing (please use the representation form) and sent to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN

1.23 Following the consultation, the Council will register and consider the comments received before submitting the Plan (and all prescribed supporting documents) for independent examination. All comments received during the consultation period will be passed on to the appointed Inspector.

1.24 Any representations may be accompanied by a request to be notified at a specified address of any of the following:

- The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination;
- That the Inspector's Report (including any recommendations) into the examination of the Wiltshire Housing Site Allocations Plan has been published; and
- That the Wiltshire Housing Site Allocations Plan has been adopted.

1.25 It is therefore important that representors make their interests in the Plan clear on the representation forms. Failure to do so might affect the rights of individuals to be heard at any subsequent hearing sessions.

2. Context

National

- 2.1** The National Planning Policy Framework (NPPF) sets out the government's planning policies for England. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. One of its core principles is that development should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. The Plan is being prepared in accordance with that principle.
- 2.2** At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through plan-making and decision-taking.
- 2.3** It is an objective of the NPPF to deliver a wide choice of high quality homes and to boost significantly the supply of housing. The Plan identifies additional sites with these objectives in mind. They are developable over the plan period and they will supplement the existing supply. Some settlements have more environmental constraints than others and both new and existing allocations for housing development have differing degrees of complexity. This means that the Plan must involve a degree of flexibility and pragmatism to ensure a steady overall supply of enough land for housing development.

The Wiltshire Core Strategy

- 2.4** The Wiltshire Core Strategy (WCS) covers the whole of Wiltshire and sets out the Council's spatial vision, key objectives and overall principles for development in the County over the plan period 2006 to 2026. The WCS has been produced to be consistent with national policy and the Wiltshire Community Plan.⁽³⁾
- 2.5** The WCS identifies six key challenges for Wiltshire⁽⁴⁾:
- Economic growth to reduce levels of out-commuting from many of Wiltshire's settlements
 - Climate change opportunities to reduce greenhouse gas emissions and mitigate the consequences of a changing climate
 - Providing new homes to complement economic growth and a growing population
 - Planning for more resilient communities
 - Safeguarding the environmental quality of the County whilst accommodating new growth, and
 - Infrastructure investment to meet the needs of the growing population and economy.
- 2.6** The WCS presents a settlement strategy for managing growth over the period up to 2026 (Core Policy 1). The strategy establishes tiers of settlements based on an understanding of their role and function; and how they relate to their immediate communities and wider hinterland.
- 2.7** Core Policy 1 of the Core Strategy identifies five types of settlements, namely:
- Principal Settlements
 - Market Towns
 - Local Service Centres

3 <http://www.wiltshire.gov.uk/council-democracy-wfp-community-plan>

4 Paragraphs 2.6-2.19 of the WCS

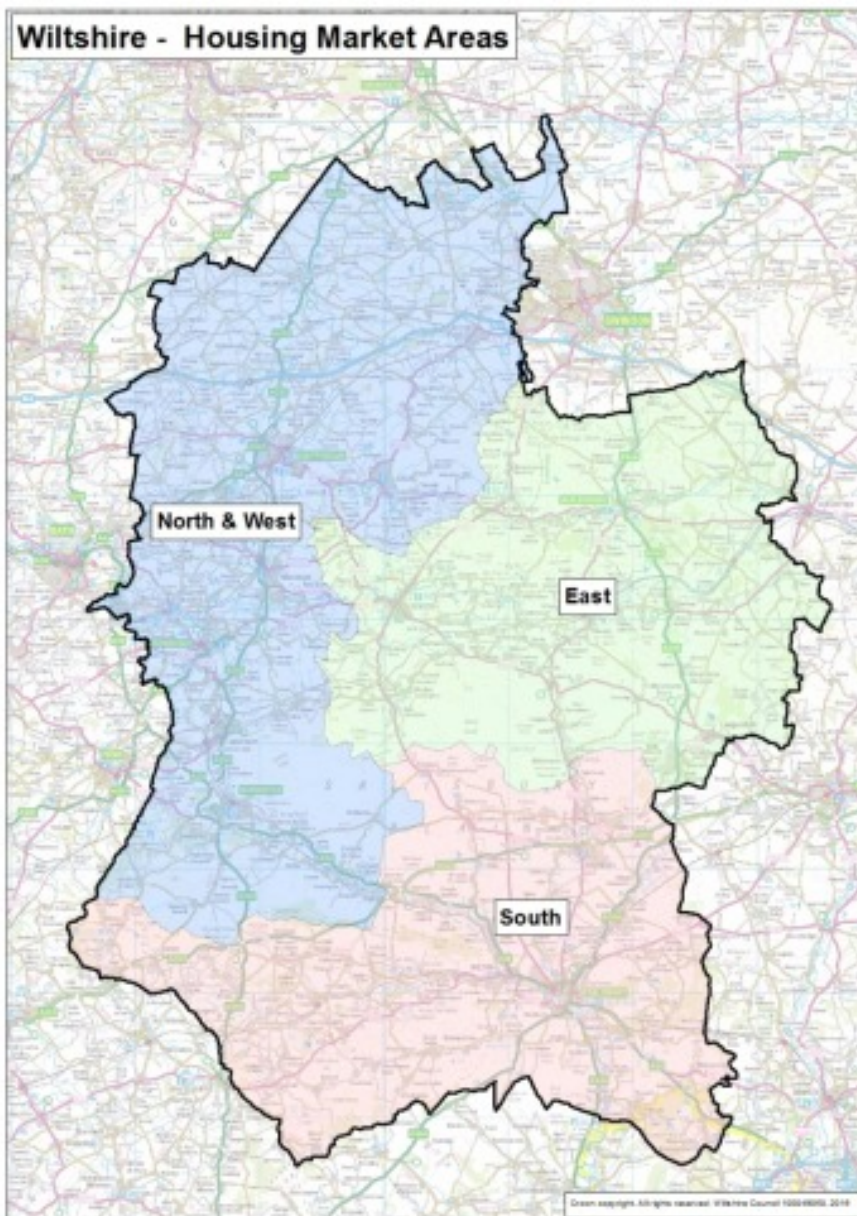
- Large Villages
- Small Villages

- 2.8** Settlement boundaries have been used in development plans for the County for a number of years. The WCS retains them. Except small villages each category of settlement has a “settlement boundary”. In simple terms, they are the dividing line, or boundary between areas of built/ urban development (the settlement) and non-urban or rural development - the countryside. In general, development within the settlement boundary is, in principle, acceptable, whereas development outside the settlement boundary is, with limited exceptions, not acceptable. The WCS uses settlement boundaries as a policy tool for managing how development should take place. Settlement boundaries are identified on the Policies Maps accompanying the WCS⁽⁵⁾.
- 2.9** Other than in circumstances as permitted by other policies listed in paragraph 4.25 of the WCS, development will not be permitted outside the defined settlement boundaries.
- 2.10** The WCS, in paragraph 4.13, sets out the intention for the retained settlement boundaries to be reviewed through the Housing Site Allocations Plan and the Chippenham Site Allocations Plan. Settlement boundaries can also be reviewed by the community through neighbourhood plans. The previous boundaries did not always reflect the built extent of settlements because they were determined some years ago. As a legacy of work done by the former District Councils, different methodologies were used to define the boundaries.
- 2.11** An objective of the Plan is therefore to review and update existing settlement boundaries to ensure they are up-to-date and accurately reflect circumstances on the ground, derived on a consistent county-wide basis. In some circumstances, a review of boundaries has been carried out by Neighbourhood Plans and will be in general conformity with the WCS.
- 2.12** Core Policy 2 of the WCS proposes that the County should accommodate at least 42,000 additional dwellings over the period 2006 to 2026. The WCS disaggregates this scale of housing to three separate housing market areas (HMAs - East, North and West and South) as shown in Figure 2.1 below⁽⁶⁾

5 Amendments to settlement boundaries made by individual Neighbourhood Plans will also be shown on the relevant inset of the Development Plan Policies Maps

6 A separate allowance of 900 dwellings is also made for West of Swindon. See paragraph 4.34 of the WCS.

Figure 2.1 Wiltshire Housing Market Areas



2.13 Core Policy 2 of the WCS proposes a minimum housing requirement for each HMA as follows:

Table 2.1 Housing Market Area - Minimum requirements

Housing Market Area (HMA)	Minimum housing requirement (dwellings)
East Wiltshire	5,940
North and West Wiltshire	24,740
South Wiltshire	10,420

2.14 The NPPF requires that each Local Planning Authority demonstrate that there is five years supply of deliverable land for housing development for each of the HMAs based on the implied delivery rates of the WCS requirement. Fluctuations can occur in the delivery of housing but a central objective of the Plan, ensuring surety of supply, is to sustain a ‘five year housing land supply’ over the remainder of the plan period for each of these HMAs.

2.15 To guide how each HMA requirement should be achieved, the table below sets out the relationship between each tier of the settlement strategy and the expected level of development under Core Policy 1.

Table 2.2 Settlement Hierarchy - Levels of development

Settlement	Level of development
Principal Settlement	The primary focus for development and will provide significant levels of jobs and homes
Market Town	Have the potential for significant development that will increase the number of jobs and homes to help sustain/ enhance services and facilities and promote self-containment and sustainable communities
Local Service Centre	Modest levels of development to safeguard their role and deliver affordable housing
Large Village	Development limited to that needed to help meet the housing needs of settlements and improve housing opportunities, services and facilities
Small Village	Some modest development may be appropriate to respond to local needs and contribute to the vitality of rural communities, but limited to infill.

2.16 The WCS also disaggregates indicative levels of housing to each Community Area and includes indicative requirements for levels of housing for the Principal Settlements, Market Towns and in the South Wiltshire HMA, the Local Service Centres; and their surrounding community areas. This distribution of development directs the majority of development to these main settlements and promotes a sustainable pattern of development across the county. An objective of this Plan is to allocate land to support this distribution. The Plan allocations therefore focus on those ‘areas’ where land supply falls short of these indicative levels.

2.17 The indicative housing requirements as set out in the Table 1 and the Area Strategy Policies of the WCS are as follows:

Table 2.3 Community Area Indicative Requirements

Area	Indicative requirement 2006-2026
Devizes	2,010
Devizes CA remainder	490

Area	Indicative requirement 2006-2026
Devizes CA Total	2,500
Marlborough	680
Marlborough CA remainder	240
Marlborough CA Total	920
Pewsey CA Total	600
Tidworth and Ludgershall	1,750
Tidworth CA remainder	170
Tidworth CA Total	1,920
EAST WILTSHIRE HMA	5,940
Bradford on Avon	595
Bradford on Avon CA remainder	185
Bradford on Avon CA Total	780
Calne	1,440
Calne CA remainder	165
Calne CA Total	1,605
Chippenham	4,510
Chippenham CA remainder	580
Chippenham CA Total	5,090
Corsham	1,220
Corsham CA remainder	175
Corsham CA Total	1,395
Malmesbury	885
Malmesbury CA remainder	510
Malmesbury CA Total	1,395
Melksham and Bowerhill	2,240
Melksham CA remainder	130
Melksham CA Total	2,370
Royal Wootton Bassett	1,070

Area	Indicative requirement 2006-2026
Royal Wootton Bassett and Cricklade CA remainder ⁽⁷⁾	385
Royal Wootton Bassett and Cricklade CA Total ⁽⁷⁾	1,455
Trowbridge	6,810
Trowbridge CA remainder	165
Trowbridge CA Total	6,975
Warminster	1,920
Warminster CA remainder	140
Warminster CA Total	2,060
Westbury	1,500
Westbury CA remainder	115
Westbury CA Total	1,615
NORTH & WEST WILTSHIRE HMA	24,740
Amesbury, Bulford and Durrington	2,440
Amesbury CA remainder	345
Amesbury CA Total	2,785
Mere	235
Mere CA remainder	50
Mere CA Total	285
Salisbury	6,060
Wilton	
Wilton CA remainder	255
Salisbury and Wilton CAs Total	6,315
Downton	190
Southern Wiltshire CA remainder	425
Southern Wiltshire CA Total	615
Tisbury	200
Tisbury CA remainder	220

7 Totals for Royal Wootton Bassett & Cricklade CA remainder and Royal Wootton Bassett & Cricklade CA exclude any development at the West of Swindon.

Area	Indicative requirement 2006-2026
Tisbury CA Total	420
SOUTH WILTSHIRE HMA	10,420

2.18 There is no requirement for each individual Community Area or settlement to have five years supply of land for housing. Furthermore, paragraph 4.30 of the WCS makes clear that:

“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.”

2.19 There are a number of sources for new homes to meet the requirements of Core Policy 2. They include:

- strategic allocations made within the WCS
- retained Local Plan allocations
- existing commitments
- regeneration projects, for example, those in Chippenham, Trowbridge and Salisbury
- Neighbourhood Plans
- windfall

2.20 The allocations shown in the Plan will supplement these existing sources to ensure a surety of supply over the plan period.

Relationship with Neighbourhood Planning

2.21 There are at the moment over sixty Neighbourhood Plans either being prepared or completed in Wiltshire and many more plans are likely over the years ahead. Many of these involve identifying land to meet the need for new homes. Their role in meeting housing requirements will become more significant alongside the Plan.

2.22 It is a priority of both Government and the Council that planning controls pass to local communities so they can develop their own local vision of sustainable development. Parish and Town Councils have been consulted on the review of settlement boundaries. The work being done on Neighbourhood Plans influences the selection of sites⁽⁸⁾ and where Neighbourhood Plans have been ‘made’ or are well advanced the Plan leaves decisions on the scale and locations for growth in settlements to the communities concerned.

2.23 In other locations, there may not yet be an appetite to prepare a Neighbourhood Plan or plans are at early stages of development. In these cases the Plan has considered how those settlements can accommodate additional housing and has allocated sites. In these cases, the priority to ensure a surety of housing land supply has taken precedence.

8 See stage 4a of the Housing Delivery Strategy below.

3. Plan objectives

- 3.1 Three objectives carry out the two purposes of the Plan to review settlement boundaries and allocate sites for housing development.

Settlement Boundary Review

- 3.2 The first objective for the Plan is to review settlement boundaries:

Objective 1: To ensure there is a clear definition to the extent of the built up areas at Principal Settlements, Market Towns, Local Service Centres and Large Villages

- 3.3 The Plan applies one consistent methodology for the County to replace the different ways used by the previous District Councils. The Council has developed this methodology in consultation with Parish and Town Councils. The process is explained in detail in Topic Paper 1: Settlement Boundary Review Methodology.

- 3.4 The result of the review and proposed changes to settlement boundaries is discussed in Chapter 6 and shown in the appendix to the Plan as well as in the Community Area Topic Papers.

Housing Site Allocations

- 3.5 The Plan allocates sites for housing development to ensure enough land is allocated to deliver the minimum requirements of each HMA. In so doing, the Plan has been prepared to achieve two further objectives:

Objective 2: To help demonstrate a rolling five year supply of deliverable land for housing development - a duty on each Local Planning Authority required by the NPPF.

- 3.6 The Plan must identify a number of greenfield sites involving the loss of countryside in order to achieve this objective. Land within settlements, in particular previously developed land, is acceptable for housing redevelopment in principle. A realistic allowance is included for this source of new housing when calculating the scale of land supply⁽⁹⁾. But within a predominantly rural area there is a limited amount of previously developed land. Not only are such opportunities limited, they can also be difficult to rely on as a large proportion of overall supply.

Objective 3: To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy. The spatial strategy for Wiltshire contained in the Core Strategy promotes the sustainable development of the County.

- 3.7 The spatial strategy describes a hierarchy of settlements within the County. Each tier recognises the particular role of those settlements and plans a level of new housing development that is appropriate. Chippenham, Salisbury and Trowbridge, are Principal Settlements supported by a number of Market Towns. Development at Large and Small Villages should accommodate local needs. Local Service Centres have also been identified that have a more pronounced role than villages. They possess a level of facilities and services that provide the best opportunities outside the Market Towns for sustainable development.

9 See Topic Paper 3 Housing for an explanation of how a windfall allowance has been estimated for each HMA. The approach accords with guidance contained in paragraph 48 of the NPPF.

- 3.8** The Site Selection Process Methodology contained in Topic Paper 2, explains in detail the methodology for identifying site allocations to meet these two objectives. The selection process and its results are summarised in the following 'Housing Delivery Strategy' section. Housing Allocations are explained and set out in Chapter 5 of the Plan.

4. Housing delivery strategy

How many homes are needed and where?

- 4.1** The WCS divides housing provision between the three HMAs. The vast proportion of housing needed over the plan period has already been built or is already committed.

Table 4.1 Housing Market Areas: Minimum to be allocated

Housing Market Area	Minimum Housing Requirement	Completions 2006-2017	Developable commitments 2017-2026	Minimum to be allocated
East Wiltshire HMA	5,940	3,497	2,273	170
North and West Wiltshire HMA	24,740	12,603	11,566	571
South Wiltshire HMA	10,420	5,067	4,759	594

- 4.2** The figures above show a minimum to be allocated, but a surplus is necessary to maintain five years supply of housing land in each HMA and to surpass the buffer in excess of five years required by the NPPF.

- 4.3** In order to deliver the spatial strategy, the priority for housing land allocations has been to focus on those higher tier settlements that have not yet met or contributed towards indicative levels of provision (Principal Settlements, Market Towns and Local Service Centres). This supports the sustainable development of the County sought by Objective 2 of the Plan. These settlements where allocations are justified are:

Table 4.2 Higher Tier Settlements where allocations were made

Housing Market Area	Principal Settlement, Market Towns and Local Service Centres
East Wiltshire HMA	Tidworth and Ludgershall Market Lavington
North and West Wiltshire HMA	Trowbridge Warminster
South Wiltshire HMA	Salisbury Amesbury, Bulford and Durrington

- 4.4** The WCS proposes much more modest levels of housing provision at Large Villages as reflected in the indicative scales of housing for each community area. Some new development, to meet local needs, may be appropriate at some of the designated Large Villages within these rural areas either through sites allocated in the Plan or by Neighbourhood Plans produced by the local community.

4.5 No allocations are made at Large Villages in the East Wiltshire HMA because there is no strategic priority to do so due to the level of completions and supply committed within the HMA. Housing to meet local needs can be identified where necessary through neighbourhood planning. Neighbourhood planning will also supplement supply in the other two HMAs. No suitable sites were available at Large Villages in the South Wiltshire HMA and therefore the Plan makes no allocations in that area either. The Plan makes allocations at Large Villages only in the North and West Wiltshire HMA. These involve the following Community Areas:

Table 4.3 Community Areas where allocations were made at Large Villages

Housing Market Area	Large Villages
North and West Wiltshire Housing Market Area	Chippenham Community Area Remainder Malmesbury Community Area Remainder Warminster Community Area Remainder Westbury Community Area Remainder

How were sites selected?

4.6 A separate topic paper explains the Council's approach to site selection⁽¹⁰⁾.

Stage 1: Areas of Search

4.7 The selection process identifies land for house building that supports the distribution and indicative levels of housing set out in the WCS. Site selection prioritises allocating housing sites at those main settlements and areas where land supply needs to be supplemented in order to meet those levels. The outcome of stage one therefore defined 'areas of search' where sites do need to be selected (see above).

Stage 2: Strategic Assessment

2A: Exclusionary criteria

4.8 All councils are required to maintain a register of land that has been put forward for development. This is referred to as the Strategic Housing Land Availability Assessment (SHLAA)⁽¹¹⁾. Within areas of search the SHLAA provides a pool of land opportunities for possible housing development.

4.9 Other land, not included in the SHLAA, may possibly be capable of development but because neither a developer nor landowner has promoted the site for development, the site cannot be said to be available or developable within the plan period. It cannot be counted on to supplement housing land supply and therefore, for the Plan to be effective, land other than SHLAA sites has not been considered for inclusion. SHLAA sites were therefore the basic building blocks of the Plan, but they simply amount to land put forward for development.

4.10 This does not mean any particular site is developable or suitable for development; either in part or whole. There may be a number of barriers to development ruling out their suitability. SHLAA sites may include land with areas at risk of flooding or ecological or historic sites

10 Topic Paper 2: Site Selection Process Methodology, Wiltshire Council (June 2017)

11 Strategic Housing and Economic Land Availability Assessment, Wiltshire Council, (at 1 January 2017)

that are important to protect. A strategic assessment tested each SHLAA site against a number of such constraints and criteria including whether a site was already committed for development or within the urban area.

- 4.11 Some sites were also detached from a settlement with no prospect of forming a part of its existing built up area. Where housing development involves encroachment into the countryside it should take place in a way that expands an existing built up area in order to prevent unnecessary loss of open countryside and so that new homes are directly-related to the community.
- 4.12 SHLAA sites were rejected, or a reduction in their capacity to accommodate housing noted because one or more of these considerations applied to part or the whole leaving a smaller set of potential sites within areas of search.

2B: Large villages

- 4.13 The WCS sets down requirements for scales of new housing at each of the County's main settlements. It provides an approximate scale of anticipated housing development for the surrounding rural hinterland of each community area. These areas contain several rural settlements (Large and Small Villages and in some instances Local Service Centres) that do not have individually set levels of development. The spatial strategy requires new housing development at these Large and Small Villages to be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Some rural settlements are designated as Local Service Centres where levels of facilities and local employment suggest greater potential for growth and self-containment.
- 4.14 Opportunities at some Large Villages have not been explored because local housing needs for the plan period have already been accommodated; either through development that has already taken place or that is planned. Further development brought about by new plan allocations would be in excess of meeting local needs and result in conflict with WCS Core Policy 1. SHLAA sites at these Large Villages were not therefore considered reasonable alternatives.
- 4.15 The future development of some Large Villages has already been thoroughly considered by Neighbourhood Plans. Neighbourhood planning addresses the housing needs of a settlement in accordance with Core Policy 1 of the WCS. It is unnecessary for the Plan to supplement local consideration and SHLAA sites at Large Villages where Neighbourhood Plan preparation is at an advanced stage are not considered reasonable alternatives.
- 4.16 Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.
- 4.17 Based on an assessment of these factors, a number of Large Villages were excluded from further consideration and potential sites at these Large Villages were therefore rejected.

Stage 3: Sustainability Appraisal

- 4.18 After a high level assessment, remaining potential sites have been assessed using Sustainability Appraisal (SA). This is a transparent and systematic way of carrying out a detailed assessment of the sustainability performance of all the remaining site options using a SA framework.

- 4.19** The SA framework contains 12 objectives that cover the likely environmental, social and economic effects of development. The performance of each site was assessed against each of the objectives using a consistent set of decision-aiding questions. The objectives and decision aiding questions resulted from consultation on a scoping report. The appraisal used common evidence and the process therefore ensured a transparent, consistent and equitable comparison of all reasonable alternatives.
- 4.20** Where potential sites were rejected, the reasons for doing so are clearly stated. Other sites were divided into 'more sustainable' and 'less sustainable' site options.

Stage 4: Selection of Preferred Sites and Developing Plan Proposals

4A: Selection of preferred sites

- 4.21** The focus for further work was the set of 'more sustainable' sites identified at stage 3. Further consultation with stakeholders helped to develop potential sites into site options with individual housing capacities and specific boundaries. Consultation also helped to identify requirements that should be highlighted for individual site options, to guide the form development should take, including the definition of realistic site boundaries. In exceptional circumstances, it was necessary to consider 'less sustainable' sites.

4B: Developing Plan Proposals

- 4.22** Previous stages assessed individual sites. Together the total amount of housing proposed in the Plan should aim to ensure overall supply at least meets HMA requirements. The form housing land supply takes should also provide for a demonstrable five year supply of land for each year in the plan period. Therefore shortcomings in terms of the total number of dwellings, the components of supply and its timing may require previous stages to be revisited, possibly in order to expand areas of search and the number of potential site options. Topic Paper 4: 'Developing Plan Proposals' considers these issues for each HMA in turn.
- 4.23** This stage also checked how all the draft allocations together fitted with the spatial strategy; in terms of the overall distribution of housing growth; the approach to rural areas; and the role of Principal Settlements and Market Towns. Where there is a shortfall at any Market Town or Principal Settlement then there is an assessment of possible impact in terms of the wider area and measures for the future are suggested to address those potential effects.
- 4.24** The rationale for the Plan is to supplement housing land supply. This is a strategic priority stemming from the WCS. The spatial strategy expects development at Large Villages to respond to local needs. At the same time it is Government and the Council's wish to give direct power to local communities to articulate their own visions for their area, to define and respond to their own local need. Therefore, in the absence of a strategic priority, where land supply can meet objectives of the Plan without allocating sites at villages then it should not. This stage has therefore specifically reviewed the purpose and the case for making allocations at Large Villages.

Stage 5 Viability Assessment

- 4.25** Viability assessment has verified that preferred sites and the scale of development identified in the Plan would not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It also shows that preferred sites are capable of providing policy compliant levels of affordable homes. The Assessment has been carried out by independent experts on this aspect and their report has been published separately (Topic Paper 5: Assessment of Viability).

Stage 6: Sustainability Appraisal of Plan Proposals and Habitats Regulation Assessment

4.26 Following completion of the viability assessment, a final stage of SA was undertaken on draft policies within the Plan and further refinements were necessary to improve mitigation measures to see that the Plan delivers the most sustainability benefits possible. This stage of the assessment considered the impact of the Plan as whole; its cumulative effects.

4.27 In terms of biodiversity, the impact of potential sites on European Designations is an important factor in the selection of preferred sites. The Plan as a whole however is also required through the Habitats Directive and the Conservation of Habitats and Species Regulations 2010 (as amended), to consider if it may have a likely significant effect on European Sites either alone or in combination with other plans or projects. The Appropriate Assessment concludes that the Plan will not have adverse effects on the integrity of any European Sites. The reasons for this conclusion have been published separately in the Habitats Regulations Assessment.

Summary of site allocations

4.28 Each Community Area Topic Paper considers whether it is appropriate to allocate sites for housing development, based on the remaining requirements for that Community Area, and justifies the selection of particular sites. In summary the Plan allocates the following sites in each HMA.

East Wiltshire Housing Market Area

Table 4.4 East Wiltshire Housing Market Area - Summary of allocations

Settlement	SHLAA reference	Site Name	Approximate dwellings
Market Lavington	1089	Southcliffe	15
	2055/ 530	Underhill Nursery	50
	3443	East of Lavington School	15
Ludgershall	553	Empress Way	270 ⁽¹²⁾

North and West Wiltshire Housing Market Area

Table 4.5 North and West Housing Market Area - Summary of allocations

Settlement	SHLAA reference	Site Name	Approximate dwellings
Hullavington	690	The Street	50
Yatton Keynell	482	East of Farrells Field	30
Crudwell	3233	Ridgeway Farm	50 ⁽¹³⁾
Trowbridge	613	Elm Grove Farm	200

12 This total includes 109 dwellings that already have planning permission

13 This total includes 10 dwellings that already have planning permission

	1021	Church Lane	45
	3260	Upper Studley	20
	298	Land off the A363 at White Horse Business Park	150
	3565	Southwick Court	180
	297/ 263	Elizabeth Way	205
Warminster	603	East of the Dene	100
	302/ 1032	Bore Hill Farm	70
	304	Boreham Road	30
Chapmanslade	316	Barthers Farm Nurseries	35
Bratton	321	Court Orchard / Cassways	40

South Wiltshire Housing Market Area

Table 4.6 South Housing Market Area - Summary of allocations

Settlement	SHLAA reference	Site Name	Approximate dwellings
Durrington	3154/ S98	Clover Lane	45 ⁽¹⁴⁾
	3179	Land off Larkhill Road	15
Salisbury	S1028	Land at Netherhampton Road	640
	S61	Land at Hilltop Way	10
	S1027	North of Netherhampton Road	100
	3272	Rowbarrow	100

4.29 The site allocations for each HMA meet two objectives of the Plan (Objectives 2 and 3):

- To help demonstrate a rolling five year supply of deliverable land for housing development.
- To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy.

Objective 2 Housing Land Supply

4.30 In addition to allocations in the WCS and the Plan, as well as sites with planning permission, the Council has made an allowance for windfall sites in the five year supply. With sites allocated in this plan, overall provision for new housing in each HMA is as follows:

14 This total includes approximately 15 dwellings that already have planning permission

Table 4.7 HMA housing land supply 2006-2026

Housing Market Area (HMA)	Minimum Housing Requirement	Completed (2006-2017)	Commitments (2017-2026)	Windfall Allowance (2017-2026)	Plan Allocations (2017-2026)	TOTAL	Surplus
East Wiltshire	5,940	3,497	2,273	811	241	6,822	882
North and West Wiltshire	24,740	12,603	11,566	2,086	1,195	27,450	2,710
South Wiltshire	10,420	5,067	4,759	736	795	11,357	937

4.31 The Plan helps to provide for the amount of housing required by the WCS. Plan preparation has also looked at the likely timings of construction of the various land sources using trajectories of dwelling completions (housing trajectories). The results are reported in Topic Paper 4: Developing Plan Proposals. This assesses how the Plan achieves a sufficient supply in each year over the plan period in order to meet the objective of ensuring a five year supply of deliverable land for each of the remaining years of the WCS plan period to 2026.

4.32 Housing trajectories are site by site estimates of start and finish dates and annual completions. Aggregating housing trajectories for each HMA shows how the Plan helps to deliver in excess of five years supply of land in each area for the remaining years of the plan period. The table below provides estimates of how many years supply there will be in each remaining year of the plan period. It shows that supply exceeds the five year requirement through to the end of the plan period for all years except one in the South Wiltshire HMA and well before then additional allocations will be included within the review of the WCS.

Table 4.8 HMA Five year land supply estimates 2017-2026

HMA	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East Wiltshire	9.18	9.11	9.75	12.20	22.44	20.18	14.01	9.81	7.45
North and West Wiltshire	7.15	7.54	7.64	7.54	7.85	7.92	7.48	6.54	5.30
South Wiltshire	6.09	6.30	6.43	6.65	6.88	7.13	6.70	5.87	4.75

4.33 To be sure of maintaining a surety of supply, the annual estimates should exceed the five year requirement and buffer anticipated by national planning policy. A surplus is important to allow for any possibility of under delivery in the future.

Objective 3 Spatial Strategy

- 4.34** The scale and distribution of site options at each settlement should also be consistent with that proposed by the spatial strategy in the WCS. A shortage of new housing and infrastructure for instance will limit provision for affordable homes, could depress economic growth and undermine the viability and vitality of town centres. On the other hand, widespread over provision, particularly toward smaller rural settlements, might undermine the spatial strategy. A symptom of this would be over burdened local infrastructure and greater environmental impacts from more travelling between settlements and more widespread loss of countryside.
- 4.35** It would not, however, be reasonable to expect the distribution and scale of land supply to adhere rigidly to the levels set in the WCS. It would be unrealistic to expect as much. The WCS explains that levels are indicative and that there needs to be some flexibility.
- 4.36** Levels of housing development in settlements and rural areas are indicative levels of growth. They are approximate and neither minimum or maximums; instead they are an indication of the general scale of growth appropriate for each area and settlement during the plan period.
- 4.37** The following sections describe the relationship between the distribution of housing development (including the site allocations) and the spatial strategy for each of the County's HMAs.

East Wiltshire Housing Market Area

- 4.38** The table below compares indicative with proposed levels of growth in each Community Area:

Table 4.9 East Wiltshire HMA - Distribution of housing development 2006-2026

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	%Variation
Urban areas					
Devizes	2,010	1,447	689	2,136	6.3%
Marlborough	680	357	306	663	-2.6%
Tidworth and Ludgershall	1,750	728	1,109	1,836	5.0%
TOTAL	4,440	2,532	2,103	4,635	4.4%
Rural areas					
Devizes CA remainder	490	286	182	468	-4.5%
Marlborough CA remainder	240	160	46	206	-14.1%
Pewsey CA	600	426	179	605	0.9%
Tidworth CA remainder	170	93	3	96	-43.5%
TOTAL	1,500	965	410	1,375	-8.3%

- 4.39** The overall pattern of growth is in general conformity with the WCS. It is consistent with the principles of the spatial strategy. Compared to indicative levels, development is focussed slightly more on the Market Towns (+4%) and less on the rural settlements (-8%).
- 4.40** Indicative levels of housing for Market Towns are not a ceiling and a variance would not seem to present new or significant issues for local infrastructure and environmental capacity.
- 4.41** Similarly, variations from the spatial strategy do not appear to give rise to significant issues. The rural area around Tidworth contains two designated Large Villages: Collingbourne Ducis and Netheravob. Collingbourne Ducis has experienced above average growth since 2006. This would seem sufficient to help maintain its role. Netheravon has several brownfield sites that are potentially suitable for redevelopment and these possibilities would be best explored through a neighbourhood planning process.
- 4.42** A number of rural communities within the HMA are developing a local vision for the sustainable development of their settlement using neighbourhood planning⁽¹⁵⁾. These will address local needs, including needs for new homes, and they will progress further allocations to include housing that will contribute to supply. Neighbourhood plans will be a main means to sustain the roles of Large Villages described in the spatial strategy.
- 4.43** The distribution of housing development accords with the underlying principles of the WCS to direct development to the most suitable, sustainable locations.

North and West Wiltshire Housing Market Area

- 4.44** The table below compares indicative with proposed levels of growth in each Community Area:

Table 4.10 North and West HMA - Distribution of housing development 2006-2026

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	%Variation
Urban areas					
Bradford on Avon	595	387	212	599	1%
Calne	1,440	961	807	1,768	23%
Chippenham	4,510	1,204	3,819	5,023	11%
Corsham	1,220	646	587	1,233	1%
Malmesbury	885	560	455	1,015	15%
Melksham and Bowerhill	2,240	1,370	1,221	2,591	16%
Royal Wootton Bassett	1,070	997	158	1,155	8%
Trowbridge	6,810	2,965	2,625	5,590	-18%
Warminster	1,920	603	1,055	1,658	-14%

15 Community Area Topic Papers summarise progress on neighbourhood planning

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	%Variation
Westbury	1,500	877	931	1,808	21%
TOTAL	22,190	10,570	11,871	22,441	1%
Rural areas					
Bradford on Avon CA remainder ¹	185	119	72	191	3%
Calne CA remainder	165	92	153	245	49%
Chippenham CA remainder	580	409	113	522	-10%
Corsham CA remainder	175	255	96	351	101%
Malmesbury CA remainder	510	336	144	480	-6%
Melksham CA remainder	130	101	38	139	7%
Royal Wootton Bassett and Cricklade CA remainder ²	385	315	150	465	21%
Trowbridge CA remainder	165	255	23	278	69%
Warminster CA remainder	140	90	53	143	2%
Westbury CA remainder	115	61	47	108	-6%
TOTAL	2,550	2,033	890	2,923	15%

- 4.45** There are marked differences in the anticipated growth of Calne and Westbury over the plan period compared to the two Principal Settlements of the HMA, Chippenham and Trowbridge.
- 4.46** Growth at Chippenham and Trowbridge has not matched expectations. Land has been in short supply or delayed in coming forward. As Principal Settlements within the HMA they are intended to be the primary focus for development, providing significant levels of jobs and homes.
- 4.47** In contrast, rates of development at most Market Towns have met expectations and at Bradford on Avon, Calne, Malmesbury, Melksham, Royal Wootton Bassett and Westbury anticipated levels of growth have been exceeded over the first half of the plan period. Land has been available and some additional sites granted consent by planning appeals. Over the same interval, scales of development within rural areas in many places have also exceeded those anticipated by the WCS.

- 4.48** Indicative levels of housing for Market Towns are not a ceiling and variations would not seem to present new or significant issues for local infrastructure and environmental capacity. Allocations made in the Plan are made to support the spatial strategy. It is not however practical for the Plan to completely re-dress imbalances in the distribution of development from what the spatial strategy envisaged. A review of the WCS is also the appropriate means to properly consider the performance and longer term prospects of settlements.
- 4.49** Chippenham however is now likely to exceed the minimum scale of growth anticipated in the WCS by higher rates of house building in the last half of the plan period compared to much lower rates over recent years. This will come about in large part as a result of significant allocations for housing development made in the Chippenham Site Allocations Plan.
- 4.50** Until very recently there has been a shortage of development opportunities in the town. It is difficult to substantiate a direct connection, but this shortage may also have contributed to the higher than anticipated rates of development experienced by Calne, neighbouring Chippenham. Higher rates of development than expected cause concern about the adequacy of local infrastructure to support population growth and about environmental impacts. No allocations are proposed in the Plan for Calne or Corsham.
- 4.51** Symptoms of similar circumstances appear to be apparent with regard to Trowbridge as at Chippenham, although there would not appear to be such a pronounced shortage of land at Trowbridge.
- 4.52** Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 dwellings. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220.
- 4.53** One main reason for a shortfall in land supply is the complexity and consequent delay developing Ashton Park, a south eastern extension to the town. 1,600 dwellings will be built on this site in the plan period and a further 1,000 post 2026; rather than first envisaged that the whole of the allocation would have been completed in the plan period. This can be seen to account for 1,000 of the 1,220 dwelling shortfall.
- 4.54** A second main reason for a shortfall has been the inability to identify enough land free from environmental constraints that could compensate for the consequences of delay to Ashton Park. Designated Green Belt provides long term protection from development and limits the scope for Trowbridge to expand. Ecological constraints result from the need to safeguard habitats for protected bats. Other options are limited for different reasons.
- 4.55** In addition, to meet Plan objectives, land identified should be capable of development within the plan period. Unlike Salisbury, there are no reserve locations or areas of search. At this stage, substituting one complex site by another would not provide a remedy to a relatively short-term issue.
- 4.56** Looking over the plan period there has not been as dramatic a fall off in dwelling completions at Trowbridge as took place at Chippenham. The Plan allocations provide choice and flexibility as well as add to supply. The shortfall compared to an indicative level is not so severe as to jeopardise the position of Trowbridge as a Principal Settlement or undermine objectives of the spatial strategy. The WCS makes clear that indicative requirements for community areas provide context and are not prescriptive. A lower provision over the shorter term represents the flexibility associated with the indicative nature of the requirements of the WCS.

- 4.57** Both Westbury and villages around Trowbridge have experienced higher than anticipated rates of growth. The WCS has the objective of consolidating growth at Westbury and this plan makes no additional allocations for housing development.
- 4.58** Constraints to Trowbridge's longer term growth will be addressed as part of the review of the Core Strategy that will look from 2016 beyond 2026 to 2036. This might include a review of how Green Belt boundaries around the town may affect the town's longer term prospects.
- 4.59** Differences from the pattern of development envisaged by the WCS have arisen over the first half of the plan period. Plan allocations go some way to reversing this, but only so far. Specifically, growth at Trowbridge is more constrained and more difficult to realise than had been envisaged, although not so much as to fundamentally undermine the spatial strategy. Housing provision exemplifies the flexibility made necessary by the indicative nature of community area requirements of the WCS.
- 4.60** The scale of development at Warminster is not envisaged to meet indicative strategic requirements. Three proposals of the Plan improve choice in the Town. Constraints include flood risks and managing phosphate levels that can affect the River Avon Special Area of Conservation. The West Warminster Urban Extension, a strategic site in the WCS, provides by far the largest part of new housing to serve the town and this area will continue to do so for several more years after 2026. It provides a longer term surety of supply that supports the role and function of the town.
- 4.61** Allocations of the Plan at Large Villages in the HMA are made only at those settlements where indicative levels will not be met and where local needs are not being addressed through neighbourhood planning. As well as being necessary to help ensure a surety of supply, these allocations will help to support the role of those Large Villages, supporting a range of local employment, services and facilities.

South Wiltshire Housing Market Area

- 4.62** Overall, the scale of development at urban areas matches the intention of the strategy in terms of how much growth is focussed on the main settlements. There are minor differences between indicative and proposed levels that are not significant. They would not present new or significant issues for local infrastructure and environmental capacity. Less provision is made for rural areas.

Table 4.11 South Wiltshire HMA - Distribution of housing development 2006-2026

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	%Variation
Urban areas					
Amesbury, Bulford and Durrington	2440	1,311	1,101	2412	-1%
Salisbury	6,060	2,273	3,833	6,637	10%
Wilton		323	208		
TOTAL	8500	3,907	5,142	9,049	6%
Rural areas					

Amesbury CA remainder	345	179	58	237	-31%
Mere CA remainder	50	37	5	42	-15%
Mere (LSC)	235	126	139	265	13%
Downton (LSC)	190	88	105	193	2%
Tisbury (LSC)	200	170	5	175	-12%
Wilton CA remainder	255	115	11	126	-51%
Southern Wiltshire CA remainder	425	385	78	463	9%
Tisbury CA remainder	220	60	11	71	-68%
TOTAL	1,920	1,160	412	1,572	-18%

- 4.63** The South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire.
- 4.64** Salisbury is the Principal Settlement within the HMA. It is intended to be the primary focus for development, providing significant levels of jobs and homes. Two site allocations of more than 500 dwellings are important to ensuring there is a surety of supply to the end of the period and that the City achieves the role set out in the spatial strategy: Churchfields and land at Netherhampton Road. The first is a strategic site allocated in the WCS. The latter of these, at Netherhampton Road, is an allocation of the Plan.
- 4.65** It is unlikely that all the strategic sites allocated in the WCS for Salisbury would deliver sufficiently within the plan period to meet housing requirements and ensure supply, and therefore land allocated at Netherhampton Road is necessary. A shortage of land could impede the City's prospects and it could also lead to greater development pressures in other settlements in the HMA less suited to growth.
- 4.66** Churchfields is a strategic mixed-use site that Core Policy 20 of the WCS requires to deliver 1100 dwellings by 2026. To be developed, this site requires substantial employment uses to decant and is now expected to commence later than envisaged and much less land for new housing will be available before 2026. It is a complex regeneration project that will take time to deliver and will require other sites to enable existing businesses to relocate.
- 4.67** The site at Netherhampton Road has the ability to address the lack of housing delivery at Churchfields, later within the plan period, and also the potential to provide employment land for Churchfields businesses to relocate, thereby freeing up land at Churchfields for housing delivery in the longer term. The WCS identifies the site within an area of search, to be considered if further land is required in future to meet housing requirements, as part of the Council's monitoring process. Monitoring has shown that further land is required due to the redevelopment of Churchfields taking longer than anticipated. The Plan therefore implements this contingency in order to ensure a sufficient supply of housing. The allocation of land at Netherhampton Road, a substantial site, will not lead to an increase in the overall scale of housing growth at Salisbury than was proposed by the WCS.

- 4.68** Recognising the scale of the site, a generous lead in time is provided for the delivery of Netherhampton Road. The site is not expected to contribute to housing delivery for several years whilst work is carried out to masterplan the site and develop mitigation measures. In the meantime, supply from major schemes such as Fugglestone Red and Longhedge will ensure sufficient supply. Churchfields and Netherhampton Road sites will deliver new homes alongside each other toward the end of the plan period.
- 4.69** Further sites at Salisbury support provision for primary education in the south of the City. They improve choice. They also help to safeguard land supply should there be unforeseen and serious delay with the delivery of any other sites.
- 4.70** Provision for the rural areas of the HMA can be divided between growth at Local Service Centres and elsewhere, including Large Villages.
- 4.71** Local Service Centres are defined as smaller towns and larger villages which serve a surrounding rural hinterland and possess a level of facilities and services that together with improved local employment, provide the best opportunities outside the Market Towns for greater self containment. Levels of housing development envisaged at Mere and Downton fit with that strategy. The level of development proposed for Tisbury is lower. There is a significant brownfield site option under consideration through the neighbourhood planning process that takes priority over consideration of greenfield alternatives. This would meet indicative requirements at the settlement.
- 4.72** In terms of the wider rural area, overall, given the flexibility that should be associated with indicative requirements there is no fundamental conflict with the spatial strategy and proposals are in general conformity with the WCS. There are three Large Villages in the rural area around Tisbury all of which are within the Cranborne Chase and West Wiltshire Downs AONB. The Plan does not propose any allocations because of a variety of constraints and a lack of land availability. In the rural area around Wilton, of the two Large Villages, Dinton has already experienced relatively significant growth and at Broad Chalke sites are being investigated through the preparation of a Neighbourhood Plan, although the local primary school has limited capacity to support growth. Neighbourhood planning is suited to addressing local needs in these circumstances.

5. Housing site allocations

Introduction

- 5.1** By assessing each of the settlements identified in Core Policy 1, a site selection process has produced a range of sites suitable for residential development. Scales of development reflect each site's suitability. They also have regard to the role of a settlement and its size as well as the indicative requirements for housing in each community area, as presented in the WCS. Development will be required to provide for the necessary on-site and, where necessary, off-site infrastructure requirements arising from proposals in accordance with Core Policy 3 (Infrastructure requirements).
- 5.2** The design and form of development will accord with policies of the WCS. Core Policy 57 (Ensuring High Quality Design and Place Shaping) requires a high standard of design of all development.
- 5.3** Landscaping will be provided at boundaries and throughout each site retaining and reinforcing as much as possible of existing hedgerow and tree cover. This will often be required in order to establish a visual boundary to a settlement and so help preserve the settlement's character and appearance in the wider landscape as well as protect the amenity of adjoining uses. Core Policies 51 and 52 are particularly relevant (Landscape and Green Infrastructure). Some sites relate to Areas of Outstanding Natural Beauty and building design, layout and landscaping measures will be necessary to deliver a scheme which positively assimilates within the wider landscape setting and reflects the character of the local vernacular in accordance with requirements of Core Policy 51.
- 5.4** An ecological assessment will be required for all sites. The development will protect and improve opportunities for biodiversity and wildlife corridors within and adjoining the site in accordance with Core Policy 50 (Biodiversity and Geodiversity). Most sites proposed are of more than one hectare, will therefore require flood risk assessment in order to ensure that there is no increase in risk of flooding on site and elsewhere, and will need to comply with Core Policy 67 (Flood Risk) with regard to flood risk.
- 5.5** Development has the potential to affect the significance of a range of heritage assets within or beyond site boundaries. Where necessary a heritage assessment will prescribe measures which will need to be incorporated as part of a scheme in order to protect them, including the importance of their settings. The determination of planning applications will follow the approach set out in National Planning Policy Framework (paragraphs 131 to 135) and satisfy requirements of Core Policy 58 (Ensuring the Conservation of the Historic Environment) of the WCS. This should include archaeological assessment where necessary
- 5.6** Transport impacts from a proposal will also need detailed assessment in order to accord, in particular, with Core Policy 62 (Development Impacts on the Transport Network). Depending upon the characteristics of individual sites, other policies of the core strategy will be relevant to the determination of planning applications for each of the sites proposed.
- 5.7** The Council will seek a proportion of new homes as affordable housing in accordance with Core Policy 43 (Providing Affordable Homes).
- 5.8** In addition to Community Infrastructure Levy, the Council will also seek funding contributions toward infrastructure or mitigation that is not identified for levy funding and which is directly related to development and necessary for it to proceed. Satisfying the requirements of Core Policy 3 will therefore also be important.

- 5.9** Proposals for new housing sites must be read in conjunction with the Wiltshire Core Strategy and will be considered against all relevant policies, including those relating to place shaping and high quality design. Developers of more substantial sites will also prepare Sustainable Energy Strategies setting out how proposals meet carbon reduction targets, and identifying how maximum targets can be achieved, particularly where lower cost solutions are viable (such as combined heat and power).
- 5.10** Standards for provision to meet leisure and recreation needs of any application will be applied to each of the proposals. An audit of existing open space assets will inform outdoor sports provision. Shortages of amenity green space, parks and areas for informal recreation may be addressed by provision for open space by proposals but will solely be of a form and scale to meet the needs of new development.
- 5.11** As appropriate, additional evidence will need to be prepared at a level of detail to support a planning application. Such new evidence can be used as a material consideration when considering a specific planning application. In many cases, particularly important items are referred to for each allocation. Such evidence may include, but is not limited to a Landscape and Visual Impact Assessment, Heritage Impact Assessment, Biodiversity Report, Surface Water Management Plan, Flood Risk Assessment and Transport Statement.
- 5.12** Sites are proposed at some settlements that involve a mix of uses more than housing development, and where development will be guided by a master plan. The master plan will show parameters governing the distribution of land uses for each site. These sites each have a detailed policy reflecting more extensive site specific requirements setting out the components of development and/or requirements to ensure it takes an acceptable form. These sites are:

Table 5.1 Plan site specific policies

Community Area	Site Name	Policy
Tidworth	Empress Way, Ludgershall	H1.1
Trowbridge	Elm Grove Farm, Trowbridge	H2.1
Warminster	East of the Dene, Warminster	H2.7
Chippenham	The Street, Hullavington	H2.10
Salisbury	Netherhampton Road, Salisbury	H3.1

East Wiltshire Housing Market Area

- 5.13** Land for housing development is identified to support the role of settlements in the East Wiltshire HMA, to ensure supply, improve choice and competition in the market for land.

Policy H1

Land is allocated for residential development at the following sites, as shown on the policies map:

Table 5.2 East Wiltshire Housing Market Area

Community Area	Reference	Site Name	No of dwellings
Tidworth	H1.1	Empress Way, Ludgershall	270
Devizes	H1.2	Underhill Nursery, Market Lavington	50
	H1.3	Southcliffe, Market Lavington	15
	H1.4	East of Lavington School, Market Lavington	15

- 5.14** How these sites were selected is explained in the Community Area Topic Papers⁽¹⁶⁾.
- 5.15** The specific requirements and form development will take are described below for each site to ensure they are each appropriate in scale and character to their location and in accordance with WCS and national policy.

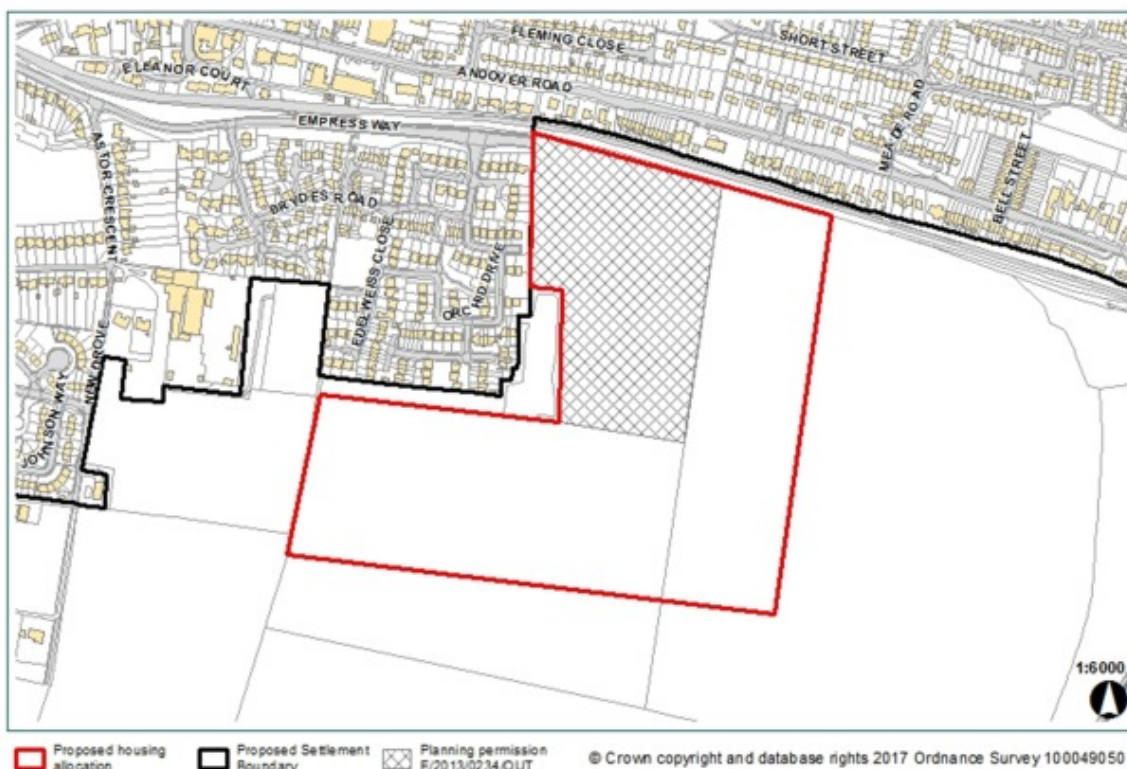
Ludgershall

- 5.16** Ludgershall, along with Tidworth is designated as a Market Town and has the potential for significant development. The WCS envisages Ludgershall, together with Tidworth, accommodating approximately 1,750 additional dwellings over the plan period. As a part of the settlement strategy, an increase in jobs and homes in the town will help to enhance services and facilities and promote better levels of self-containment and viable sustainable communities (Core Policy 1, WCS). Further development will support it carrying out this role.

16 Tidworth Community Area Topic Paper, Wiltshire Council, (June 2017) and Devizes Community Area Topic Paper, Wiltshire Council, (June 2017)

H1.1 Empress Way

Figure 5.1 H1.1 Empress Way



Policy H1.1

Land at Empress Way, as identified on the Policies Map, is proposed for mixed use development comprising the following elements:

- approximately 270 dwellings;
- a connecting highways link between Empress Way and Simonds Road/New Drive, via the adjoining development at the former Granby Gardens site;
- 1.8ha of land reserved for a two form entry primary school.
- A strong landscape framework including significant screening to the southern and eastern boundaries of the site

Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.

- 5.17** Approximately 16.5ha of land at Empress Way, as shown on the policies map, are allocated for development. The proposal is to extend land already with permission⁽¹⁷⁾ for housing development to allow for a further 160 dwellings. The total amount of development will therefore be 270 dwellings. The treatment and design of the site will be one comprehensive development proposal.

17 Outline planning permission reference E/2013/0234/OUT (land adjacent to Empress Way).

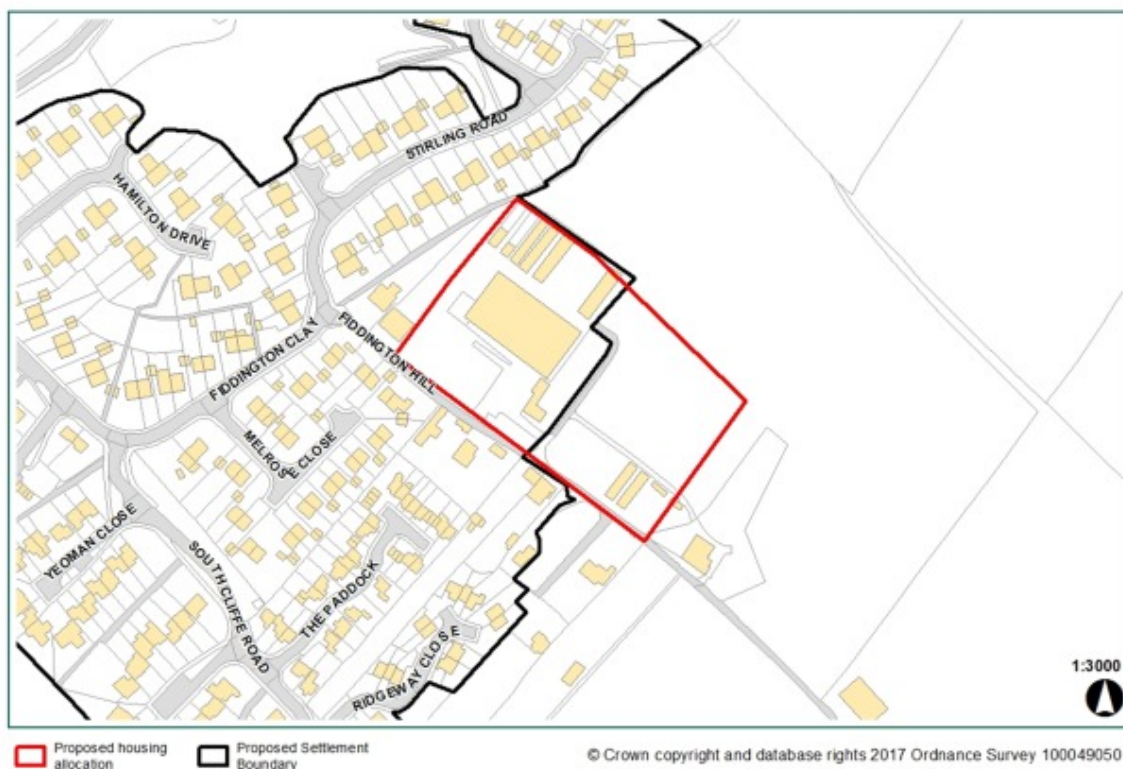
- 5.18** The site is formed of agricultural land on the southern edge of the town. It is a logical extension to the town in an accessible location with regard to local services and facilities but there are limited established natural boundaries that help to enclose the site. There are no field boundaries on the site's southern and eastern edges, although there is limited screening on the boundaries adjoining the railway line and existing residential development.
- 5.19** Vehicular access to the site would be required from Empress Way and via the Granby Gardens development site. Development of the site will include a connecting link road through the site to the two points of access. Transport assessment will inform detailed measures to mitigate impacts on the local road network, including the A342 Andover Road, Memorial Junction and the capacity of the signals on the nearby railway bridge.
- 5.20** Development of the site will include 1.8ha reserved for a 2 form entry primary school. Based on current estimates local primary school capacity will be absorbed by committed development elsewhere in the town. The need to retain the reserved land for a school will be determined as part of the application process based on demand for primary school places at that time.
- 5.21** The site design will be led by a strong landscape framework. Significant additional screening at the southern and eastern site boundaries would be required, along with landscaping and green infrastructure throughout the site as there are middle and long distance views of the site from the south. The final design and layout should be informed by a Landscape and Visual Impact Assessment.

Devizes Community Area Remainder

- 5.22** Market Lavington is designated as a Local Service Centre and, as such, is a focus for modest growth. The village has not grown significantly in recent years and in the remainder of the Plan period additional housing development would support local facilities and contribute to achieving improved self-containment. A total of three sites, as shown on the Policies Map, are allocated for the development of a total of approximately 80 dwellings.
- 5.23** Assessment demonstrates that Market Lavington has two specific considerations to be addressed in order for housing development to be accommodated:
- **Surface water management and flood risk:** parts of Market Lavington are affected by surface water flooding during extreme weather events. In part this is due to the village's proximity to the chalk escarpment associated with the Salisbury Plain. Applications for development at Market Lavington will need to be supported by a comprehensive drainage strategy that ensures the development will be accommodated with improved drainage of the site.
 - **Traffic:** There are particular concerns about impacts on congestion on the High Street and the crossroads at nearby West Lavington. Where possible, housing schemes should include measures to encourage walking and cycling by improvements to local public rights of way and cycle routes. Measures would result from transport assessment required to accompany planning applications for each site.
- 5.24** All the allocated sites are on the edge of the village and visual impacts on the wider landscape are a consideration as well as the character of approaches to the settlement. Allocations are outside the conservation area but proposals must have regard to the need to preserve and enhance its character, as well as the significance of Listed Buildings.

H1.2 Underhill Nursery, Market Lavington

Figure 5.2 H1.2 Underhill Nursery, Market Lavington

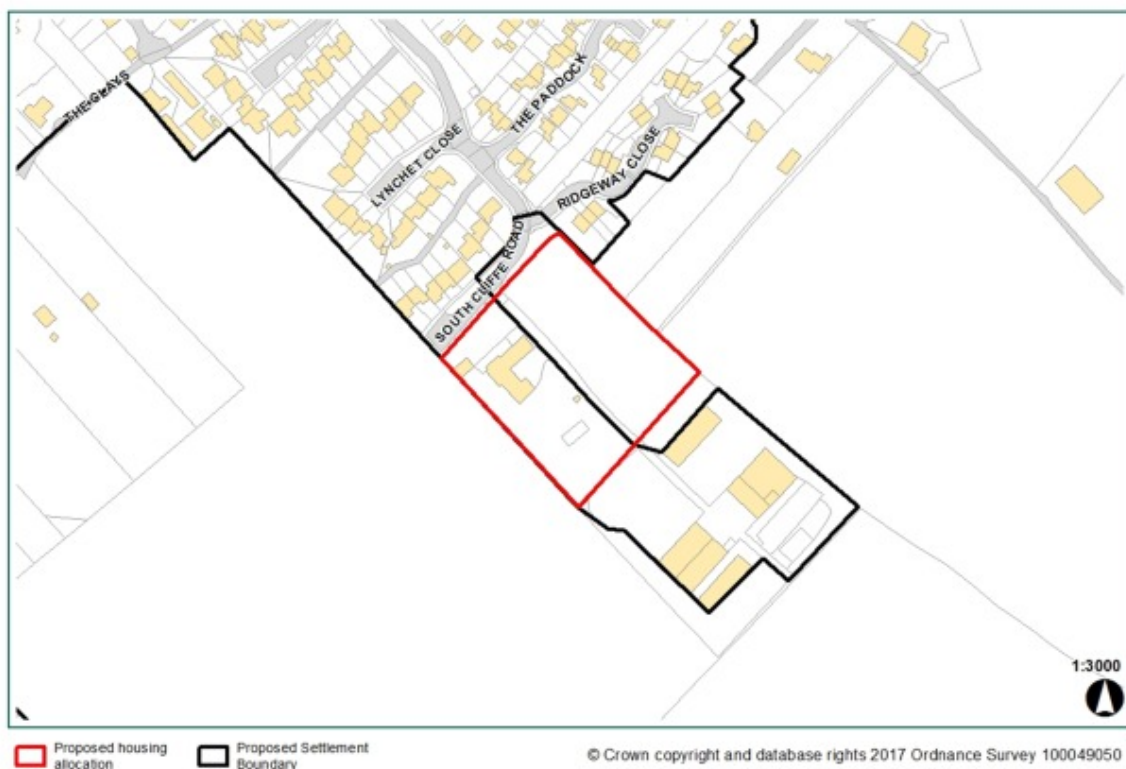


- 5.25** Approximately 2.6ha of land at Underhill Nursery is proposed for the development of approximately 50 dwellings, as identified on the Policies Map. The site is formed from the amalgamation of two SHLAA sites and thereby provides an opportunity to holistically provide a significant level of housing development in a sustainable location, with a consolidated access/egress arrangement, open space and landscaping.
- 5.26** Redevelopment of the former Nursery avoids the premature loss of agricultural land and open countryside. The site is well located with respect to the town centre and facilities such as the primary school and health centre.
- 5.27** Development would need to incorporate measures to address potential impacts on existing residents within the immediate vicinity of the site. This is likely to include, but is not necessarily limited to planting, screening and setting back housing development from the road. Mature trees and hedgerows within the site should be retained and protected as priority habitat. Moreover, all new planting would need to complement and significantly bolster existing patterns of vegetation to soften the south-eastern boundary of the site and increase habitat connectivity.
- 5.28** Development proposals must also demonstrate how the character and distinctiveness of the village, its surrounding countryside have been taken into account in the design of any layout. Site boundaries would need to be softened through landscaping and planting to reduce the impact of development on surrounding countryside.
- 5.29** Records show the potential for contamination from the site's previous use as a plant nursery, and this will need to be investigated through a land contamination survey and any measures this suggests incorporated in the design and layout of a scheme.

- 5.30** A small area of surface water flooding has affected the site in the past and flood risk assessment will have to pay particular regard to this element including preventing increased risks of flooding off-site.
- 5.31** Medieval remains have been found on and adjacent to the site. Therefore, further investigation and mitigation would be necessary. An archaeological assessment would therefore be required to support any subsequent planning application.
- 5.32** The site is adjacent to the bridleway (MLAV24 / EAST22) which follows the western boundary of the site. In line with the need to encourage sustainable modes of transport and avoid exacerbating parking and congestion along the High Street, comprehensive development of this site (alongside Fiddington Hill) provides an opportunity to upgrade/improve the surface of the bridleway and widen it wherever possible. This would help to meet the demand of new residents to travel to the village centre, thereby providing a direct, traffic-free link for walkers and cyclists through the site.
- 5.33** Part of the site falls within Groundwater Source Protection Zone 2. Therefore the Environment Agency must be consulted on any development proposals in order to inform the scope of mitigation measures.

H1.3 Southcliffe, Market Lavington

Figure 5.3 H1.3 Southcliffe, Market Lavington

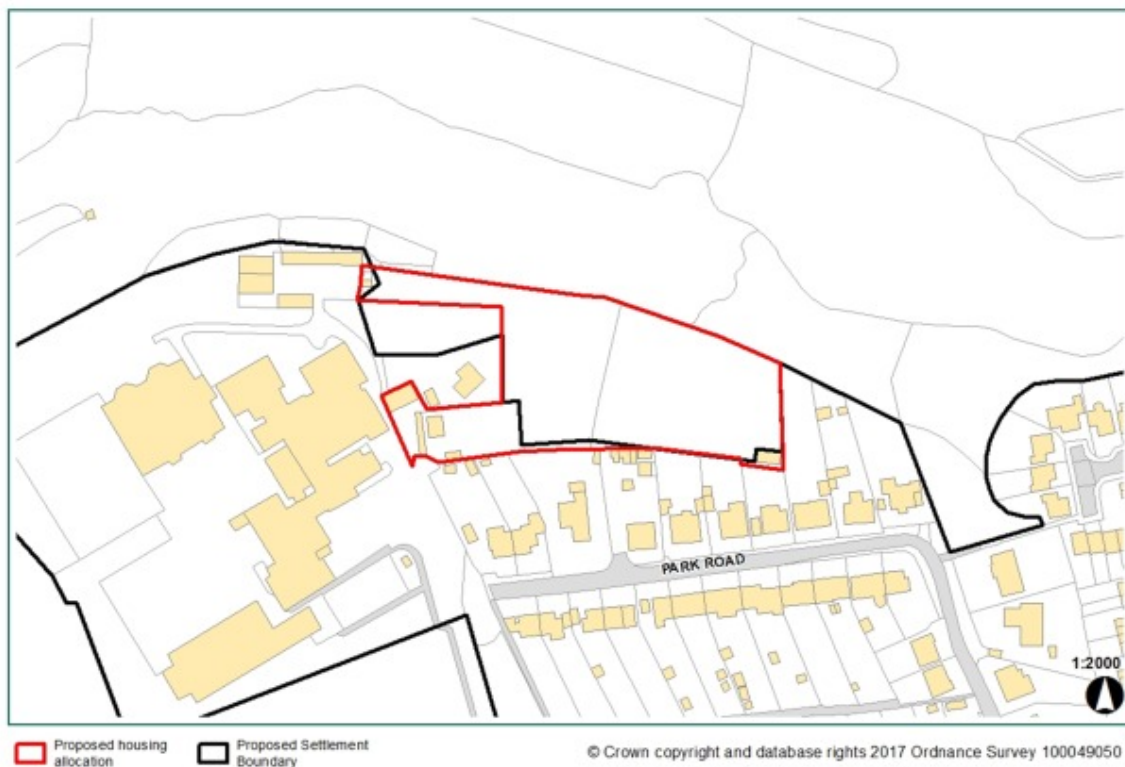


- 5.34** Approximately 0.9ha of land at Southcliffe, as identified on the Policies Map, is proposed for development of approximately 15 dwellings. It is within 1km of facilities such as the primary school, health centre and shop.

5.35 The site lies between a residential area and business park and a single dwelling currently exists on the site. Impacts of development on the existing residential properties and the business park (and vice versa) would need to be assessed and used to guide detailed design and layout of a comprehensive redevelopment scheme. This site is currently bisected by a road that will be retained in order to maintain access through to the adjacent business park. Mature trees alongside the road are a wildlife corridor and priority habitat. The corridor would be retained in detailed design and layout of a scheme.

H1.4 East of Lavington School, Market Lavington

Figure 5.4 H1.4 East of Lavington School, Market Lavington



5.36 Approximately 0.6ha of land to the east of Lavington School, as identified on the policies map, is proposed for development of approximately 15 dwellings.

5.37 The site is a field at the north-western edge of the village, adjacent to Manor House Woods County Wildlife Site. Proposals must protect the ecological interest of this designation. Where necessary, mitigation measures will be provided. Mature trees and hedgerows must be retained and additional planting will increase habitat connectivity enhancing biodiversity interest. The site is adjacent to an existing residential area and the school (along with the caretaker's residence). Access to the site would need to be shared with the school. Proposals would need to demonstrate that access arrangements, as well as the housing layout, would not have an adverse impact on the operation of the school. A flood risk assessment would be required and appropriate surface water management measures incorporated. Moreover, impacts of development on existing residential properties (and vice versa) would also need to be assessed through the detailed design and layout process.

North and West Wiltshire Housing Market Area

- 5.38** Land for housing development is identified to ensure supply, support the role of settlements in the North and West Wiltshire HMA, and improve choice and competition in the market for land.
- 5.39** As a Principal Settlement, the WCS anticipates that Trowbridge will be a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period to 2026. Additional allocations are therefore made to support this role.
- 5.40** Other allocations are made at Warminster, a Market Town, to support its role and at designated Large Villages in the rural parts of Chippenham, Malmesbury and Westbury Community Areas geared to support local needs in accordance with WCS Core Policy 2.

Policy H2

Land is allocated for residential development at the following sites, as shown on the policies map:

Table 5.3 North and West Wiltshire Housing Market Area

Community Area	Reference	Site Name	No of dwellings
Trowbridge	H2.1	Elm Grove Farm, Trowbridge	200
	H2.2	Land off the A363 at White Horse Business Park, Trowbridge	150
	H2.3	Elizabeth Way, Trowbridge	205
	H2.4	Church Lane, Trowbridge	45
	H2.5	Upper Studley, Trowbridge	20
	H2.6	Southwick Court, Trowbridge	180
Warminster	H2.7	East of the Dene, Warminster	100
	H2.8	Bore Hill Farm, Warminster	70
	H2.9	Boreham Road	30
	H2.10	Barters Farm Nurseries, Chapmanslade	35
Chippenham	H2.11	The Street, Hullavington	50
	H2.12	East of Farrells Field, Yatton Keynell	30
Malmesbury	H2.13	Ridgeway Farm, Crudwell	50
Westbury	H2.14	Off B3098 adjacent to Court Orchard / Cassways, Bratton	40

5.41 How these sites were selected is explained in Community Area Topic Papers⁽¹⁸⁾.

5.42 The specific requirements and form development will take are described below for each site to ensure they are each appropriate in scale and character to their location and in accordance with WCS and national policy.

Trowbridge

5.43 The WCS envisages approximately 6,810 new dwellings at the Principal Settlement of Trowbridge over the Plan period (2006-2026). Whilst much of this has either been delivered, or is committed in the form of planning permissions and a strategic site allocation in the WCS (Ashton Park), a significant volume of additional housing will be required in order to help address residual indicative requirements.

5.44 In the face of the need to identify sites for additional housing at the town, there are significant ecological, landscape (Green Belt) and infrastructure constraints that significantly limit the choice of available sites. Assessment evidence demonstrates three considerations to be addressed in order for housing development to be accommodated:

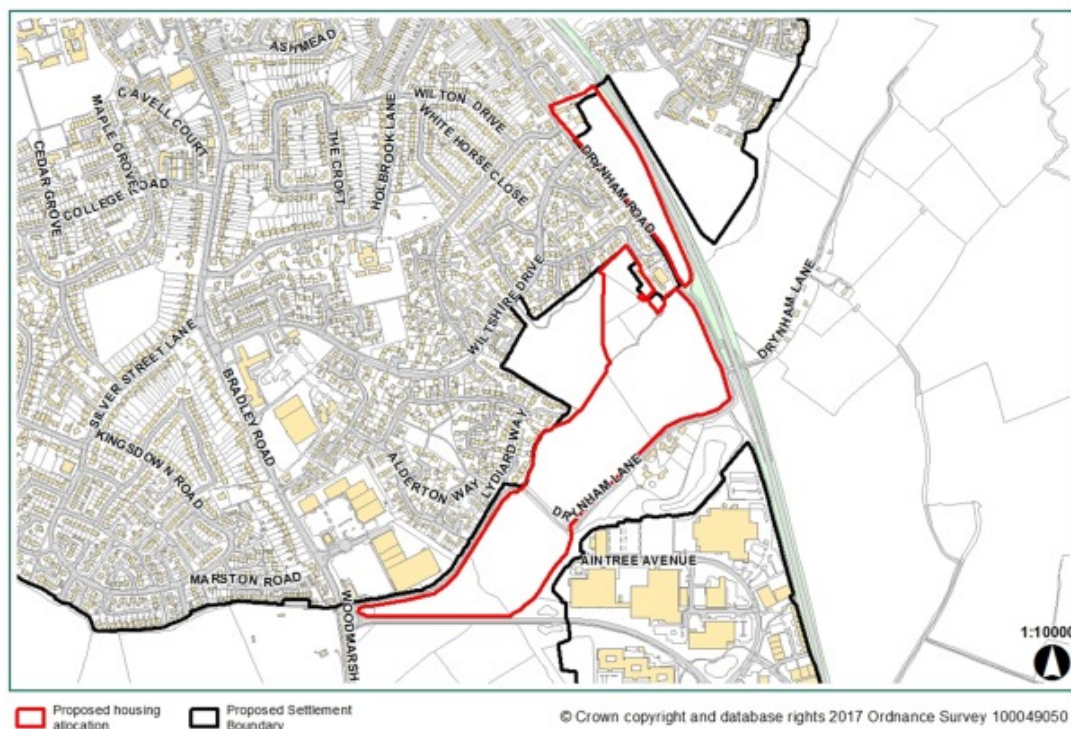
- **Ecology:** an interconnected pattern of priority Biodiversity Action Plan (BAP) habitats such as mature hedgerows, trees and water features, along with designated woodland features around the town support significant populations of protected bat species associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). Additional housing development will increase the population of the town and thereby amplify the risk of recreational pressure on bats. To address this issue, the Habitats Regulations Assessment (HRA) for the Plan recommends developing a strategy for managing recreational pressure across the town. Detailed design and layout of schemes would need to consider additional planting and open space to protect and enhance these BAP priority habitats and thereby augment opportunities for bat foraging routes and roosting sites. This could include establishing dark corridors through sites to protect foraging routes and roosting areas for bats. Specific measures that will be required are explained for each site and funding contributions may be sought toward measures to be contained in the Trowbridge Recreation Management Mitigation Strategy.
- **Education:** development will increase the number of pupils needing primary school places. A local lack of capacity across the town affects proposals allocated for development. With the majority of proposed housing being directed south/south-west of the town, the evidence points directly to the need for a new primary school in this area. Therefore, in addition to land reserved for one new school, funding contributions will be sought from developers to help provide adequate capacity.
- **Health Services:** development will also increase demand for primary health care and funding contributions may also be sought to expand the capacity of GP services and dentistry. Contributions will be justified on a site by site basis in discussion with Clinical Commissioning Group and NHS England.

5.45 The proposed site allocations are capable of delivery and will provide a boost to local housing supply.

18 Trowbridge Community Area Topic Paper, Wiltshire Council (June 2017), Warminster Community Area Topic Paper, Wiltshire Council (June 2017), Chippenham Community Area Topic Paper, Wiltshire Council (June 2017), Malmesbury Community Area Topic Paper, Wiltshire Council (June 2017) and Westbury Community Area Topic Paper, Wiltshire Council (June 2017).

H2.1 Elm Grove Farm

Figure 5.5 H2.1 Elm Grove Farm



Policy H2.1

Approximately 14.33ha of land at Elm Grove Farm, as identified on the Policies Map, is proposed for mixed use development comprising the following elements:

- Approximately 200 dwellings;
- At least 1.8ha of land for a two form entry primary school along with playing pitches;
- A multi-purpose community facility;
- A consolidated public open space area incorporating and augmenting the existing Queen Elizabeth II Field;
- A road from the A363 through to an improved junction of Drynam Lane and Wiltshire Drive; and
- New cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site.

Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.

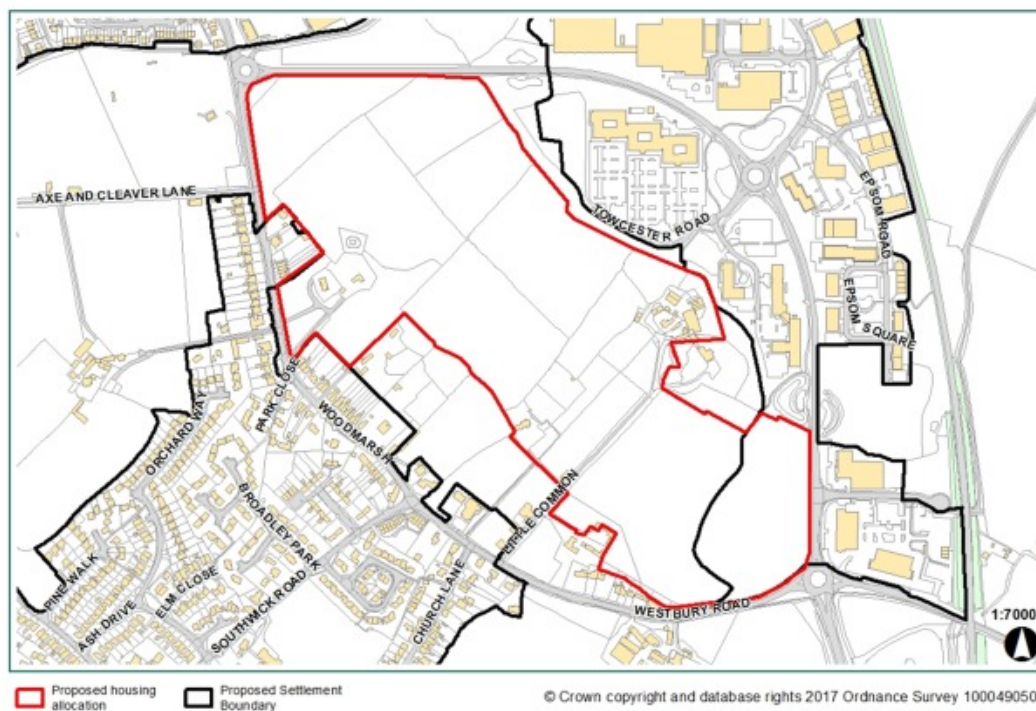
- 5.46** Approximately 14.33ha of land at Elm Grove Farm is allocated for the development of approximately 200 dwellings, as shown on the Policies Map. It is well located with regard to local facilities and services. Moreover, the site is enclosed to the north-west and south-east by existing development and development proposed further south. Consequently, development of the site would not lead to a significant encroachment of further built form into the countryside. In order to accommodate the educational needs of new development

the site would accommodate a new primary school to serve the area alongside new housing. This with a multi-purpose community building geared toward use by sports and social groups in the area could provide a local centre to the development.

- 5.47** The existing natural features of the site are significant in the landscape and would need to be incorporated within a detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.
- 5.48** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on and adjacent to the site. These would include Drynham Lane / Road, the railway line, woodland belts associated with the White Horse Business Park and the small tributary to the River Biss.
- 5.49** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy.
- 5.50** Access to the site would need to be holistically planned with upgrades required to Drynham Lane, along with the construction of a connection to the A363 designed as a through-route anticipating future traffic growth. New and improved walking and cycling routes to existing and planned local services would encourage future residents to use sustainable forms of transport, The site has a medium potential for archaeological remains. Therefore any subsequent planning application should be informed by an archaeological assessment. In addition, development will need to minimise the potential to harm the significance of the Grade II Listed Drynham Lane Farmhouse. Measures may also be necessary to prevent potential noise pollution from the existing main road and railway. These considerations should be addressed through the process of detailed design and layout which should be informed through a Heritage Impact Assessment.
- 5.51** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

H2.2 Land off the A363 at White Horse Business Park

Figure 5.6 H2.2 Land off the A363 at White Horse Business Park

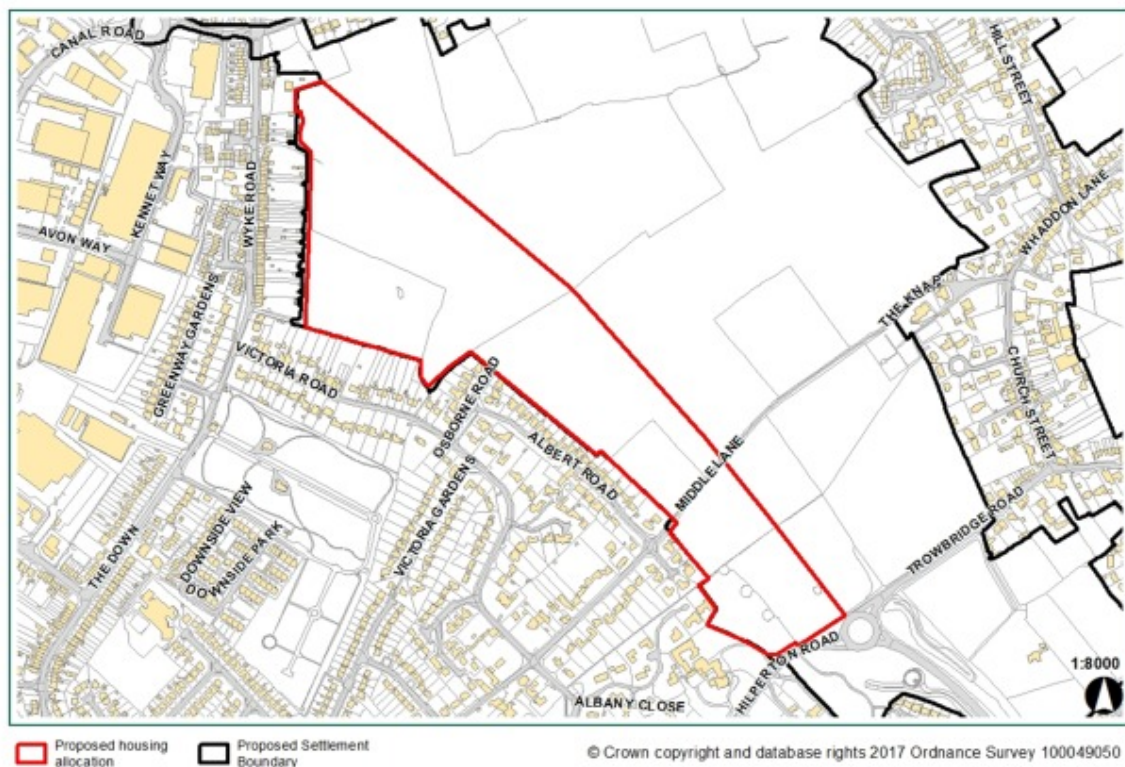


- 5.52** Approximately 25.26ha of land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 dwellings, as identified on the Policies Map. It is reasonably well located with regard to services and facilities. The site extends over a significant area of agricultural land used for a mix of grazing and arable cropping. It is contained, to a degree, by existing development to the east and west and fronts a 'gateway' route to the town. An objective of detailed design and layout will be to retain visual separation of the Town's urban area from North Bradley village. To achieve this, development proposals would need to be focussed within the north-east of the site, screened with new planting and provide improvements to walking and cycling routes through to the town.
- 5.53** The site is characterised by a distinctive pattern of mature and semi-mature hedgerows and trees that form a feature in the landscape. Development of the site would need to retain these features and thereby provide a layout that respects the setting of North Bradley village as an important element of detailed design. Existing hedgerows and trees also provide habitat for protected and non-protected species. These natural features therefore provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats.
- 5.54** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: woodland belts associated with the White Horse Business Park; a network of mature hedgerows/hedgerow trees; and the grounds of Willow Grove.
- 5.55** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy.

- 5.56 Proposals would need to provide for a high quality, sustainable development that enhances a key gateway approach to the town, whilst protecting the integrity of North Bradley as a village.
- 5.57 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

H2.3 Elizabeth Way

Figure 5.7 H2.3 Elizabeth Way

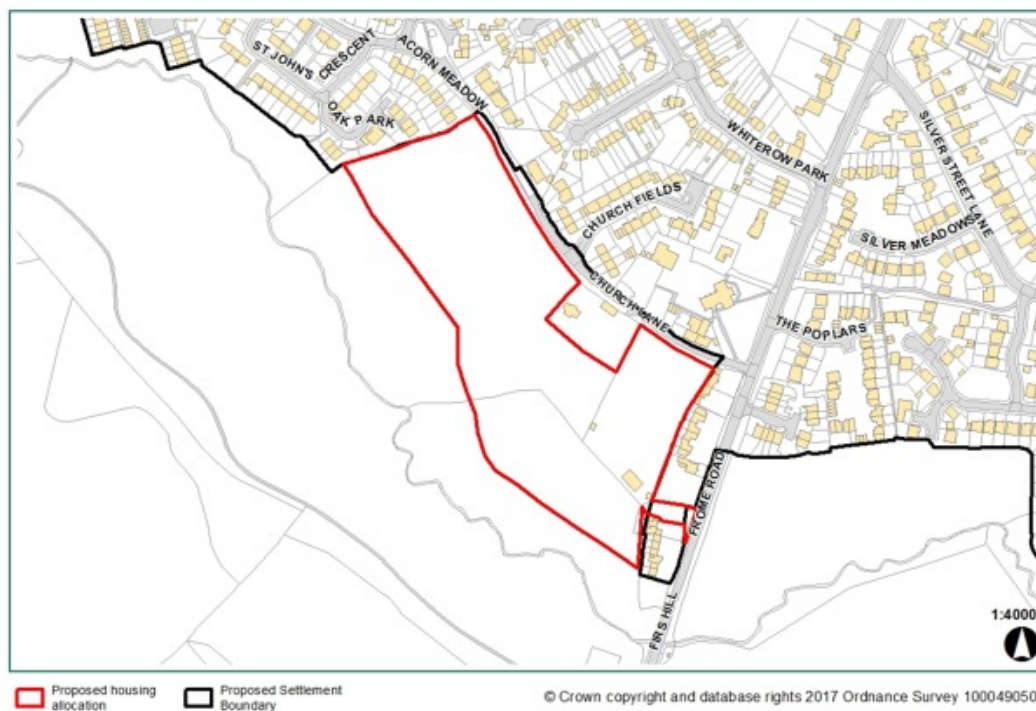


- 5.58 Approximately 16.33ha of land to the South West of Elizabeth Way is allocated for the development of approximately 205 dwellings, as identified on the Policies Map. The site extends over a significant area of agricultural land quite markedly enclosed by existing development and Elizabeth Way distributor road. The character of the land within the site is relatively open and offers views through the existing urban edge of the town and the village of Hilperton. The dominant feature in the landscape is Elizabeth Way which would serve as access to the site.
- 5.59 Mature and semi-mature hedgerows and trees are key features in the landscape and provide habitat for protected and non-protected species. The existing natural features of the site are significant in the landscape and would be incorporated within the detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.
- 5.60 This site may be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Potentially sensitive habitat features on / adjacent to the site include: mature trees; hedgerows; and stream (minor watercourse) at the northern end of the site

- 5.61** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats.
- 5.62** Development will also be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy through a financial contribution or direct provision of equivalent new infrastructure over and above normal Council requirements to deliver new habitat and recreational opportunities in line with criteria in the Strategy.
- 5.63** An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road. Consideration of drainage patterns and flood risk from all sources would need to inform any subsequent layout. In addition, surface water attenuation measures and improvements to existing on-site water infrastructure would need to be provided to support a comprehensive development of the site.
- 5.64** The layout and design of the site would need to give great weight to the significance of nearby heritage assets and their setting. Where necessary, stand-offs to existing development in Victoria Road, Albert Road and Wyke Road, along with the incorporation of appropriate boundary treatment would need to be considered through detailed layout and design.
- 5.65** There are opportunities to provide new routes for walking and cycling that would also serve the existing built-up area and that could improve connectivity for a wider area of the town. These should be explored and, wherever practicable, provided in order to encourage a reduction in private car journeys.
- 5.66** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

H2.4 Church Lane

Figure 5.8 H2.4 Church Lane

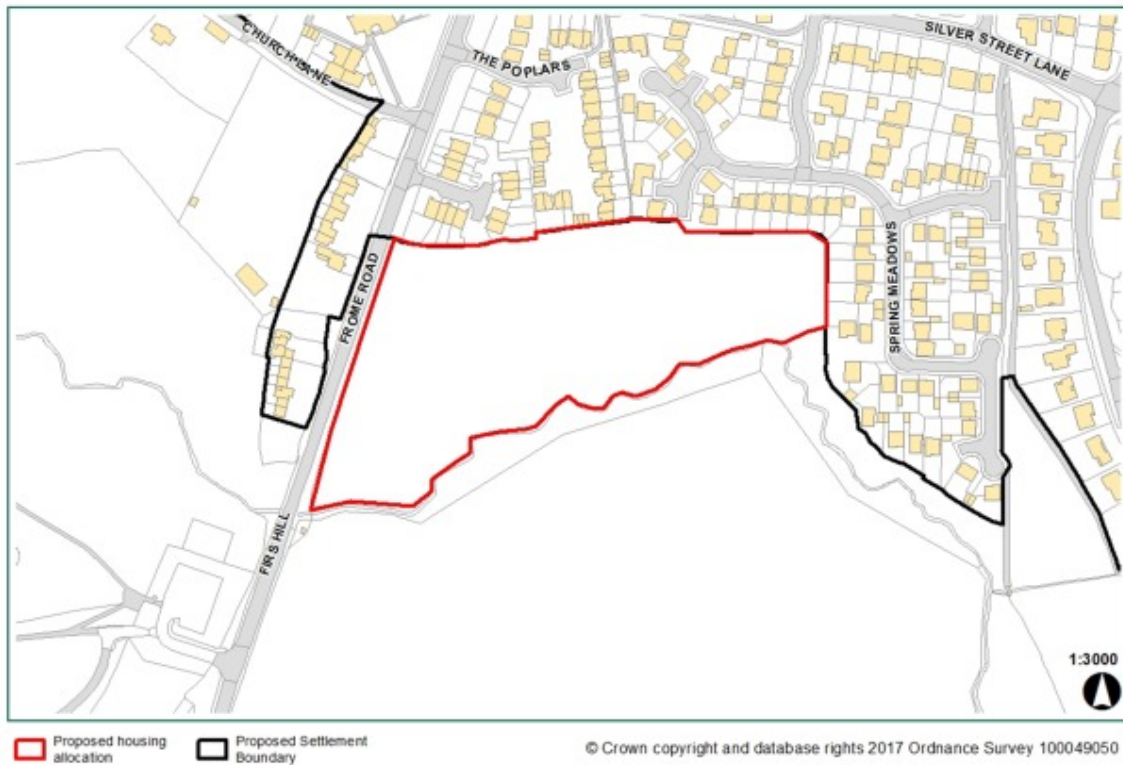


- 5.67** Approximately 3.72ha of land at Church Lane is allocated for the development of approximately 45 dwellings, as identified on the Policies Map. The site lies on the edge of existing built form and the Southwick Country Park. It is an open site that slopes to the south-west towards the Lambrok Stream.
- 5.68** Development proposals would need to ensure that the significance and setting of the Grade II Listed St John's Church would be appropriately protected. To achieve this objective, access to the site would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane.
- 5.69** Proposals would need to provide a design and layout that enhances the urban edge of the town. Existing hedgerows and trees would need to be retained and enhanced through new landscaping features along the line of the Lambrok Stream. Such features would need to be of sufficient scale to protect and enhance the character and amenity provided by Southwick Country Park. Links between the site, the Country Park and existing built form would be achieved through improvements to footpath TROW8.
- 5.70** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: Framfield; boundary hedgerows; and the Lambrok Stream.
- 5.71** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy.

- 5.72** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

H2.5 Upper Studley

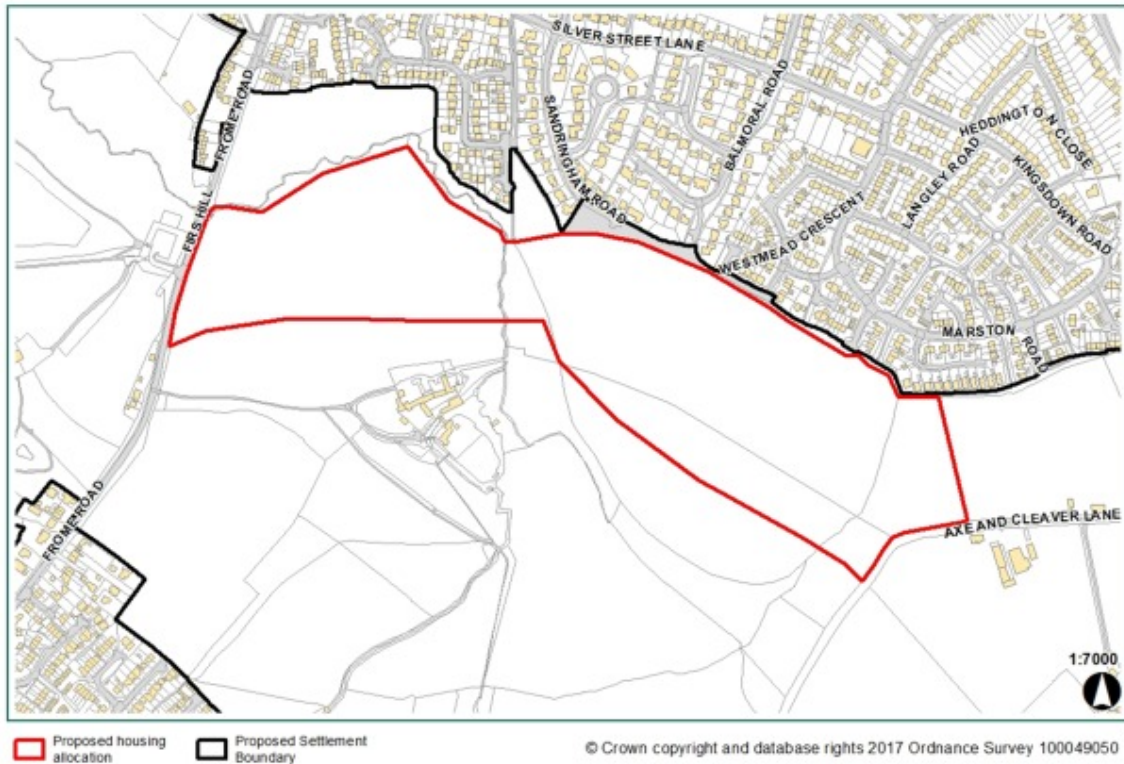
Figure 5.9 H2.5 Upper Studley



- 5.73** Approximately 2.33ha of land at Upper Studley is allocated for the development of approximately 20 dwellings, as identified on the Policies Map. The site has a physical relationship to the Lambrook Stream and recently built developments at Silver and Spring Meadows. The land slopes towards the stream and is bound to the south by tall, mature poplar trees.
- 5.74** An objective of detailed design and layout will be to provide an attractive frontage to Fir's Hill and enhance this approach to the town. The existing natural features of the site are significant in the landscape and would be incorporated within a detailed layout and Lambrook Stream should be enhanced as a local amenity feature of the site in conjunction with development proposed at Southwick Court.
- 5.75** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: boundary hedgerows / tree lines; and the Lambrook Stream.
- 5.76** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy.

H2.6 Southwick Court

Figure 5.10 H2.6 Southwick Court



- 5.77** Approximately 18.17ha of land at Southwick Court is allocated for the development of approximately 180 dwellings, as identified on the Policies Map. The site extends over a significant area of agricultural land. The character of the land is relatively open and offers views to the north towards the existing urban edge of the town and south over land that forms a natural buffer to maintain the separate identity of the village of Southwick.
- 5.78** The area is of historic significance as water meadows associated with the Grade II* Listed Southwick Court Farmstead. An essential objective of detailed design will be to minimise harm to its significance. The setting to this heritage asset will be preserved, to the greatest extent possible, informed by the results of more detailed Heritage Impact Assessment. Taking account of the weight attached to the significance of the asset any residual harm requires a clear and convincing justification and should not be substantial. The social and economic advantages of the development, including the provision of additional homes, achieve substantial public benefits. A comprehensive development scheme will need to ensure that new homes are directed to the east of the Lambrok Stream. Land to the west may become either formal or informal open space or remain in agricultural use, but will not be developed for new homes. The character of the area will therefore help to retain the high significance of this heritage asset.
- 5.79** Landscaping will be an important element of any subsequent scheme. The site represents an expansion of the town into the countryside. Development would therefore replace a substantial length of the town's existing urban edge. To address the impact of change in the landscape a comprehensive landscape treatment would provide an opportunity to improve the impact of the town on the wider landscape and in so doing protect and enhance the

Southwick Court Farmstead. The Lambrok Stream and its respective flood plain should be enhanced as a local amenity feature of the site in conjunction with development proposed at Upper Studley above.

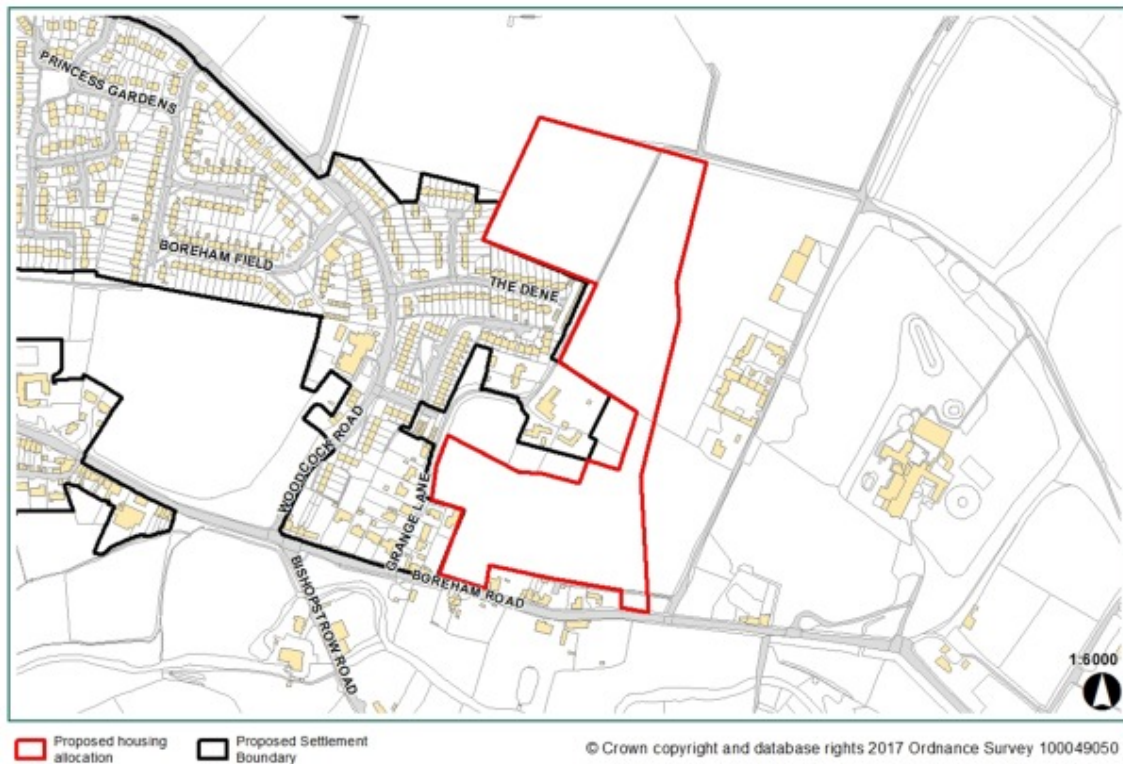
- 5.80** Mature hedgerows and trees (including a solitary veteran Oak tree) are a key feature in the landscape and provide habitat for protected and non-protected species. The existing natural features of the site are significant in the landscape and would be incorporated within a detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.
- 5.81** The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: boundary hedgerows / tree lines; Axe and Cleaver Lane; the Lambrok Stream; and the moat and grounds at Southwick Court.
- 5.82** These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy.
- 5.83** Opportunities to improve walking and cycling routes through the existing built framework should be explored and, wherever practicable, new and improved routes provided in order to encourage a reduction in private car journeys and, in particular, to promote access to the wider countryside.
- 5.84** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

Warminster

- 5.85** Warminster is a Market Town and has the potential to accommodate significant levels of development. As anticipated by the settlement strategy, an increase in jobs and homes in the town would help to enhance services and facilities and promote better levels of self-containment. The WCS envisages Warminster accommodating approximately 1,920 additional dwellings over the plan period (2206 to 2026).
- 5.86** Surface water management at Warminster is a particular issue. Developments will be supported by comprehensive Drainage Strategies that ensure the development will result in improved drainage conditions. Sufficient land will also need to be set aside for surface water management measures.
- 5.87** Development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss / damage. However, the scale of development is within thresholds set down in a Nutrient Management Plan for the river that avoids the likelihood of adverse effects. Nevertheless, impacts are kept under review and this situation may change. Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in an annex to the Nutrient Management Plan.

H2.7 East of the Dene, Warminster

Figure 5.11 H2.7 East of the Dene, Warminster



Policy H2.7

Land east of The Dene, as identified on the policies map, is proposed for development comprising

- approximately 100 dwellings
- 2ha of land undeveloped land to be located in the south west part of the site

Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.

5.88 Approximately 6.84ha of land east of The Dene, as shown on the Policies Map, is allocated for the development of approximately 100 dwellings. The land is in agricultural use. Land adjoining residential development at The Dene is suited to accommodate development in terms of visual impacts in the wider countryside.

5.89 The main access will be from Boreham Road but the south west part of the site is considered to be unsuited to built development because of its sensitivity in heritage and landscape terms. This land may remain in agricultural use or becomes either formal or informal open space, but will be undeveloped so the character of the area continues to preserve the significance of heritage assets.

5.90 The design of an access point should also minimise the loss of high wall that is a characteristic of this approach to the town. Secondary access, in particular for cycling and walking, should also be sought through The Dene and improvements should be made to footpath WARM40.

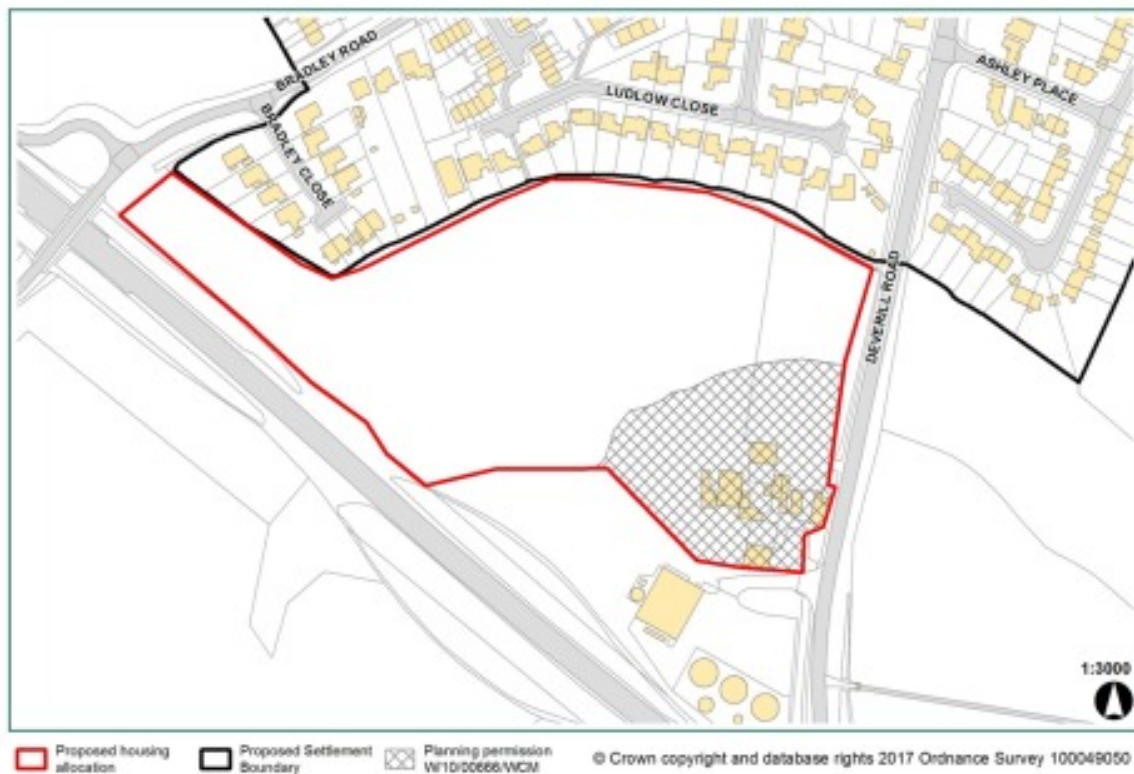
5.91 The site has a number of heritage and related landscape considerations. A sensitively designed scheme should be brought forward which has been informed by a Heritage Impact Assessment and appropriately responds to the character and location of the site and respects the significance of the following heritage assets:

- Listed Buildings in the vicinity of the site, including Bishopstrow House
- Bishopstrow Conservation Area
- Views from Battlesbury Camp hillfort

5.92 In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town.

H2.8 Bore Hill Farm, Warminster

Figure 5.12 H2.8 Bore Hill Farm, Warminster



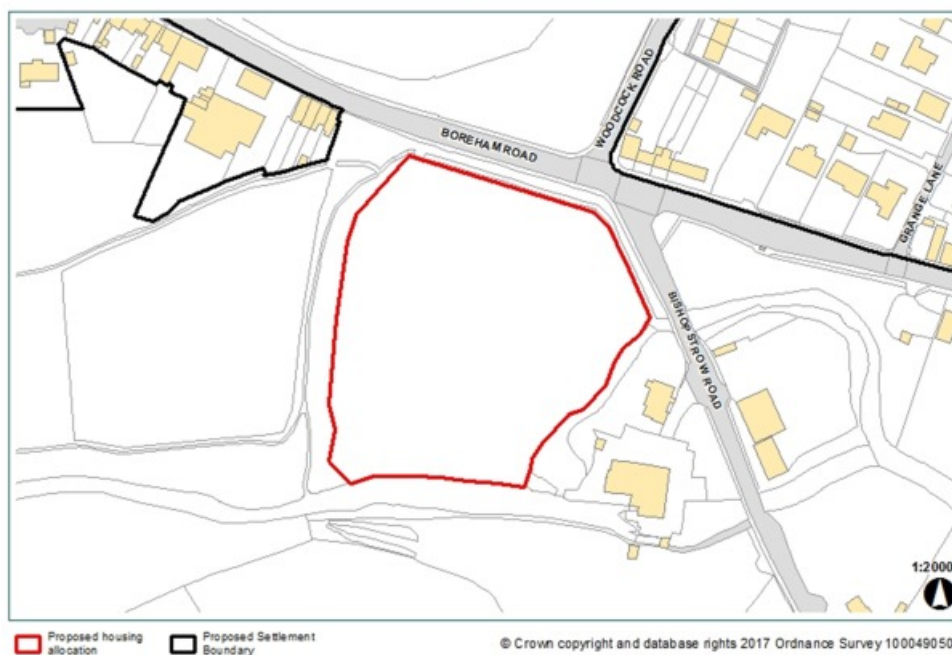
5.93 Approximately 4.47ha of land at Bore Hill Farm/Bradley Road, as shown on the Policies Map, is allocated for the development of approximately 70 dwellings.

5.94 The site is formed of land between the A36 and Deverill Road which lies adjacent to the Bore Hill Farm bio-digester. There is some limited screening on the north boundary with existing development at Bradley Close and Ludlow Close. Additional landscape screening at the site boundaries would be required to preserve and maintain the living conditions of adjoining residential dwellings. Vehicular access will be provided from Deverill Road, and connection to and improvement of public right of way WARM60 should be provided.

- 5.95** The site area includes land at Bore Hill Farm which benefits from extant planning permission for the development of B1 employment units⁽¹⁹⁾. In order to retain the employment generating use of this part of the site, in line with Warminster Neighbourhood Plan Policy W1, development would include approximately 70 dwellings together with B1 employment use. Provision for employment use as part of the development will take the form of land, equivalent in extent to that part of the current planning permission within the allocation, being reserved and marketed as serviced land. It would be located between the operational bio-digester and proposed residential development, to provide separation between these uses. A noise assessment would form part of the planning application process and to inform detailed design and layout.
- 5.96** Future development of the site shall be brought forward in such a way that ensures the residential and employment uses on the site are compatible. In line with WCS Core Policy 41, opportunities should be explored for new development to use energy generated by the adjoining biodigester. In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town.

H2.9 Boreham Road

Figure 5.13 H2.9 Boreham Road



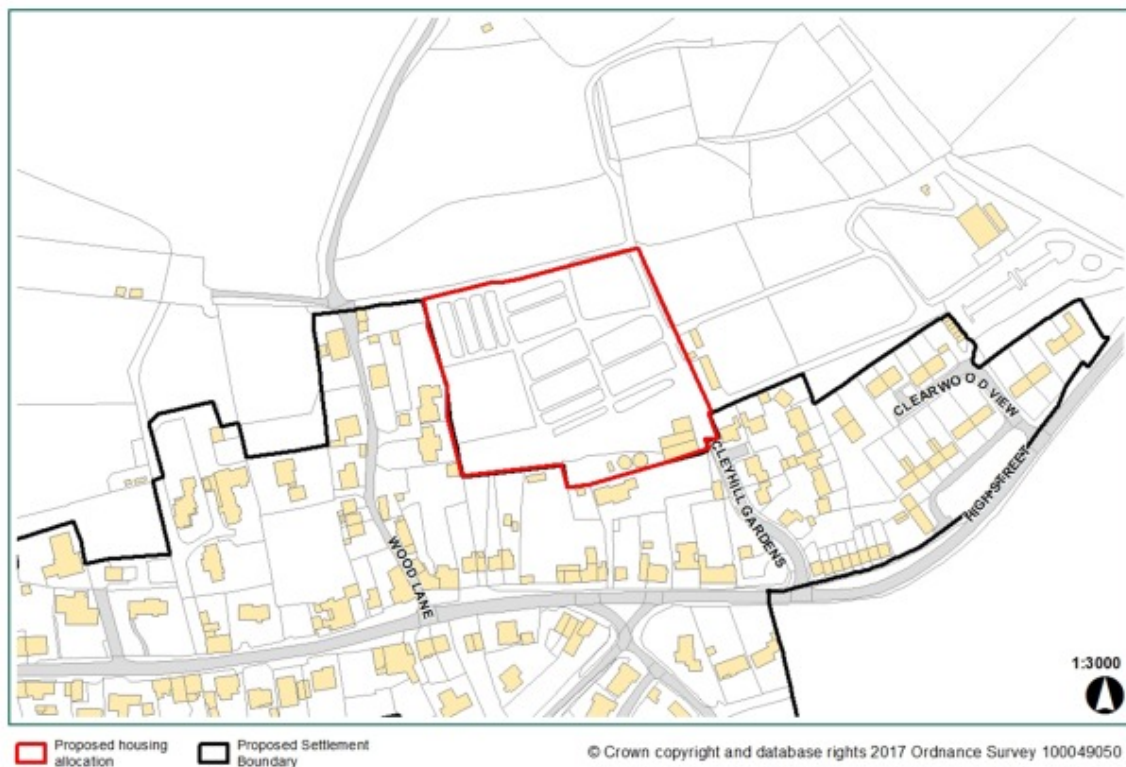
- 5.97** Approximately 1.32ha of land at Boreham Road, as shown on the Policies Map, is allocated for the development of approximately 30 dwellings. It has previously been considered as an opportunity to provide for self build homes and this remains the preferred form of development.
- 5.98** The site comprises relatively low grade agricultural meadow land that, in part, has been used for the disposal of builders' rubble and spoil. It is well contained and framed by existing mature hedgerows and trees. These features provide important habitat corridors and should therefore be retained, protected and, where possible, enhanced through additional planting.

- 5.99 Whilst situated outside the Bishopstrow Conservation Area, the site is considered to lie within the setting of this designated heritage asset. Development of the site would therefore need to respond positively to its surroundings and have due regard to the special character or appearance of the Conservation Area. A Heritage Impact Assessment would be required in order to support and inform any subsequent proposals, including the design of mitigation measures. The setting of heritage assets will be protected so as to ensure, as far as practicable, there will be no substantial harm to their significance.
- 5.100 Development of the site would need to be supported and informed by a Drainage Strategy and water infrastructure capacity assessment. Where necessary, details relating to the reinforcement of existing foul/storm water drainage arrangements would need to be submitted with any subsequent planning application. Drainage measures for the attenuation and management of surface water would need to be capable of achieving greenfield, or better, infiltration rates.
- 5.101 Vehicular access would be achieved from Boreham Road. Details relating to the provision of the junction arrangement; relocation of the Grade II Listed milestone marker; culvert arrangements; closure of existing agricultural field gate and reconstruction of pedestrian footways onto Boreham Road would need to be submitted with any planning application. In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town.

Warminster Community Area Remainder

H2.10 Barters Farm, Chapmanslade

Figure 5.14 H2.10 Barters Farm, Chapmanslade



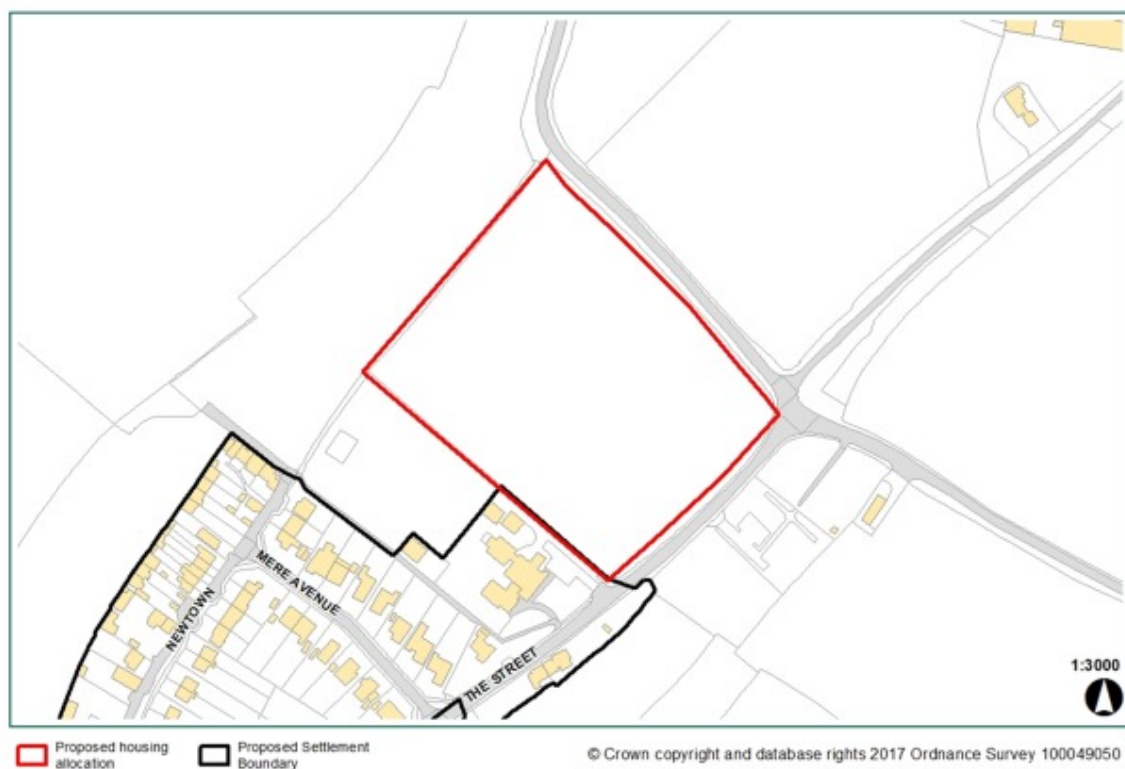
5.102 Chapmanslade is designated as a Large Village where an appropriate level of development is anticipated in order to meet housing needs and improve employment opportunities, services and facilities. Development will provide affordable homes and improved cycling and walking routes to the heart of the village, thereby contributing towards the delivery of the Warminster Community Area Strategy, as anticipated by the WCS.

5.103 Approximately 1.35ha of Land at Barter's Farm is allocated for the development of approximately 35 dwellings, as identified on the Policies Map. As a former nursery and garden centre, development does not result in the loss of agricultural land and open countryside. Within the context of the village, the site is well located and avoids adversely impacting on ecological features such as Ancient Woodland that lies on the periphery of much of the settlement.

Chippenham Community Area Remainder

H2.11 The Street, Hullavington

Figure 5.15 H2.11 The Street, Hullavington



Policy H2.11

Land at the Street, Hullavington, as identified on the policies map, is proposed for development comprising:

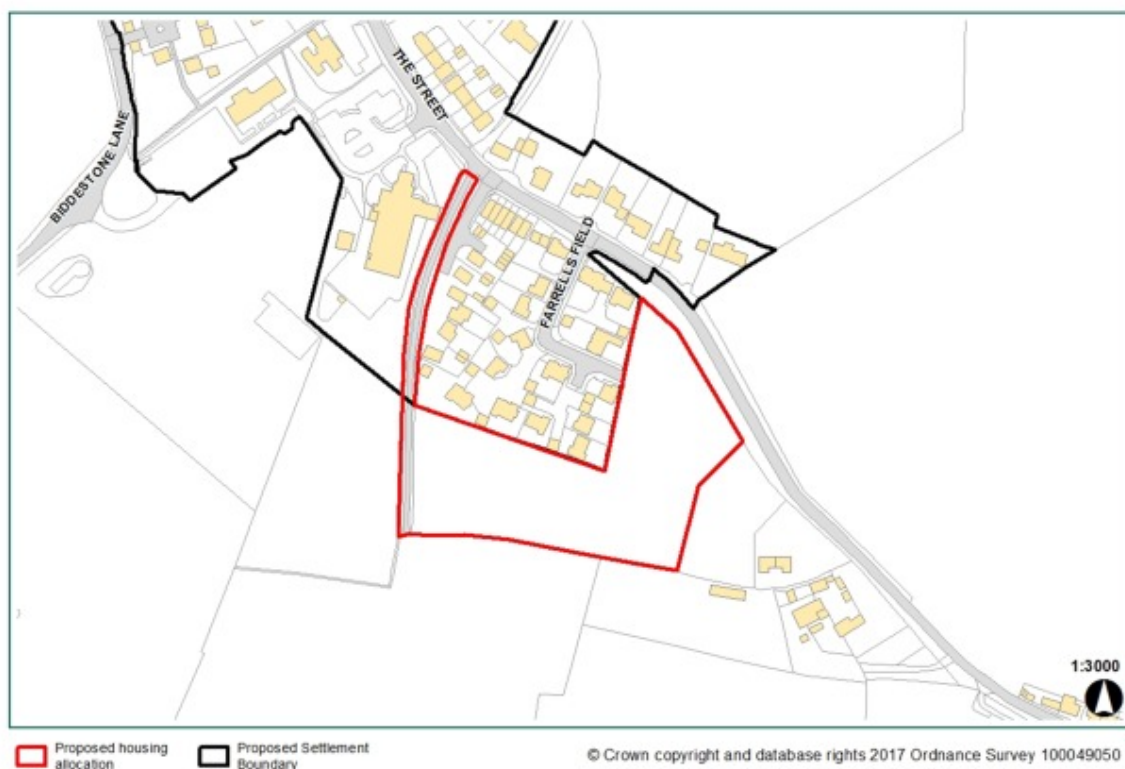
- approximately 50 dwellings.
- 0.2 ha land for primary school expansion

Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.

- 5.104** Hullavington is designated as a Large Village where development is limited to meet local needs. The local primary school is now at capacity. This is a potential barrier to any planned housing development and a situation with the prospect of indefinite strains on local infrastructure. It would also constrain the long term prospects of the village and undermine its role in the spatial strategy. This site provides an appropriate solution to meet local need in accordance with the WCS.
- 5.105** Approximately 2.44ha of land adjacent to the Primary School is allocated for the development of approximately 50 dwellings and 0.25ha to allow for the expansion of the primary school, as shown on the Policies Map. The site is in agricultural use and adjoins the village primary school. The scheme will provide land to expand the school to meet future local needs as well as being necessary to serve pupils from the development itself. In addition to the land provided, funding contributions will also be sought to help secure construction.
- 5.106** Access would be from The Street / Norton Road and would require highway improvement works to the existing junction layout and visibility splays associated with The Street / Norton Road junction. This may include significant alteration/relocation of the existing junction and speed limit adjustments.
- 5.107** A sufficient buffer should be provided to the watercourse to the north of the site to safeguard the function of the tributary to the River Gauze. It also provides options to deliver public open space and biodiversity enhancement. Mature hedgerows and trees would be retained and planting Barberry will enhance habitat for the Barberry Carpet moth, a priority species of the BAP. Development would need to retain the historic footpath through the site to the surrounding countryside. Moreover, footpaths HULL29, HULL1 and HULL33 should be retained and improved as part of the development of the site.

H2.12 East of Farrells Field, Yatton Keynell

Figure 5.16 H2.12 East of Farrells Field, Yatton Keynell

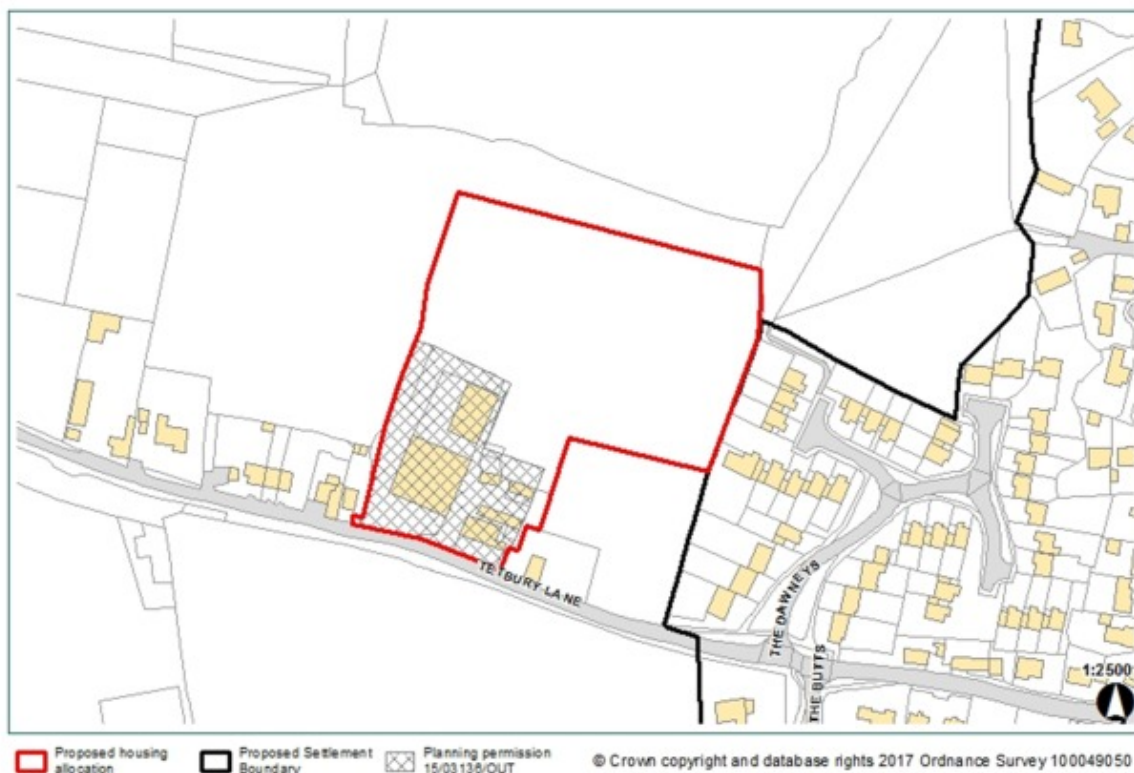


- 5.108** Yatton Keynell is designated as a Large Village where development is limited to meet local needs. Much of the land around the settlement is within the Cotswolds AONB and development at the village is constrained by the importance of the need to conserve the qualities of the designation. An allocation of land that avoids the designation provides for local needs and supports the role of the settlement.
- 5.109** Land East of Farrells Field, Yatton Keynell is allocated for the development of approximately 30 dwellings on approximately 1.3ha of land, as shown on the Policies Map. It is well located with regard to local services and facilities. The site is in agricultural use and represents the continuation of recent development in this part of the settlement.
- 5.110** A woodland corridor along the western boundary should be retained as a wildlife corridor. Retention of the existing boundary vegetation on site would provide screening to reduce the effect on adjacent visual receptors and be in keeping with the existing landscape character. Access would be taken from Farrell Fields and the possibility to link to adjacent footpaths should be explored.

Malmesbury Community Area Remainder

H2.13 Ridgeway Farm, Crudwell

Figure 5.17 H2.13 Ridgeway Farm, Crudwell



- 5.111** Crudwell is designated as a Large Village where development is limited to meet local needs. It has the lowest rate of growth of all the Large Villages in the community area and there is an identified local need for housing. Part of the proposed allocation benefits from an unimplemented planning permission for development⁽²⁰⁾. Development of this site for

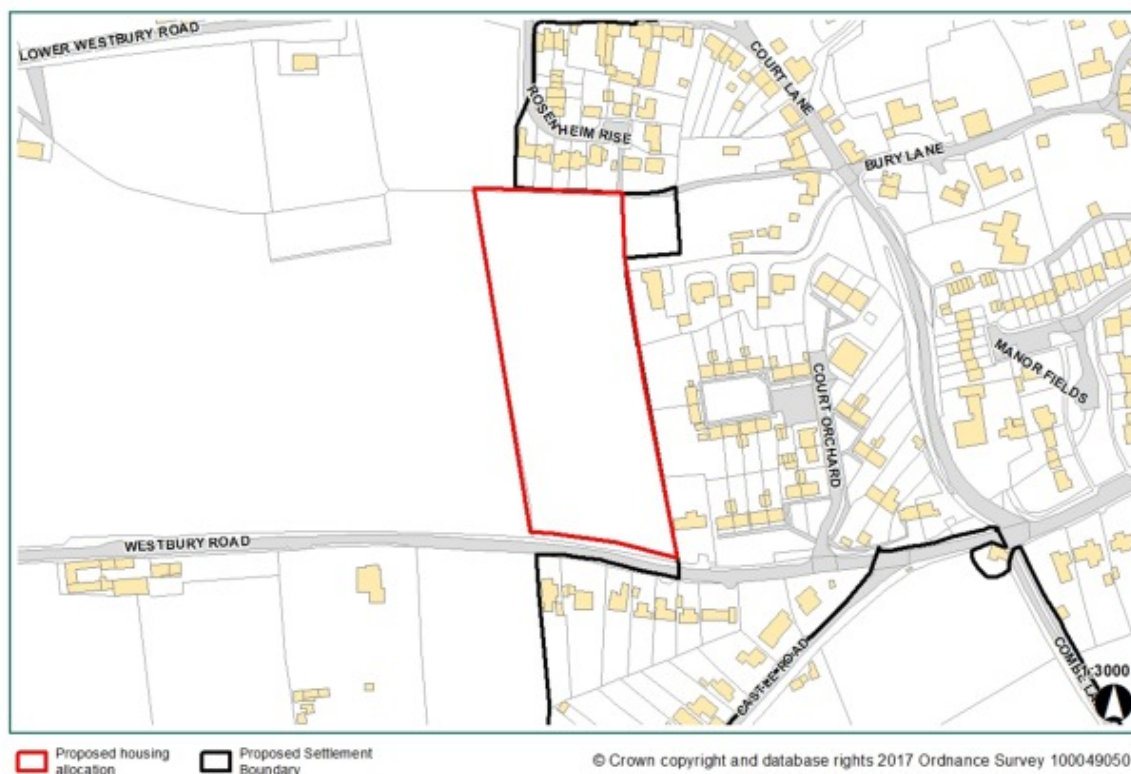
approximately 40 additional dwellings would expand the village by a relatively significant extent, but would deliver substantial benefits, including the capacity to provide a number of affordable homes.

- 5.112** Approximately 1.7ha of land at Ridgeway Farm, Crudwell is allocated for the development of approximately 50 dwellings as shown on the Policies Map. It is in a location that has the capacity to accommodate change from an environmental and landscape perspective. It would provide wider benefits for the local community by scope to provide for affordable housing and by supporting the expansion of the local primary school. The school is currently full but expansion could be possible through funding contributions toward additional capacity to cater for pupils arising from development. This would remove a particular constraint to the long term prospects of the village and support its role in the spatial strategy.
- 5.113** The site forms part of a larger field encompassing the old farm buildings. There are no field boundaries on the site's western boundary therefore a new visual boundary will need to be established. Additional screening at the site boundaries would be required to preserve and maintain the landscape's quality, particularly on the northern and eastern boundaries. This would retain views of a wooded framework in longer distance views and minimise the visibility of the development in the wider landscape. Development along Tetbury Lane should be sensitively designed to ensure it integrates with the existing semi-rural frontage and supports the distinctiveness of the village.
- 5.114** Access will be from Tetbury Lane and will require highway improvement works to the junction of Tetbury Lane/ A429 and improvements for pedestrians along Tetbury Lane and, elsewhere where feasible, in order to improve accessibility to the centre of the village. An extension of public footpath CRUD9 would be required, to the west of the Dawneys, linking with Tetbury Lane to allow for wider improvements to be delivered in relation to the local public rights of way network.

Westbury Community Area Remainder

H2.14 Court Orchard/ Cassways, Bratton

Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton



- 5.115** Bratton is designated as a Large Village where some development is acceptable to meet housing needs and to improve employment opportunities, services and facilities.
- 5.116** Approximately 1.35ha of land at Court Orchard/Cassways is allocated for the development of approximately 40 dwellings, as identified on the Policies Map.
- 5.117** The site comprises a roughly rectangular field that slopes down towards the north. The site is situated on the edge of Bratton, and is within a Special Landscape Area. A part of the site also adjoins the Bratton Conservation Area.
- 5.118** Trees and hedgerows on the sites boundaries are important wildlife corridors and have ecological importance. Consequently they should be retained, protected and where necessary, enhanced through additional planting.
- 5.119** Additional screening at the site boundaries would be required to preserve and maintain the landscape quality, Conservation Area and edge of settlement setting, and to protect the amenity of adjoining residential dwellings. A new visual boundary to the settlement will need to be established along the site's western edge and new woodland planting will be a substantial part of a scheme.
- 5.120** Part of the site is susceptible to surface water flooding and a flood risk assessment will have to pay particular regard to this and inform the design of the site.

5.121 Access would be from the B3098. Improved connections to adjoining public rights of way BRAT24 and BRAT25 should be facilitated through any subsequent development proposals.

South Wiltshire Housing Market Area

- 5.122** Land for housing development is identified to ensure supply, support the role of settlements in the South Wiltshire HMA, and improve choice and competition in the market for land. Evidence suggests a need for a greater intervention by the Plan with regard to the South Wiltshire HMA in order to ensure a continuity of land supply⁽²¹⁾.
- 5.123** As a Principal Settlement, the WCS anticipates that Salisbury will be a primary focus for development. Moreover, the role of the city as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026. Additional allocations are therefore made to support this role.
- 5.124** Other allocations are made at Durrington, a Market Town with Amesbury and Bulford, to supports its role.

Policy H3

Land is allocated for residential development at the following sites, as shown on the policies map:

Table 5.4 South Wiltshire Housing Market Area

Community Area	Reference	Site Name	No of dwellings
Salisbury	H3.1	Netherhampton Road, Salisbury	640
	H3.2	Hilltop Way	10
	H3.3	North of Netherhampton Road	100
	H3.4	Land at Rowbarrow	100
Amesbury	H3.5	Clover Lane, Durrington	45
	H3.6	Larkhill Road, Durrington	15

- 5.125** How these sites were selected is explained in the Community Area Topic Papers published alongside this Plan.
- 5.126** The specific requirements and form development will take are described below for each site to ensure they are each appropriate in scale and character to their location and in accordance with WCS and national policy.

Salisbury

- 5.127** Salisbury is designated as a Principal Settlement in the Wiltshire Core Strategy and is a strategically important centre and a primary focus for development. Significant levels of jobs and homes should be provided in Principal Settlements, together with supporting community facilities and infrastructure, to meet their economic potential and to support self-containment (Core Policy 1). The WCS envisages Salisbury, with Wilton, accommodating approximately 6,060 dwellings over the plan period (2006 to 2026).

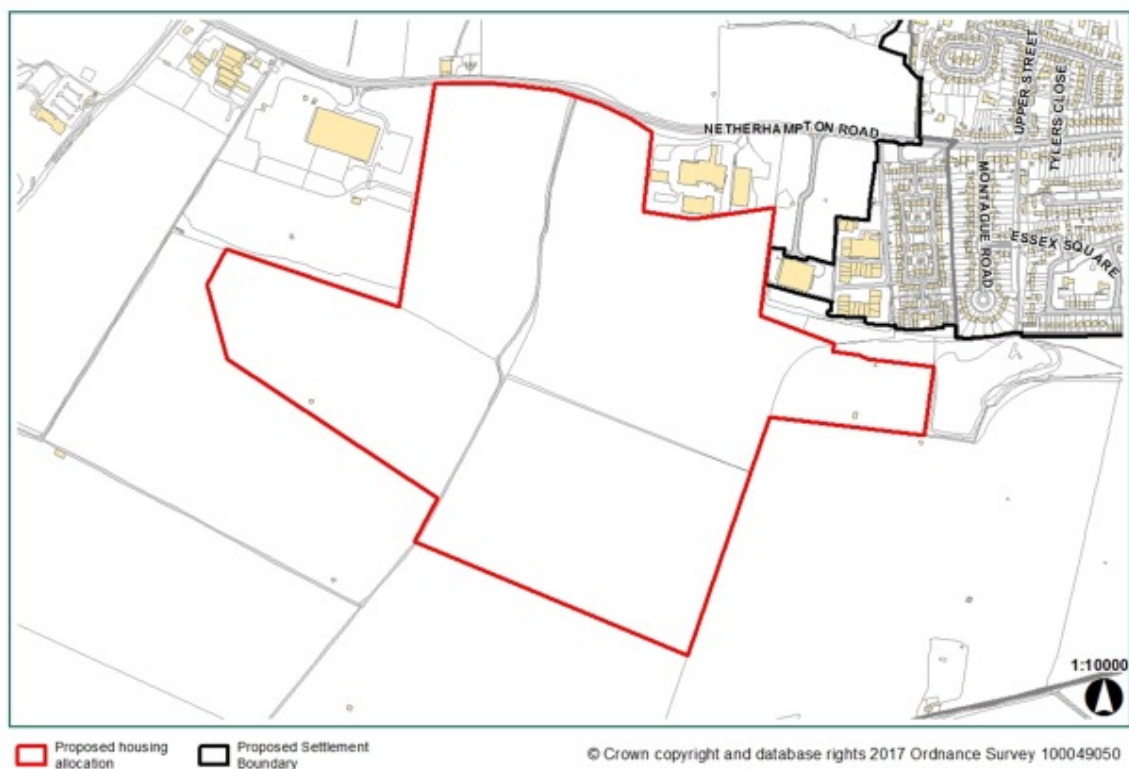
21 Topic Paper 3: Housing Land Supply, paragraph 3.26, Wiltshire Council (July 2017)

5.128 Assessment evidence demonstrates three considerations to be addressed in order for housing development to be accommodated:

- **Transport:** development inevitably has impacts on the local transport network. The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS. Plan allocations crystallise the pattern growth takes up to 2026 and refreshing the Salisbury Transport Strategy will allow the effectiveness of existing measures to be reviewed and propose new ones to accommodate growth. Development will contribute to these wider network measures, where necessary, alongside measures that are implemented expressly as part of specific development proposals.
- **Education:** development will increase the number of pupils needing primary school places. A lack of capacity across the City affects proposals allocated for development. The evidence points to the need for a new primary school. Therefore, in addition to land reserved for one new school, funding contributions will be sought from developers to help provide adequate capacity.
- **Biodiversity:** development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss / damage. However, the scale of development is within thresholds set down in a Nutrient Management Plan for the river that avoids the likelihood of adverse effects. Nevertheless, impacts are kept under review and this situation may change. Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in an annex to the Nutrient Management Plan.

H3.1 Netherhampton Road, Salisbury

Figure 5.19 H3.1 Netherhampton Road, Salisbury



Policy H3.1

Approximately 63ha of land at Netherhampton Road, as identified on the policies map, is proposed for mixed use development comprising the following elements:

- approximately 640 dwellings
- Land for employment (B1, B2 and B8 uses of the Use Classes Order)
- at least 1.8ha of land for a two form entry primary school along with playing pitches
- A local centre
- A Country Park of at least 10ha in size with associated parking and facilities

Development will be subject to the following requirements:

- Strategic landscaping and open space provision. All built development to be located below the 75m contour and a Country Park to be located in the east and south of the site
- Transport network improvements necessary to accommodate the scale of development envisaged
- Provision of sufficient school and healthcare capacity to meet the need created by the development
- Measures to safeguard the interest of Harnham Hill Chalk Pit SSSI and Harnham Slope County Wildlife Site
- Surface water management that achieves equivalent or less than current greenfield rates of run-off

Development will take place in accordance with a masterplan for the site approved by the Council.

5.129 Approximately 63ha of land to the south of Netherhampton Road, as shown on the Policies Map, is allocated for development of approximately 640 dwellings, employment land and a new two form of entry primary school and a local centre. All built development will be below the 70m contour and a scheme will include a country park and extensive planting. Development of this site represents necessary growth to support the delivery of housing at Salisbury and thereby maintain a 5 year housing land supply position within the South Wiltshire Housing Market Area.

5.130 The site was originally included in the draft South Wiltshire Core Strategy as a strategic allocation. Whilst the Examination of that plan led to the site not being allocated for development due to a reduction in housing requirements, it was nonetheless considered suitable as a strategic allocation and referenced as a potential site for consideration if, or when the need for additional housing arises. Accordingly, the site is referenced in paragraph 5.112 of the Wiltshire Core Strategy as a site that should be considered if further land is needed to meet housing requirements, and the site has now been confirmed as a preferred location for growth having been assessed through a sustainability appraisal which assessed a number of reasonable alternative sites around Salisbury.

5.131 In order to facilitate development, there is a requirement for a new primary school to be provided on site. Accordingly, a minimum of 1.8ha of land is reserved within the scheme in order to accommodate a two form entry primary school.

- 5.132** The site will include an element of employment alongside other uses. Evidence does not suggest a specific quantum of employment land. The site has a strategic role as a possible destination for the relocation of businesses to allow the redevelopment of the Churchfields strategic allocation of the WCS. A scale and form of employment would be a matter for discussion with relevant stakeholders as a part of preparing a masterplan for the site but would be delivered in the form of serviced land.
- 5.133** This location has capacity to accommodate change from an environmental and landscape perspective. There are no landscape, biodiversity or heritage designations within the site. The edge of the Cranborne Chase and West Wiltshire Downs AONB lies approximately 2km south-west of this site and no significant impacts on the AONB are considered likely. Mitigation is considered achievable to reduce any potential adverse landscape effects, including on visual connections to local landmark features e.g. Salisbury Cathedral, Old Sarum and Netherhampton Church, through significant provision of appropriately located public open space and green infrastructure, with new residential development located in the northern part of the site and restricted to below the 75m contour line. Substantial new tree planting will reflect typical Downland characteristics.
- 5.134** The site includes prehistoric barrows, field systems and enclosures and very high archaeological potential. However, the site is large and the exact extent of work is uncertain. Investigations should inform a master plan for the site and an archaeological assessment would be required to support a subsequent planning application.
- 5.135** West Harnham Chalk Pit Site of Special Scientific Interest (SSSI) and Harnham Slope County Wildlife Site (CWS) should be protected. Potential additional recreational use will be positively managed. Sufficient areas of public open space should be incorporated into a layout and design in order to protect these sites by providing attractive, alternative areas for recreation. To support this objective, a significant sized Country Park will be provided in the south and east of the site for recreational use by the public as part of open space and green infrastructure provision. Additional planting will go some way to counteract the phosphate loading and resulting pressures on the River Avon SAC that development will create. An objective of the site will be to offset fully all potential for harm.
- 5.136** Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. Accordingly, contributions towards these improvements will likely be sought. To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy. Mitigation measures will be guided by evidence from a robust and comprehensive transport assessment which will need to be undertaken by any future applicant, the scope of which is to be agreed by Wiltshire Council and Highways England. The assessment would fully investigate detailed transport impacts of the development on the wider Salisbury transport network, especially on the A36T, and identify appropriate measures to safely accommodate additional traffic emanating from the new development.
- 5.137** In addition, measures to positively promote and support cycling, walking and public transport use would also need to be addressed through any subsequent planning application process. This too would be undertaken in conjunction with an updated Salisbury Transport Strategy that takes account of planned strategic growth of Salisbury. The site is reasonably well located in relation to the city centre and development should include measures to enable as many trips as possible to the city centre to take place on foot, cycling or by public transport. The bridleway leading from the site (NHAM10) is likely to be a key route for people walking and cycling from the site connecting to the Old Shaftesbury Drove and into Harnham. Development of the site should include suitable surfacing of this route throughout the site.

- 5.138** A water infrastructure capacity appraisal will be needed to confirm the scope and extent of works to service new development. This should include the capacity of local sewer systems. A detailed flood risk assessment would be required in order to identify a set of appropriate sustainable drainage measures. Sufficient land would need to be set aside for robust surface water management, to include a comprehensive Surface Water Drainage Scheme that results in run-off rates equalling, or greater than current greenfield infiltration rates.

H3.2 Hilltop Way, Salisbury

Figure 5.20 H3.2 Hilltop Way, Salisbury

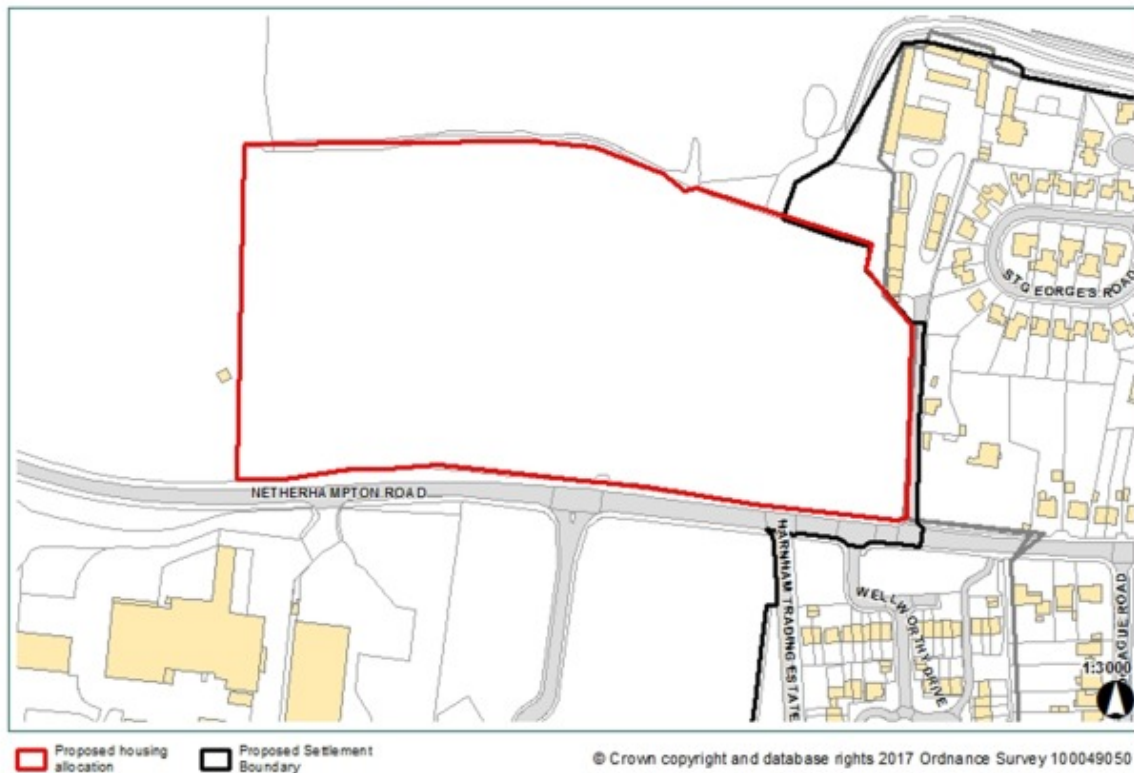


- 5.139** Hilltop Way is allocated for the development of approximately 10 dwellings on approximately 0.48ha of land as shown on the Policies Map. The site is adjacent to the existing settlement boundary of Salisbury and would deliver a relatively small number of dwellings towards the overall remaining indicative housing requirement for Salisbury.
- 5.140** The site is a narrow area of undeveloped rough grassland adjacent to existing residential development along Hilltop Way. Access to the site would be achieved via Hilltop Way. There is a public right of way forming the northern boundary of the site and beyond that is the Hampton Country Park. The right of way should be maintained and its route enhanced through additional hedge and tree planting and additional access points to the Country Park.
- 5.141** The site has been shown to have a high population of reptiles (Slow Worms) and these will need to be re-colonised on a suitable receptor site within the Country Park. It will be important to demonstrate that the mitigation proposals are consistent with Laverstock and Ford Parish Council's wider aims for the Country Park.

- 5.142** There is potential for impacts on skyline views from Old Sarum Airfield Conservation Area and from Old Sarum Castle and these will need to be mitigated through the appropriate location of new dwellings and a high quality design scheme, together with suitable landscaping and provision of open space.

H3.3 North of Netherhampton Road, Salisbury

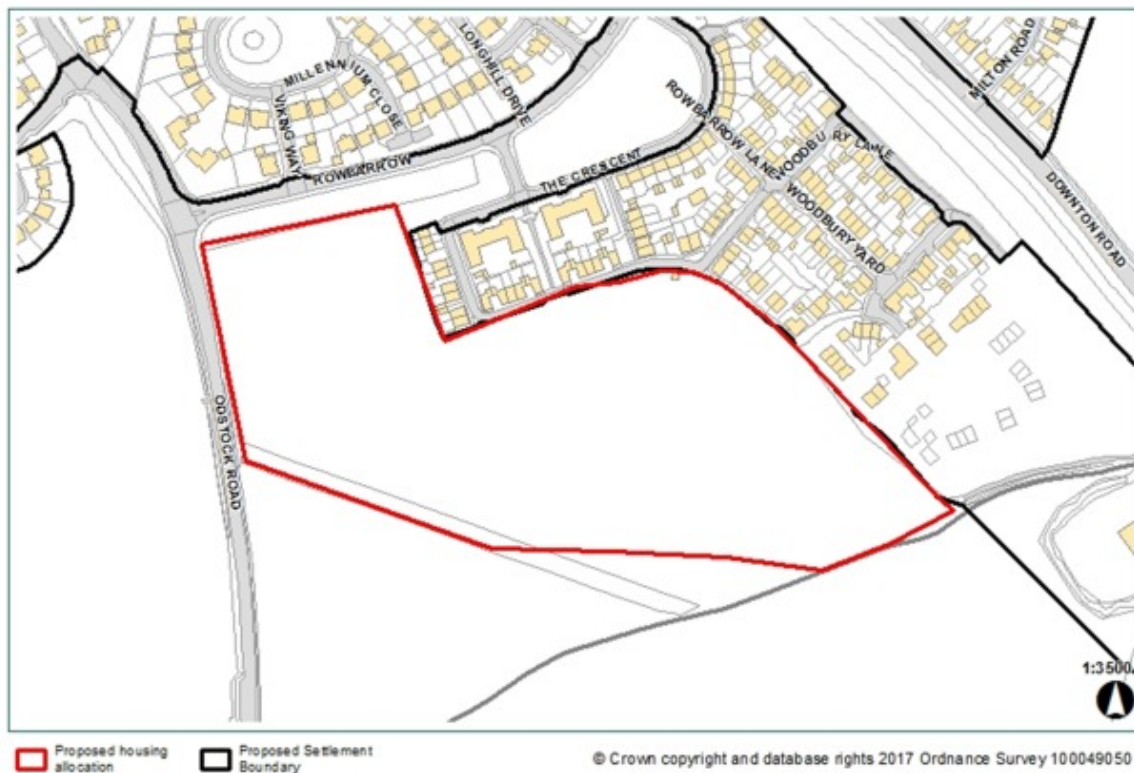
Figure 5.21 H3.3 North of Netherhampton Road, Salisbury



- 5.143** Land North of Netherhampton Road is allocated for the development of approximately 100 dwellings on 5.6ha of land as shown on the Policies Map. It is reasonably well located with regard to services and facilities. The site is relatively well contained in terms of visual impacts on the wider landscape. The extent of possible flood risks areas will need to be carefully surveyed so that development avoids them. A detailed flood risk assessment would be required in order to identify a set of appropriate sustainable drainage measures.
- 5.144** The area is sensitive in terms of the setting to the Cathedral and views towards it. Open space along the southern boundary will maintain views of the Cathedral spire travelling east. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Proposals would need to provide for a high quality, sustainable development that enhances an important approach to the City and provides links to nearby public rights of way.
- 5.145** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. A new primary school on land south of Netherhampton Road would contribute to the new school places needed to serve the area. Funding contributions may also be sought where needed to increase capacity at local GP surgeries in the city.

H3.4 Land at Rowbarrow, Salisbury

Figure 5.22 H3.4 Land at Rowbarrow, Salisbury



- 5.146** Land at Rowbarrow is allocated for the development of approximately 100 dwellings on 6.1ha of land as shown on the Policies Map. The development of the site would provide housing in a location with a reasonable level of access to the local services and facilities in Salisbury city centre but not within walking distance. There is however a frequent bus service within 100m of the site and the Park & Ride is in close proximity
- 5.147** Development will need to preserve the contribution made by the site to the setting and therefore to the importance of the Woodbury Ancient Villages Scheduled Monument. If necessary land will need to be set aside from development. Detailed design and layout will be guided by Heritage Impact Assessment. Scheduled monument consent will be required. The site also has high archaeological potential.
- 5.148** This is a sloping and quite prominent site. In combination with Heritage Impact Assessment, development will need to take place within a strong landscape framework that maintains and enhances the existing woodland belts affecting the site. Containment provided by the beech shelterbelt on the southern boundary should extend as a green corridor from the end of the shelterbelt eastwards towards the existing Rowbarrow housing development and woodland around the Milk & More Salisbury Depot. This would provide a setting for rights of way in the area and maintain their views of the Salisbury Cathedral spire.
- 5.149** In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. A new primary school on land south of Netherhampton Road would contribute to the new school places needed to serve the area. Funding contributions may also contribute to improving the existing primary schools at Harnham. In addition, contributions may also be sought where needed to increase capacity at local GP surgeries in the city.

Amesbury, Bulford and Durrington

- 5.150** The Wiltshire Core Strategy designates Durrington in conjunction with Bulford and Amesbury, as a Market Town. The WCS envisages accommodating approximately 2,440 dwellings over the plan period (2006 to 2026). The settlement strategy identifies a series of priorities including increasing jobs and homes to a moderate and proportionate extent. Development would also help to enhance services and facilities and promote better levels of self-containment, particularly at Durrington and Bulford. Provision of housing at Durrington would positively contribute towards the delivery of this objective by ensuring the viability of existing services and creating demand for an improved local offer.
- 5.151** The area has a high archaeological potential and assessment would be required to support planning applications for each of the sites proposed and this should also include avoiding harm to the outstanding universal value of the Stonehenge and Avebury World Heritage Site.
- 5.152** Upgrades to the local water supply network may be required to accommodate further growth at Durrington, pending a review of local abstraction licences due to be completed in 2019. It is possible that such upgrades may need to be completed before development at the following sites can commence.

H3.5 Clover Lane, Durrington

Figure 5.23 H3.5 Clover Lane, Durrington



- 5.153** Approximately 1.8ha of land to the north of Clover Lane, Durrington is allocated for the development of approximately 45 dwellings, as identified on the Policies Map. The central portion of the site has planning permission already and could accommodate approximately 15 dwellings. Land for a further 30 dwellings is allocated for development on two parcels of land to the east and west of this central portion.

- 5.154** Vehicular access would be from the existing residential road network using Clover Lane. Pedestrian and cycle permeability through the site must be incorporated in the layout, including a direct link for pedestrian and cycle access through to the High St.
- 5.155** The site lies adjacent to the Durrington Conservation Area to the east and a number of Listed Buildings. Detailed design and layout would need to preserve or enhance the character of the Conservation Area and this is particularly important for the eastern portion of the site. Development should minimise the potential for harm to the significance of Listed Buildings and the Conservation Area. Informed by a Heritage Impact Assessment these considerations should be resolved through the detailed design and layout of a scheme.
- 5.156** There is a tree belt adjacent to the northern boundary of the site which is protected by a group Tree Preservation Order and there are substantial hedgerows to the western boundaries. Mature trees and hedgerows must be retained as important features of the site, and additional green infrastructure should be incorporated to enhance and protect these features in order to ensure a soft edge to the open countryside. A layout can link into open space to the south east of the site.

H3.6 Larkhill Road, Durrington

Figure 5.24 H3.6 Larkhill Road, Durrington



- 5.157** Approximately 0.8ha of land to the south of Larkhill Road, Durrington is allocated for the development of approximately 15 dwellings, as illustrated on the Policies Map. The land forms the northern part of a field which slopes down towards the River Avon at the southern edge of Durrington.

- 5.158** The form of development should replicate the character and pattern of frontage development characteristic of Larkhill Road. Development as result will be limited and to a relatively low density. In order to soften the edge to the open countryside, the southern edge of the site should consist of gardens or open space with boundaries that are relatively open.

6. Settlement boundary review

Introduction

- 6.1** The Council did not review the extent of the boundaries to inform the WCS and instead relied upon the former district local plans. They are reviewed as a part of preparing the Plan with the Plan Objective:
- To ensure there is a clear definition to the extent of the built up areas at Principal Settlements, Market Towns, Local Service Centres and Large Villages
- 6.2** The Plan applies one consistent methodology for the County to replace the slightly different ways used by the previous District Councils. The Council has developed this methodology in consultation with Parish and Town Councils. The process is explained in detail in Topic Paper 1: Settlement Boundary Review Methodology.
- 6.3** A comprehensive review of the boundaries ensures they are up-to-date and adequately reflect changes that have happened since they were first established. The Plan amends settlement boundaries where necessary⁽²²⁾.
- 6.4** It is also the prerogative of local communities to review Settlement Boundaries through neighbourhood planning. Neighbourhood Plans are required to be in general conformity with the WCS. Paragraphs 4.13 and 4.15 of the WCS support the review of settlement boundaries through the Plan or through neighbourhood plans. Therefore, where a neighbourhood plan has been considered to have reviewed the settlement boundary and is at a sufficiently advanced stage, then it is unnecessary to duplicate this work by reviewing the relevant settlement boundary in the Plan.
- 6.5** Neighbourhood plans were considered to have reviewed their settlement boundaries where the issue has been explicitly addressed through the neighbourhood plan process, even if the eventual outcome is to retain the existing settlement boundary. Generally, when a neighbourhood plan submitted to the Council has reviewed a settlement boundary and proposes amendments, the Plan has not carried out a second review of the boundaries. Individual community area topic papers identify those settlements where the settlement boundary has been reviewed by a sufficiently advanced neighbourhood plan.
- 6.6** However, for settlements where the neighbourhood plan is not considered to have reviewed their boundary, or where there is no neighbourhood plan or one at an early stage, then the settlement boundary has been reviewed through the Plan.
- 6.7** Neighbourhood plans submitted subsequently will still be able to consider their own settlement boundary through the neighbourhood planning process. Once a future neighbourhood plan is 'made', its settlement boundaries will then supersede those in the Plan.

Amended Settlement Boundaries

- 6.8** The Plan makes amendments to the following settlement boundaries:

22 Settlement boundaries have been updated to take account of implemented planning permissions since April 2016

East Wiltshire HMA: Amended Settlement Boundaries

Table 6.1 East Wiltshire HMA: Amended Settlement Boundaries

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
Devizes⁽²³⁾		
	Devizes	Potterne
	Bromham	Urchfont
	Market Lavington	
	Rowde	
	West Lavington and Littleton Panell	
	Worton	
Marlborough		
	Aldbourne	
	Baydon	
	Broad Hinton	
	Marlborough	
	Ramsbury	
Tidworth		
	Collingbourne Ducis	
	Ludgershall	
	Netheravon	
	Tidworth	
Pewsey		
	Burbage	Pewsey
	Great Bedwyn	
	Shalbourne	
	Upavon	

23 Devizes has a made Neighbourhood Plan which is considered to review its settlement boundary. The Devizes Neighbourhood Plan had the intention of including its site allocations within its settlement boundary however one allocation was omitted in error. Wiltshire Council have not conducted a wholesale review of the settlement boundary of Devizes however it does include the site omitted from the boundary in error in the Neighbourhood Plan.

North and West Wiltshire HMA: Amended Settlement Boundaries

Table 6.2 North and West Wiltshire HMA: Amended Settlement Boundaries

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
Bradford on Avon		
	Westwood	Bradford on Avon
	Winsley	Holt
Calne		
	Calne	
	Studley and Derry Hill	
Chippenham⁽²⁴⁾		
	Christian Malford	
	Hullavington	
	Kington St Michael	
	Sutton Benger	
	Yatton Keynell	
Corsham		
	Box	
	Colerne	
	Corsham	
	Rudloe	
Malmesbury		
	Malmesbury	Great Somerford
	Ashton Keynes	
	Crudwell	
	Oaksey	
	Sherston	
Melksham		
	Atworth	

24 The settlement boundary for the town of Chippenham has been reviewed by the Chippenham Site Allocations Plan.

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
	Melksham	
	Seend	
	Semington	
	Shaw and Whitley	
	Steeple Ashton	
Royal Wootton Bassett and Cricklade		
	Cricklade	
	Lyneham	
	Purton	
	Royal Wootton Bassett	
Trowbridge		
	Hilperton	
	North Bradley	
	Southwick	
	Trowbridge	
Warminster		
	Chapmanslade	
	Codford	
	Corsley	
	Heytesbury	
	Sutton Veny	
	Warminster	
Westbury		
	Bratton	
	Dilton Marsh	
	Westbury	

South Wiltshire HMA: Amended Settlement Boundaries

Table 6.3 South Wiltshire HMA: Amended Settlement Boundaries

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
Amesbury		
	Amesbury	Porton (Idmiston NP)
	Bulford	
	Durrington	
	Great Wishford	
	Shrewton	
	The Winterbournes	
	Tilshead	
Mere		
	Mere	
Salisbury		
	Salisbury	
Southern Wiltshire		
	Alderbury	
	Combe Bissett	
	Downton	
	Morgan Vale and Woodfalls	
	Pitton	
	Whiteparish	
	Winterslow	
Tisbury		
	Fovant	
	Hindon	
	Ludwell	
	Tisbury	
Wilton		

Community Area	Settlement Boundaries reviewed by the Wiltshire Housing Site Allocations Plan	Settlement Boundaries not reviewed because of Neighbourhood Plans
	Broad Chalke	
	Dinton	
	Wilton	

- 6.9** Previous and amended boundaries are shown for settlements in each HMA in Appendix A. Plans in Community Area Topic Papers have each map accompanied by a table of changes from the current adopted boundary.

7. Implementation and monitoring

- 7.1** The Plan is designed to be flexible and contain appropriate levels of contingency, so that it can effectively respond to events if necessary. However, it will be essential to monitor the effectiveness of the strategy, so that action can be taken to address any issues which may arise. This monitoring will be done through the following mechanisms
- 7.2** Central to monitoring the effectiveness of the plan will be the use of Housing Trajectories. One of the two purposes of the plan is to maintain a five year land supply in each of Wiltshire's Housing Market Area (HMA). Therefore monitoring the delivery of houses is critical. Basically a housing trajectory is a graph which plots the expected rate of housing delivery over a plan period and then may be used to overlay actual delivery so that the success of the policies can be evaluated.
- 7.3** As advised in Planning Policy Guidance, housing trajectories are an important tool for monitoring housing delivery. In line with this guidance, Wiltshire Council will carry out an annual assessment in a robust and timely fashion, based on up-to-date and sound evidence, taking into account the anticipated trajectory of housing delivery, and consideration of associated risks, and an assessment of the local delivery record. The assessment will be realistic and made publicly available in an accessible format.
- 7.4** By taking a thorough approach on an annual basis, the Council will be in a strong position to demonstrate a robust five year supply of sites. Demonstration of a five year supply is a key material consideration when determining housing applications and appeals. As set out in the NPPF⁽²⁵⁾, a five year supply is also central to demonstrating that relevant policies for the supply of housing are up-to-date in applying the presumption in favour of sustainable development.
- 7.5** There are four main components of the monitoring framework.

Wiltshire Monitoring Framework

- 7.6** The Wiltshire Monitoring Framework⁽²⁶⁾ was published alongside the WCS, and will also be used to check on the effectiveness of the policies within this document. The Monitoring Framework will be used to ask whether the policy is working, whether it is delivering the homes, which is the underlying objective of the policy, and what the significant effects of this are. It sets out objectives and targets for each policy, and identifies the indicators which will be used to assess progress against these. The Wiltshire Monitoring Framework will ensure that the Core Strategy is steered by a continuous process of 'plan, monitor, manage'.

Annual Monitoring Report

- 7.7** An annual report will be prepared to analyse the impacts of the Core Policies of the WCS, and assess progress against the targets identified in the Wiltshire Monitoring Framework. This Annual Monitoring Report (AMR) will include monitoring of the proposals in the Plan and also information relating to the Infrastructure Delivery Plan (IDP) and the Sustainability Appraisal (SA). Actions required to address policy performance against the Plan Objectives will then be reconsidered

25 NPPF, paragraph 11, DCLG (Mar 2012)

26 <http://www.wiltshire.gov.uk/wiltshire-local-plan-monitoring-framework-feb-2012.pdf>

Housing Land Supply

- 7.8** In line with National Policy / Guidance, the council monitors the number of new homes built each year, homes currently under construction and those that are expected to be built in the future. This evidence is set out in the 'Housing Land Availability Report'⁽²⁷⁾ and 'Housing Land Supply Statement'⁽²⁸⁾ the latter used to present the Council's 5-year housing land supply position. The proposals set out within the Plan (along with the proposals in the adopted Core Strategy and Chippenham Site Allocations Plan are intrinsically linked to the maintenance of the supply position and hence will need to be monitored to ensure timely delivery. In order to assist the monitoring process, developers / landowners will be asked to provide the Council with detailed site delivery trajectories.
- 7.9** In addition to the monitoring of the Plan's performance, the Council is also obliged to monitor housing delivery from neighbourhood plans and 'windfall' sites in line with the advice set out in the Planning Practice Guidance.
- 7.10** Further, national policy requires Local Planning Authorities to produce plans that meet the tests of soundness, which include that plans are 'positively prepared'⁽²⁹⁾. This necessitates a proactive approach to identifying and allocating sites to ensure the housing requirements can be met, rather than awaiting anticipated delivery from windfall sites. The Plan proposals ensure that there is no reliance on windfall to provide the minimum housing requirements of each HMA. That is, the Plan does what it was designed to do, which is to maintain surety of supply throughout the plan period prescribed by the WCS (Objective 2).

Management of risk – a risk register

- 7.11** A part of monitoring the effectiveness of the Plan will be to maintain a risk register. It will be used to manage risks by identifying them as they arise, evaluating their severity and identifying measures to treat them through appropriate mitigation measures that are either preventative or contingencies.

27 <http://www.wiltshire.gov.uk/housingland-availability-report-2016-doc.pdf>

28 <http://www.wiltshire.gov.uk/housingland-supply-statement-march--update.pdf>

29 NPPF, paragraph 182, DCLG (Mar 2012)

Appendix A: Amended settlement boundaries

East Wiltshire Housing Market Area

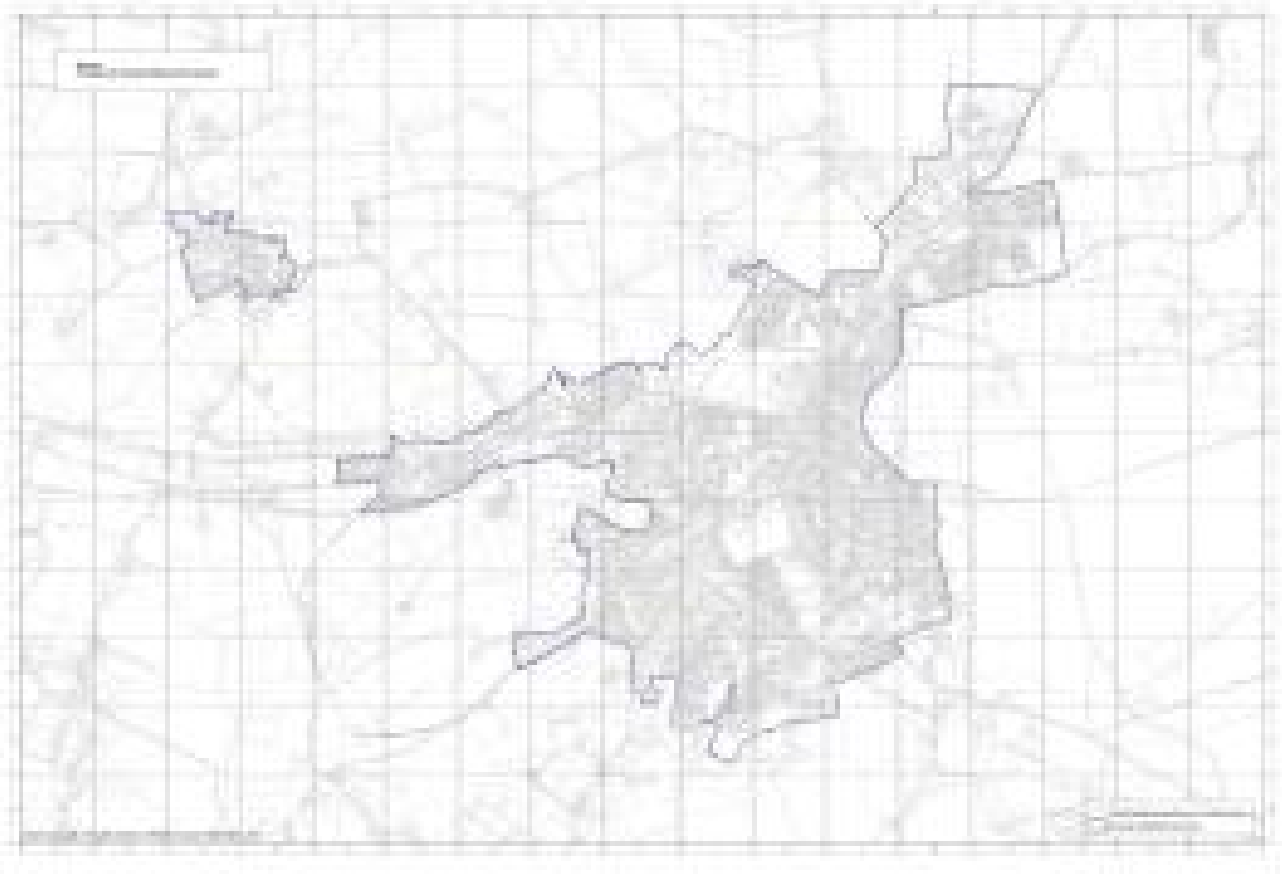
Devizes Community Area

- A.1** The following settlement boundaries in the Devizes Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:
- Devizes (see below)
 - Bromham
 - Market Lavington
 - Rowde
 - West Lavington and Littleton Panell, and
 - Worton
- A.2** Devizes has a made Neighbourhood Plan which has reviewed its settlement boundary. The Devizes Neighbourhood Plan had the intention of including its site allocations within its settlement boundary however one allocation was omitted in error. Wiltshire Council has not conducted a wholesale review of the settlement boundary of Devizes however it does include the site omitted from the boundary in error in the Neighbourhood Plan.
- A.3** The settlement boundaries for Potterne and Urchfont have not been reviewed because of neighbourhood plans.

Devizes

- A.4** *Figure A.1 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Devizes. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.1 Proposed amendments to the settlement boundary for Devizes



Bromham

- A.5** *Figure A.2 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Bromham. Click on the 'Popup full image' link in the caption to see a high resolution image.*

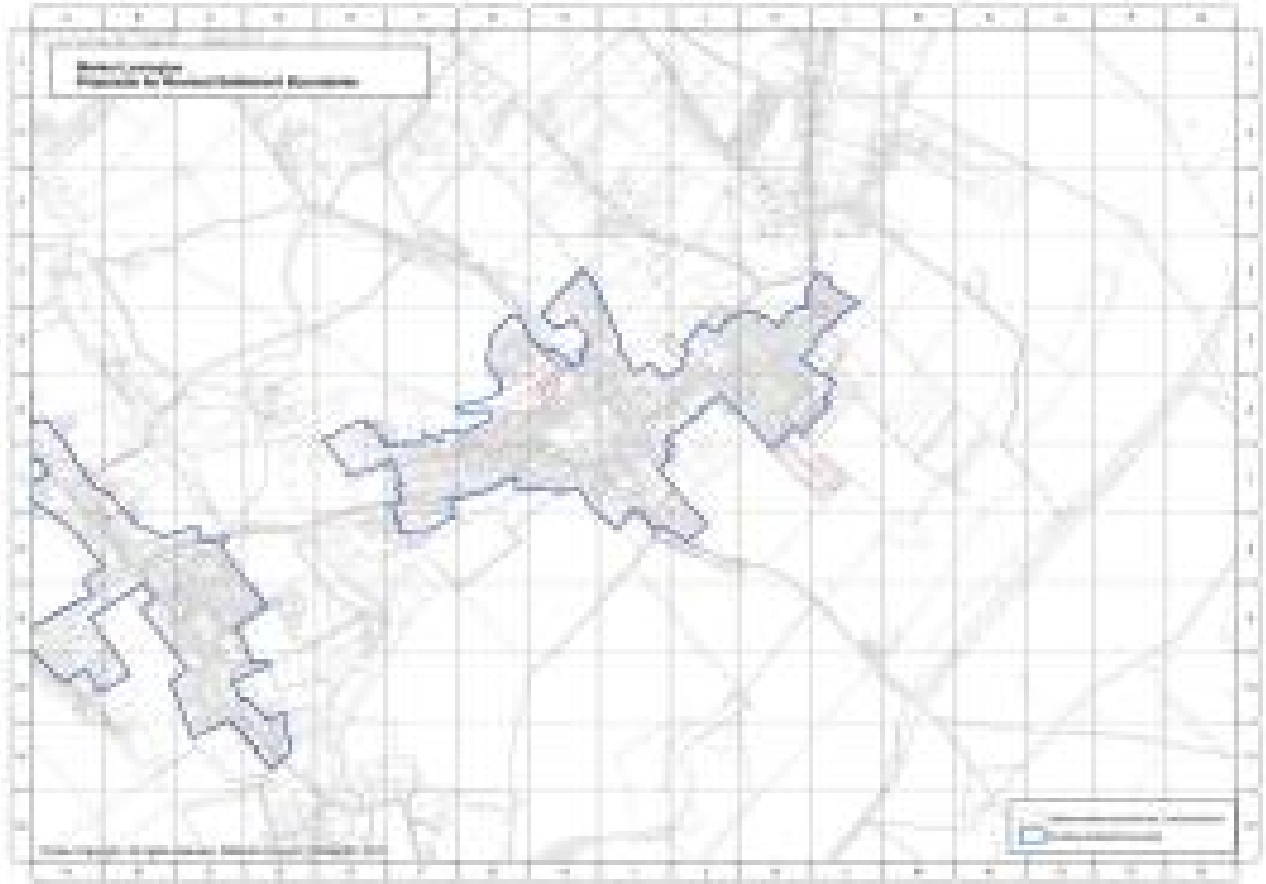
Figure A.2 Proposed amendments to the settlement boundary for Bromham



Market Lavington

- A.6** *Figure A.3 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Market Lavington. Click on the 'Popup full image' link in the caption to see a high resolution image.*

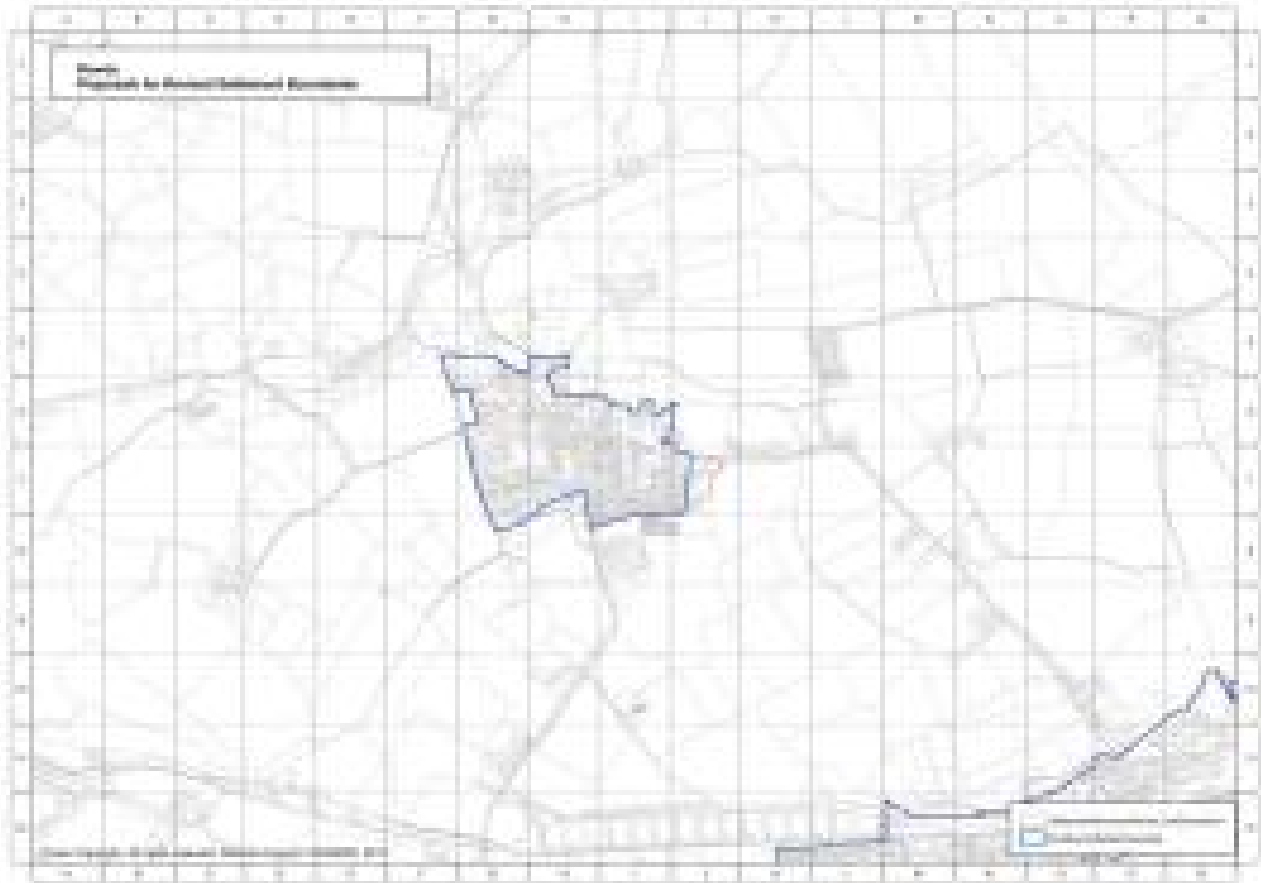
Figure A.3 Proposed amendments to the settlement boundary for Market Lavington



Rowde

- A.7** *Figure A.4 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Rowde. Click on the 'Popup full image' link in the caption to see a high resolution image.*

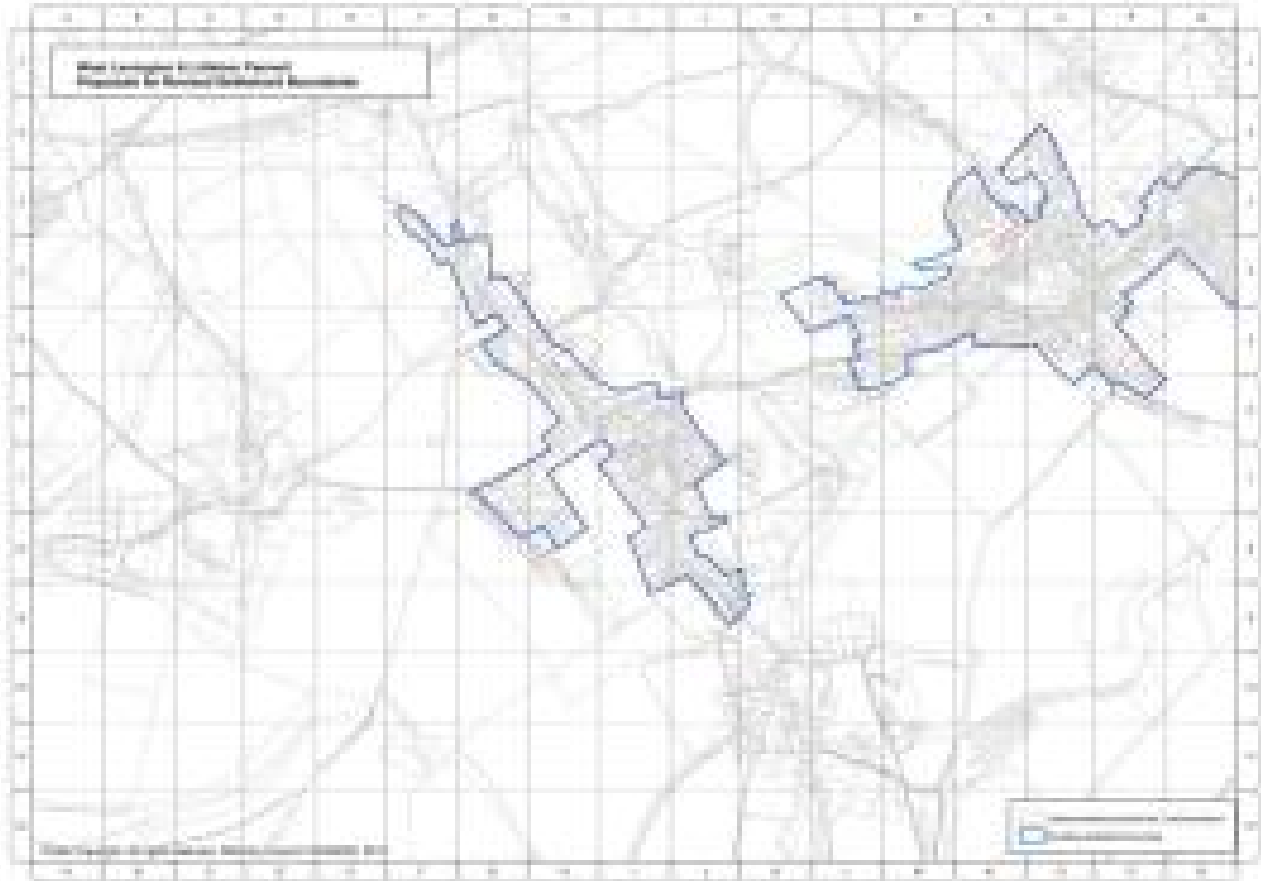
Figure A.4 Proposed amendments to the settlement boundary for Rowde



West Lavington and Littleton Panell

A.8 *Figure A.5 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for West Lavington and Littleton Panell. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.5 Proposed amendments to the settlement boundary for West Lavington and Littleton Panell



Worton

- A.9** *Figure A.6 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Worton. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.6 Proposed amendments to the settlement boundary for Worton



Marlborough Community Area

A.10 The following settlement boundaries in the Marlborough Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Marlborough
- Aldbourne
- Baydon
- Broad Hinton, and
- Ramsbury

Marlborough

- A.11** *Figure A.7 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Marlborough. Click on the 'Popup full image' link in the caption to see a high resolution image.*

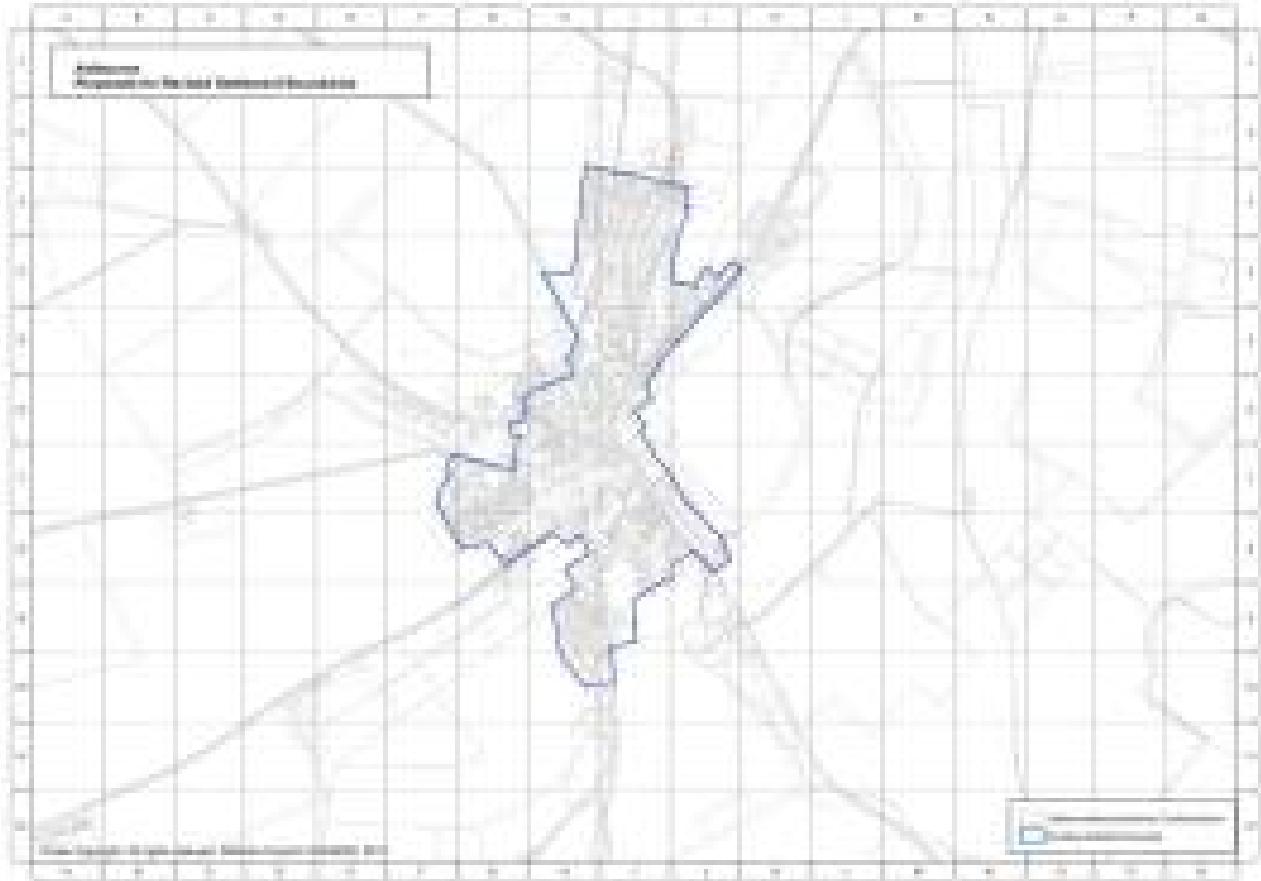
Figure A.7 Proposed amendments to the settlement boundary for Marlborough



Aldbourne

A.12 *Figure A.8 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Aldbourn. Click on the 'Popup full image' link in the caption to see a high resolution image.*

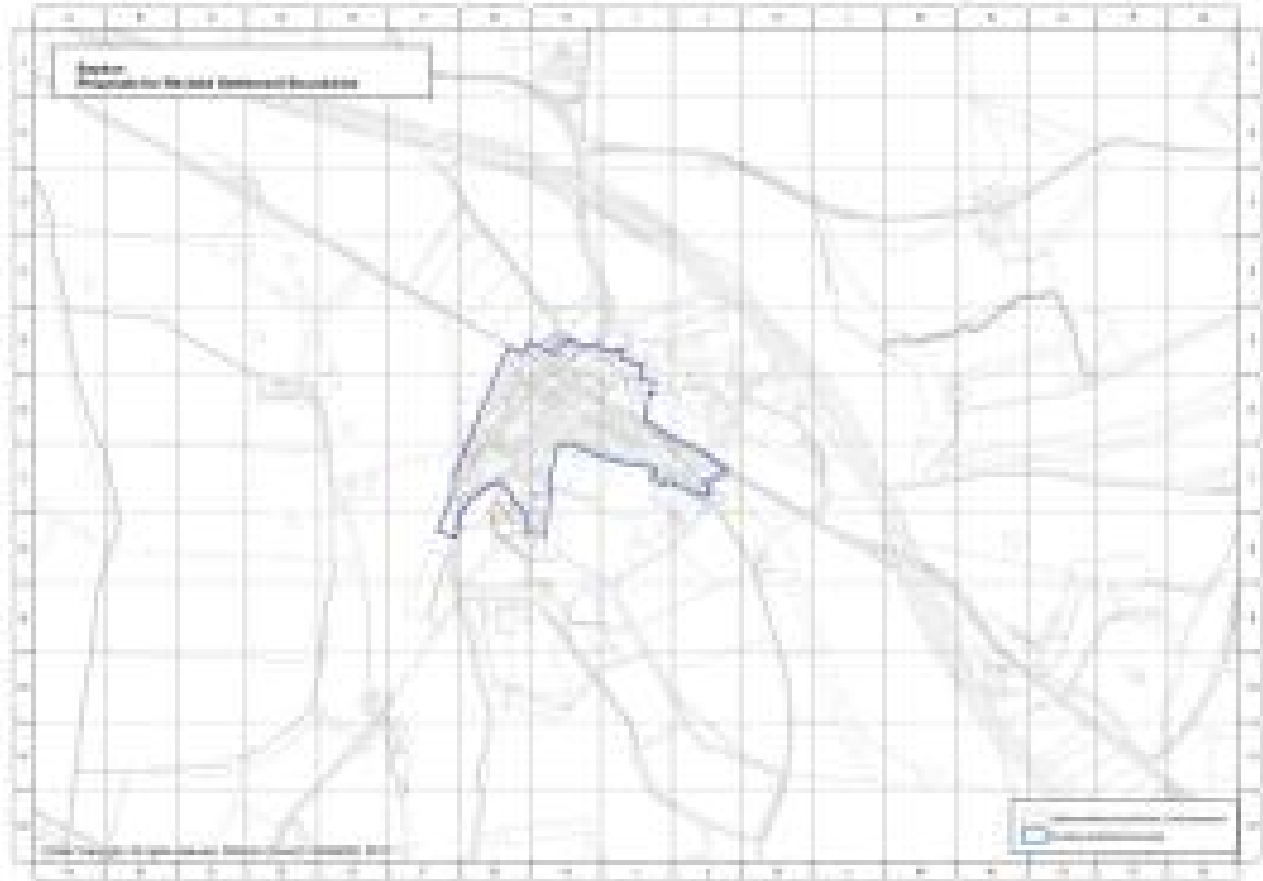
Figure A.8 Proposed amendments to the settlement boundary for Aldbourn



Baydon

- A.13** *Figure A.9 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Baydon. Click on the 'Popup full image' link in the caption to see a high resolution image.*

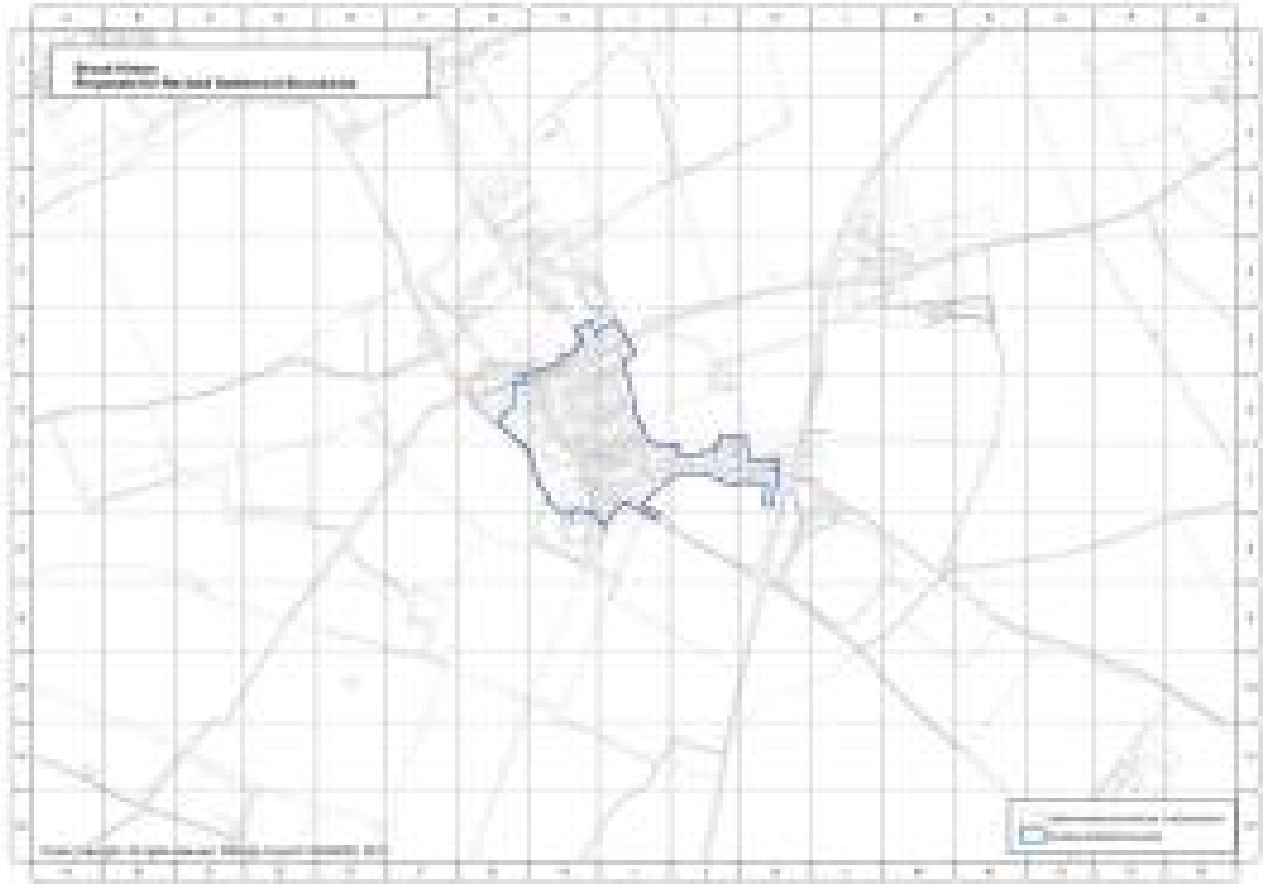
Figure A.9 Proposed amendments to the settlement boundary for Baydon



Broad Hinton

- A.14** *Figure A.10* below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Broad Hinton. Click on the 'Popup full image' link in the caption to see a high resolution image.

Figure A.10 Proposed amendments to the settlement boundary for Broad Hinton



Ramsbury

- A.15** *Figure A.11 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Ramsbury. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.11 Proposed amendments to the settlement boundary for Ramsbury



Tidworth Community Area

A.16 The following settlement boundaries in the Tidworth Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Tidworth
- Collingbourne Ducis
- Ludgershall, and
- Netheravon

Tidworth

A.17 *Figure A.12 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Tidworth. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.12 Proposed amendments to the settlement boundary for Tidworth



Collingbourne Ducis

A.18 *Figure A.13 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Collingbourne Ducis. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.13 Proposed amendments to the settlement boundary for Collingbourne Ducis



Ludgershall

- A.19** *Figure A.14 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Ludgershall. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.14 Proposed amendments to the settlement boundary for Ludgershall



Netheravon

A.20 *Figure A.15 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Netheravon. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.15 Proposed amendments to the settlement boundary for Netheravon



Pewsey Community Area

A.21 The following settlement boundaries in the Pewsey Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Burbage
- Great Bedwyn
- Shalbourne, and
- Upavon

A.22 The settlement boundary for Pewsey has not been reviewed because of a neighbourhood plan.

Burbage

A.23 *Figure A.16 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Burbage. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.16 Proposed amendments to the settlement boundary for Burbage



Great Bedwyn

- A.24** *Figure A.17 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Great Bedwyn. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.17 Proposed amendments to the settlement boundary for Great Bedwyn



Shalbourne

A.25 *Figure A.18 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Shalbourne. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.18 Proposed amendments to the settlement boundary for Shalbourne



Upavon

A.26 *Figure A.19 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Upavon. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.19 Proposed amendments to the settlement boundary for Upavon



North and West Wiltshire Housing Market Area

Bradford on Avon Community Area

A.27 The following settlement boundaries in the Bradford on Avon Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Westwood, and
- Winsley

A.28 The settlement boundaries for Bradford on Avon and Holt have not been reviewed because of neighbourhood plans.

Westwood

A.29 *Figure A.20 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Westwood. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.20 Proposed amendments to the settlement boundary for Westwood



Winsley

A.30 *Figure A.21 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Winsley. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.21 Proposed amendments to the settlement boundary for Winsley



Calne Community Area

A.31 The following settlement boundaries in the Calne Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Calne, and
- Studley and Derry Hill

Calne

A.32 *Figure A.22 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Calne. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.22 Proposed amendments to the settlement boundary for Calne



Studley and Derry Hill

A.33 *Figure A.23 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Studley and Derry Hill. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.23 Proposed amendments to the settlement boundary for Studley and Derry Hill



Chippenham Community Area Remainder

A.34 The following settlement boundaries in the Chippenham Community Area Remainder have been reviewed by the Wiltshire Housing Site Allocations Plan:

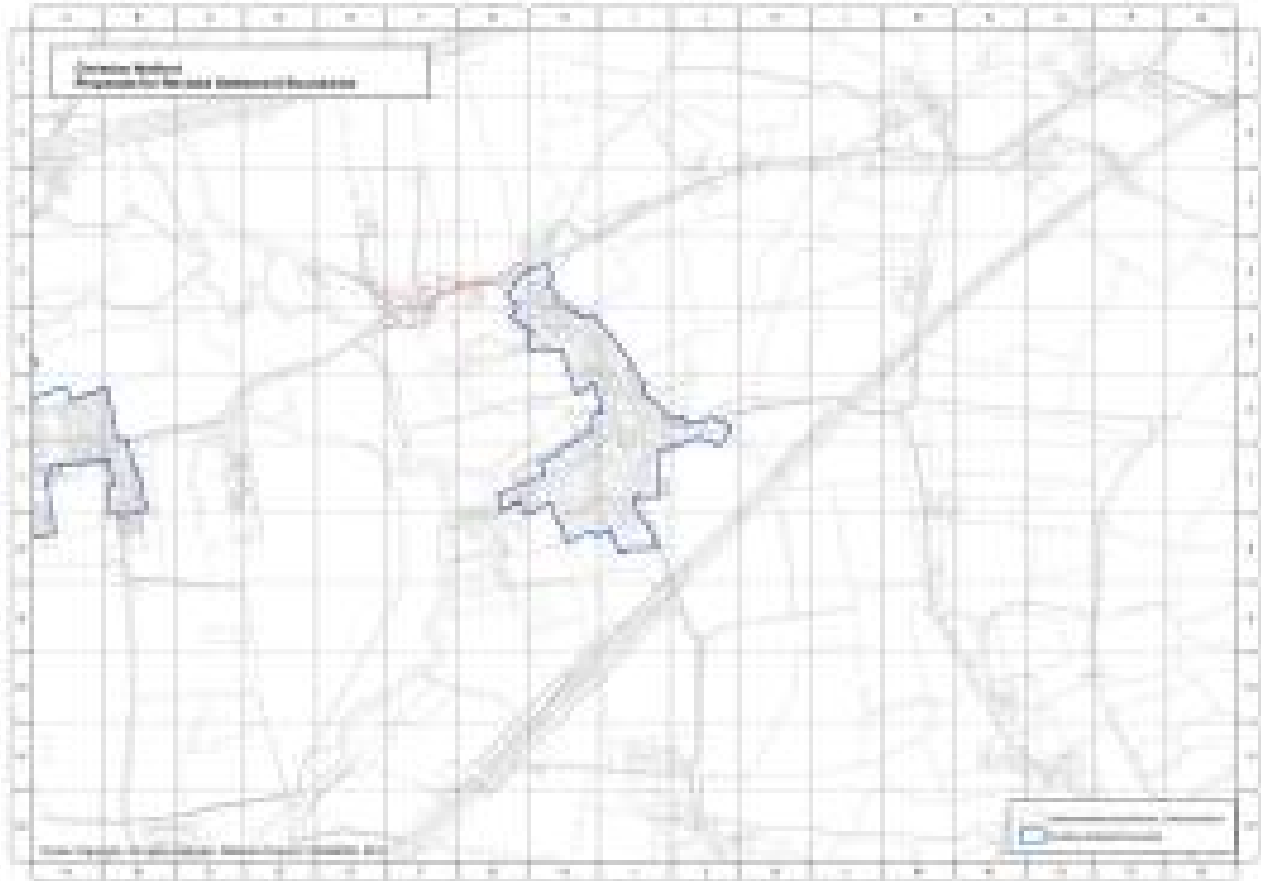
- Christian Malford
- Hullavington
- Kington St Michael
- Sutton Benger, and
- Yatton Keynell

A.35 The settlement boundary for the town of Chippenham has been reviewed by the Chippenham Site Allocations Plan.

Christian Malford

A.36 *Figure A.24 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Christian Malford. Click on the 'Popup full image' link in the caption to see a high resolution image.*

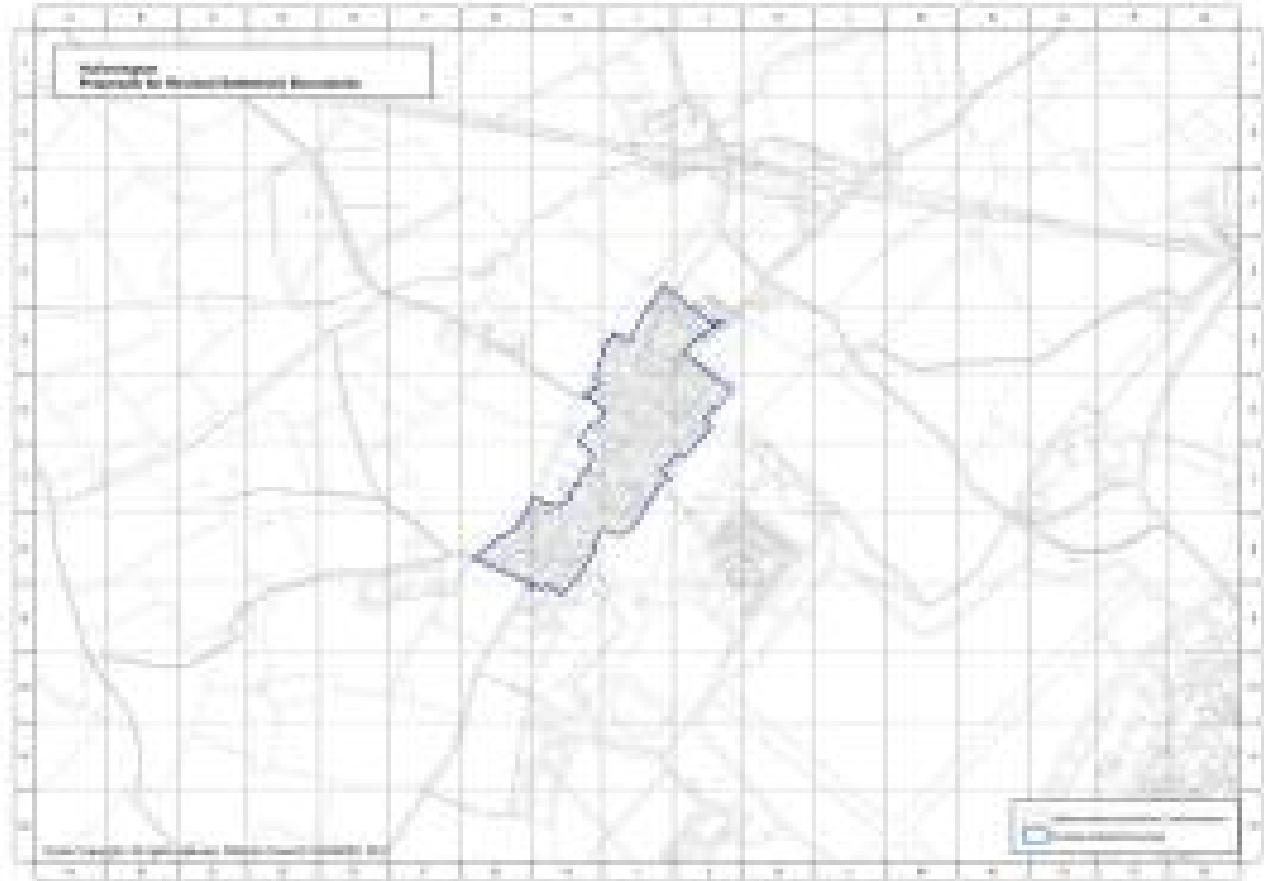
Figure A.24 Proposed amendments to the settlement boundary for Christian Malford



Hullavington

A.37 *Figure A.25 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Hullavington. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.25 Proposed amendments to the settlement boundary for Hullavington



Kington St Michael

A.38 *Figure A.26 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Kington St Michael. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.26 Proposed amendments to the settlement boundary for Kington St Michael



Sutton Benger

A.39 *Figure A.27 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Sutton Benger. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.27 Proposed amendments to the settlement boundary for Sutton Benger



Yatton Keynell

A.40 *Figure A.28 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Yatton Keynell. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.28 Proposed amendments to the settlement boundary for Yatton Keynell



Corsham Community Area

A.41 The following settlement boundaries in the Corsham Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Corsham
- Box
- Colerne, and
- Rudloe

Corsham

A.42 *Figure A.29 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Corsham. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.29 Proposed amendments to the settlement boundary for Corsham



Box

A.43 *Figure A.30 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Box. Click on the 'Popup full image' link in the caption to see a high resolution image.*

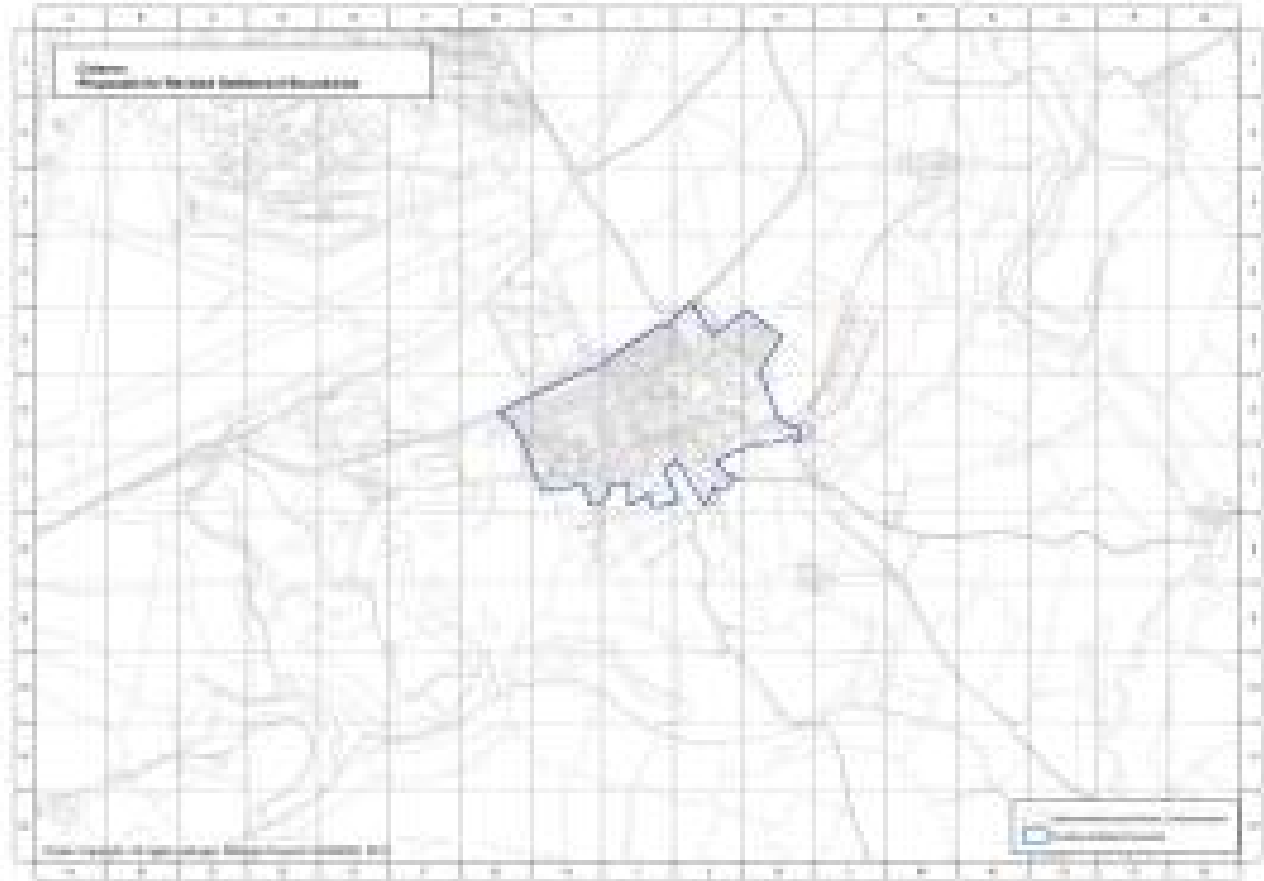
Figure A.30 Proposed amendments to the settlement boundary for Box



Colerne

- A.44** *Figure A.31 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Colerne. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.31 Proposed amendments to the settlement boundary for Colerne



Rudloe

- A.45** *Figure A.32 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Rudloe. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.32 Proposed amendments to the settlement boundary for Rudloe



Malmesbury Community Area

A.46 The following settlement boundaries in the Malmesbury Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Malmesbury
- Ashton Keynes
- Crudwell
- Oaksey, and
- Sherston

A.47 The settlement boundary for Great Somerford has not been reviewed because of a neighbourhood plan.

Malmesbury

- A.48** *Figure A.33 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Malmesbury. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.33 Proposed amendments to the settlement boundary for Malmesbury



Ashton Keynes

A.49 *Figure A.34* below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Ashton Keynes. Click on the 'Popup full image' link in the caption to see a high resolution image.

Figure A.34 Proposed amendments to the settlement boundary for Ashton Keynes



Crudwell

A.50 *Figure A.35 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Crudwell. Click on the 'Popup full image' link in the caption to see a high resolution image.*

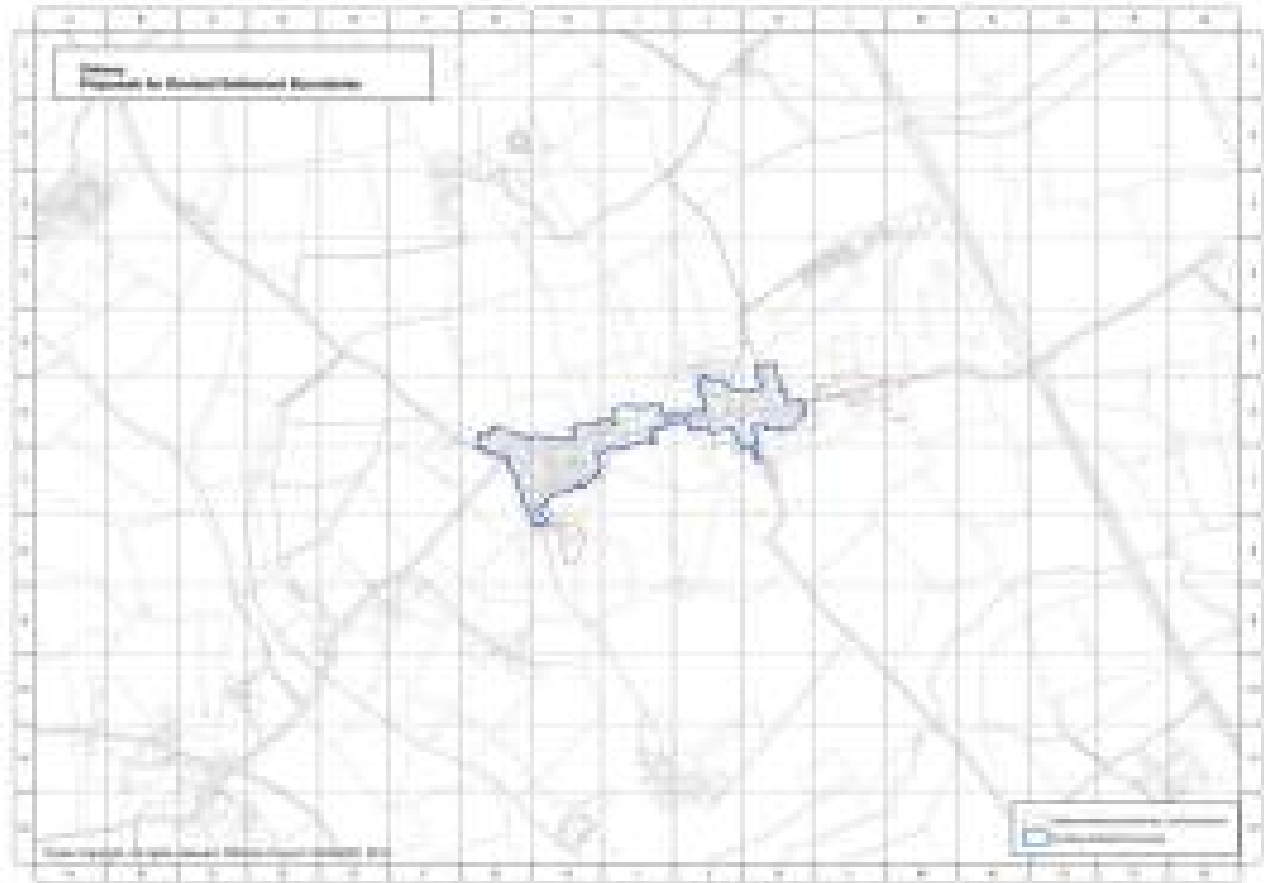
Figure A.35 Proposed amendments to the settlement boundary for Crudwell



Oaksey

A.51 *Figure A.36 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Oaksey. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.36 Proposed amendments to the settlement boundary for Oaksey



Sherston

A.52 *Figure A.37 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Sherston. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.37 Proposed amendments to the settlement boundary for Sherston



Melksham Community Area

A.53 The following settlement boundaries in the Melksham Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Melksham and Bowerhill
- Atworth
- Seend
- Semington
- Shaw and Whitley, and
- Steeple Ashton

Melksham and Bowerhill

A.54 *Figure A.38 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Melksham and Bowerhill. Click on the 'Popup full image' link in the caption to see a high resolution image.*

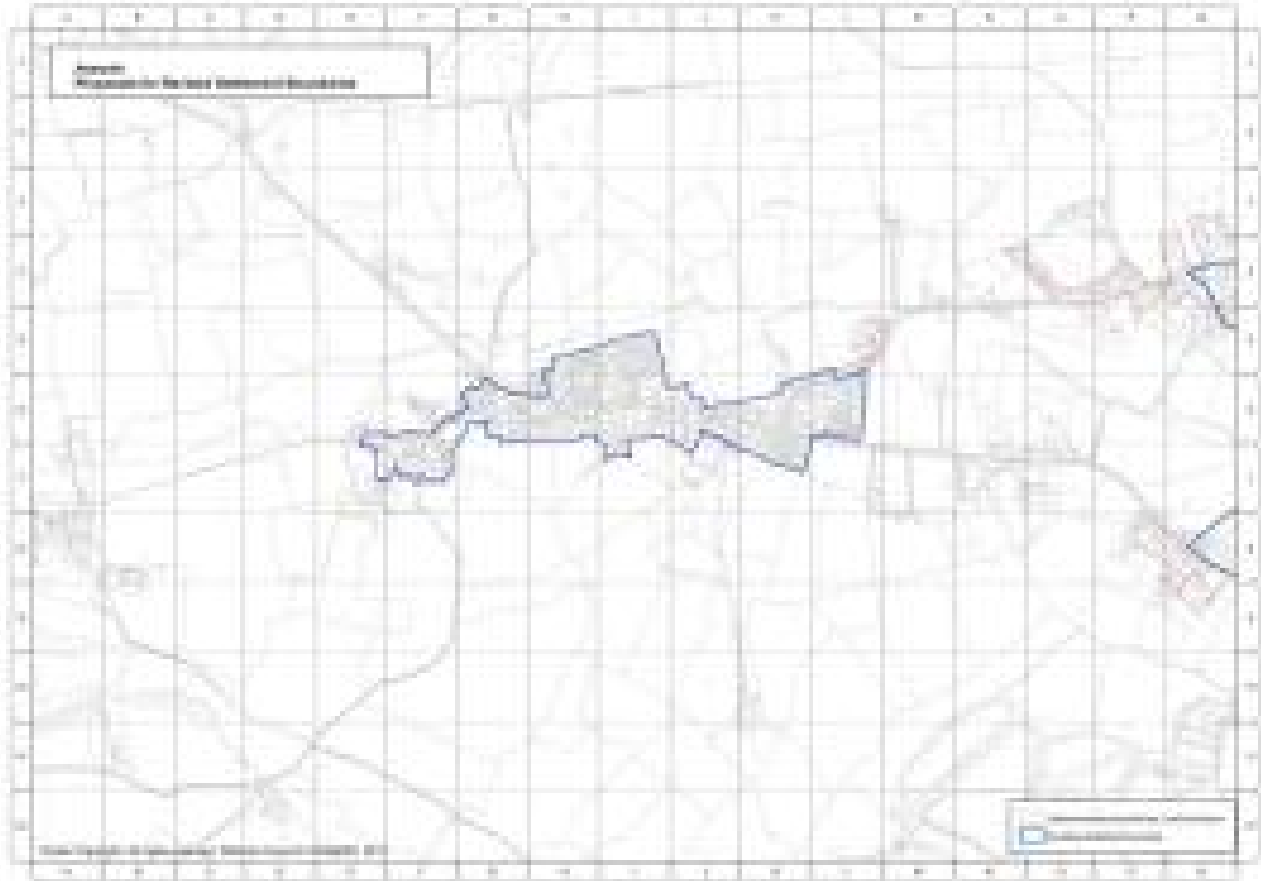
Figure A.38 Proposed amendments to the settlement boundary for Melksham and Bowerhill



Atworth

A.55 *Figure A.39 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Atworth. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.39 Proposed amendments to the settlement boundary for Atworth



Seend

A.56 *Figure A.40 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Seend. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.40 Proposed amendments to the settlement boundary for Seend



Semington

A.57 *Figure A.41 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Semington. Click on the 'Popup full image' link in the caption to see a high resolution image.*

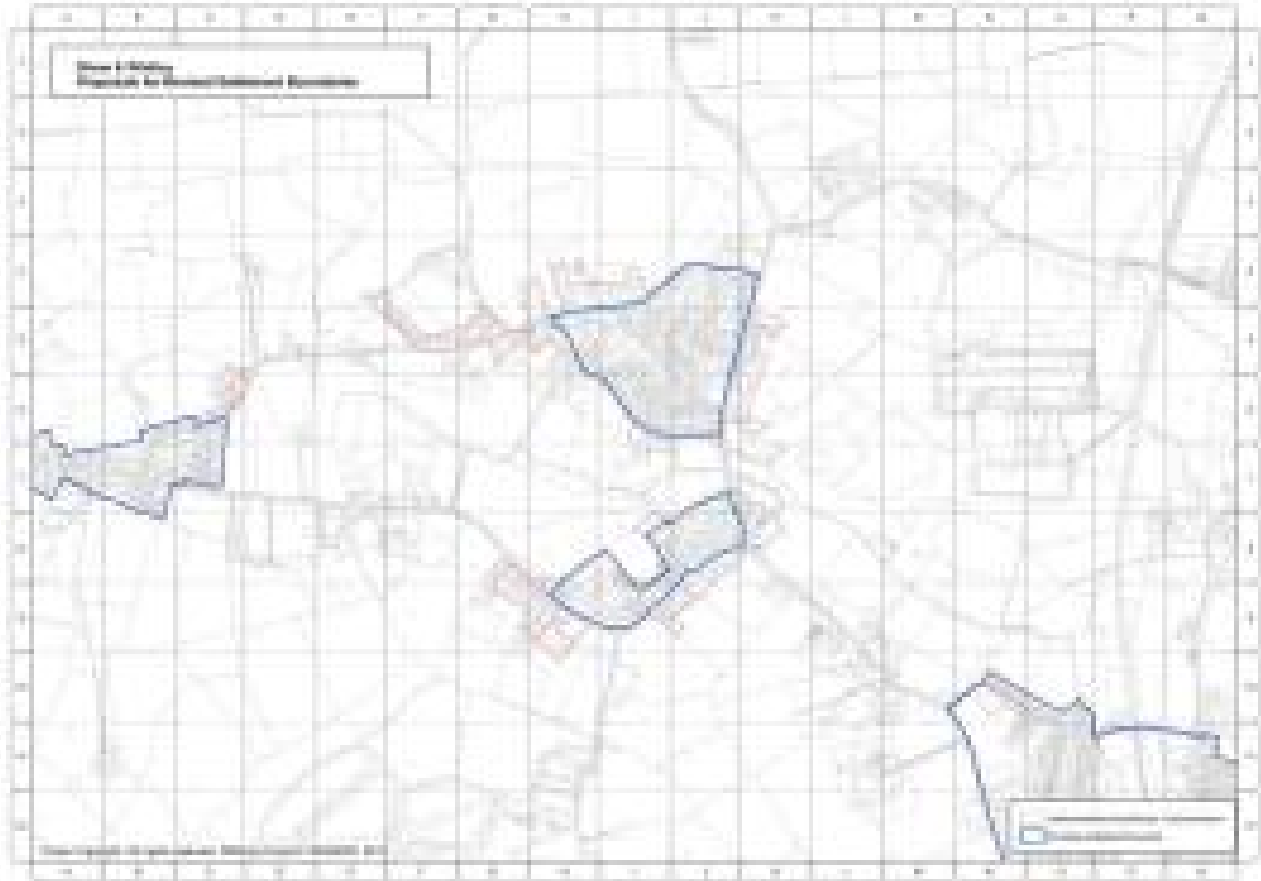
Figure A.41 Proposed amendments to the settlement boundary for Semington



Shaw and Whitley

A.58 *Figure A.42 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Shaw and Whitley. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.42 Proposed amendments to the settlement boundary for Shaw and Whitley



Steeple Ashton

A.59 *Figure A.43 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Steeple Ashton. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.43 Proposed amendments to the settlement boundary for Steeple Ashton



Royal Wootton Bassett and Cricklade Community Area

A.60 The following settlement boundaries in the Royal Wootton Bassett and Cricklade Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Royal Wootton Bassett
- Cricklade
- Lyneham, and
- Purton

Royal Wootton Bassett

A.61 *Figure A.44 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Royal Wootton Bassett. Click on the 'Popup full image' link in the caption to see a high resolution image.*

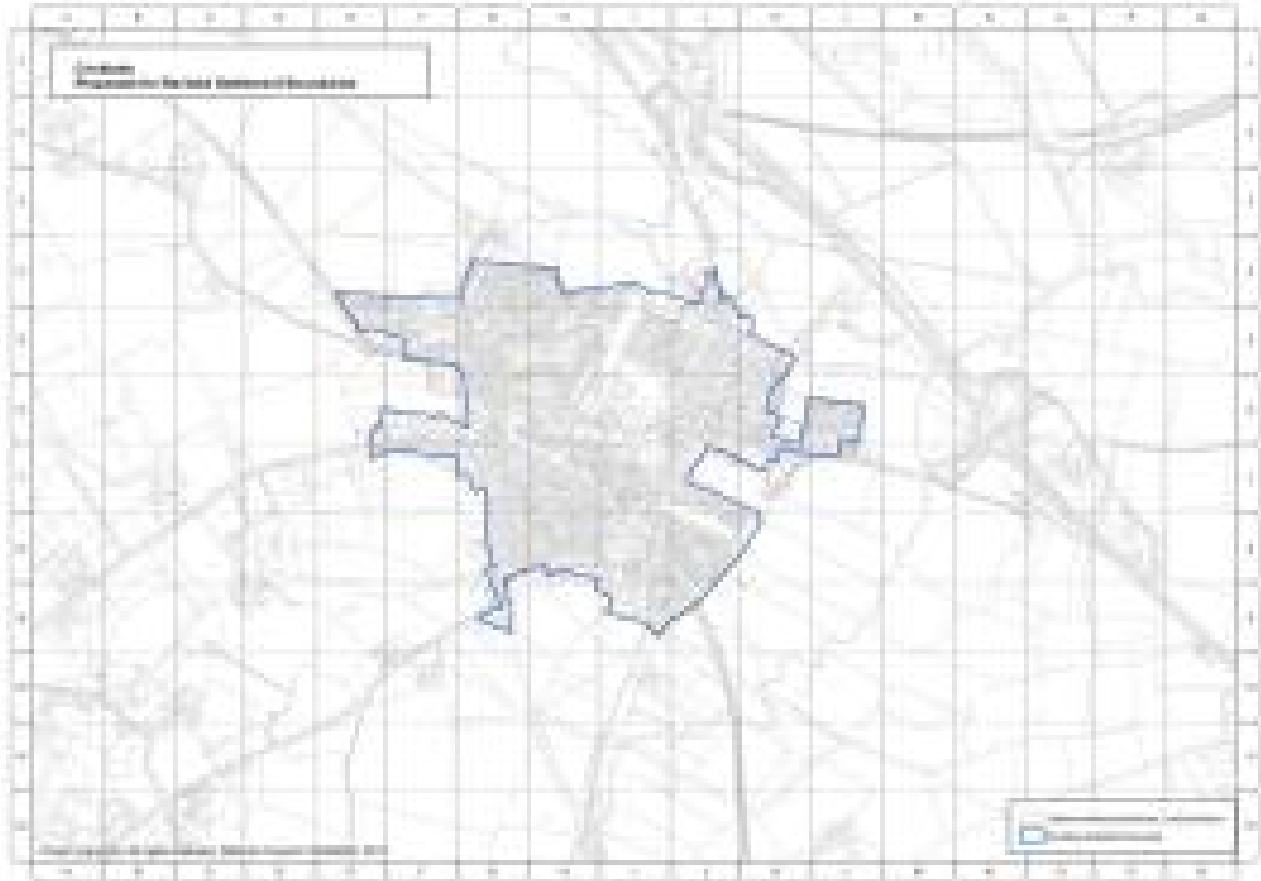
Figure A.44 Proposed amendments to the settlement boundary for Royal Wootton Bassett



Cricklade

A.62 *Figure A.45 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Cricklade. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.45 Proposed amendments to the settlement boundary for Cricklade



Lyneham

A.63 *Figure A.46 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Lyneham. Click on the 'Popup full image' link in the caption to see a high resolution image.*

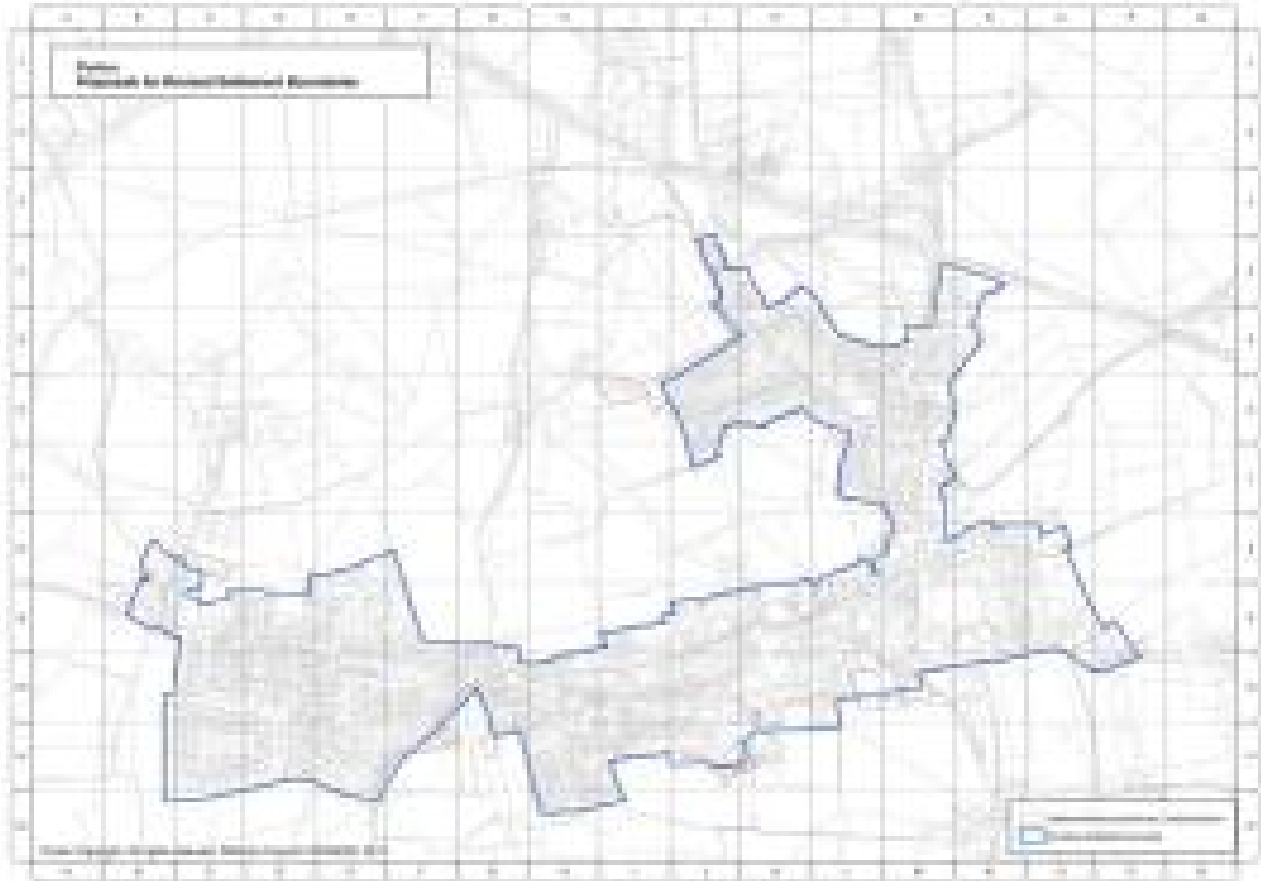
Figure A.46 Proposed amendments to the settlement boundary for Lyneham



Purton

A.64 *Figure A.47 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Purton. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.47 Proposed amendments to the settlement boundary for Purton



Trowbridge Community Area

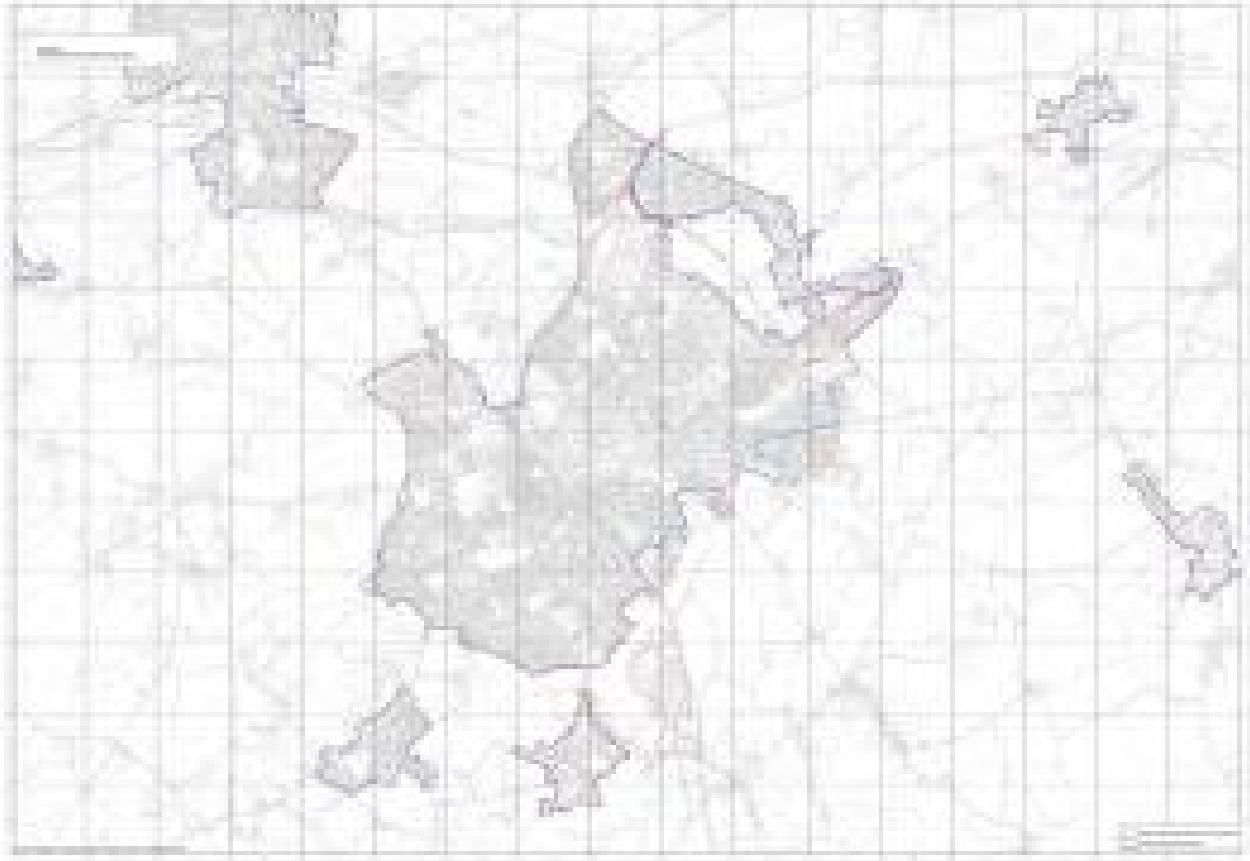
A.65 The following settlement boundaries in the Trowbridge Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Trowbridge
- Hilperton
- North Bradley, and
- Southwick

Trowbridge

A.66 *Figure A.48 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Trowbridge. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.48 Proposed amendments to the settlement boundary for Trowbridge



Hilperton

A.67 *Figure A.49 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Hilperton. Click on the 'Popup full image' link in the caption to see a high resolution image.*

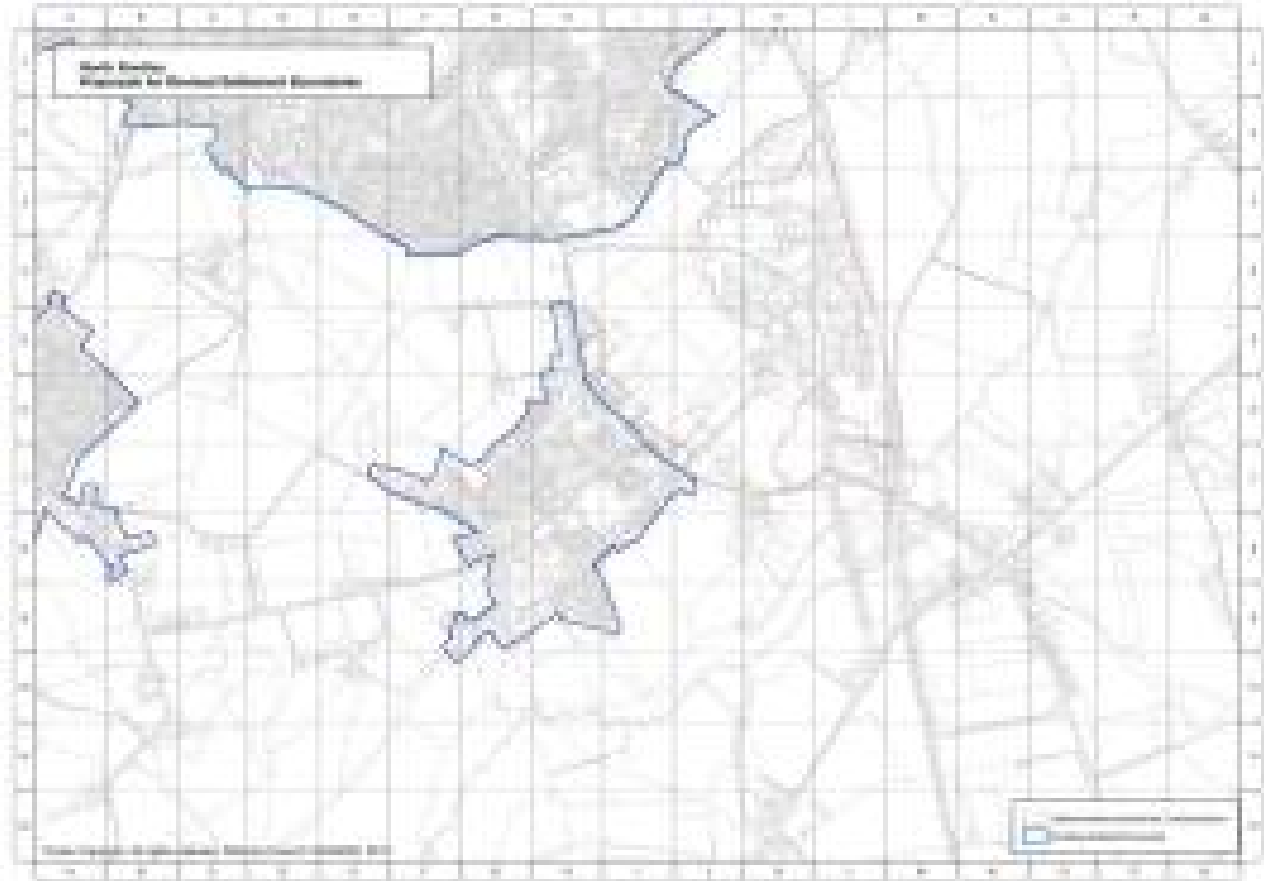
Figure A.49 Proposed amendments to the settlement boundary for Hilperton



North Bradley

A.68 *Figure A.50 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for North Bradley. Click on the 'Popup full image' link in the caption to see a high resolution image.*

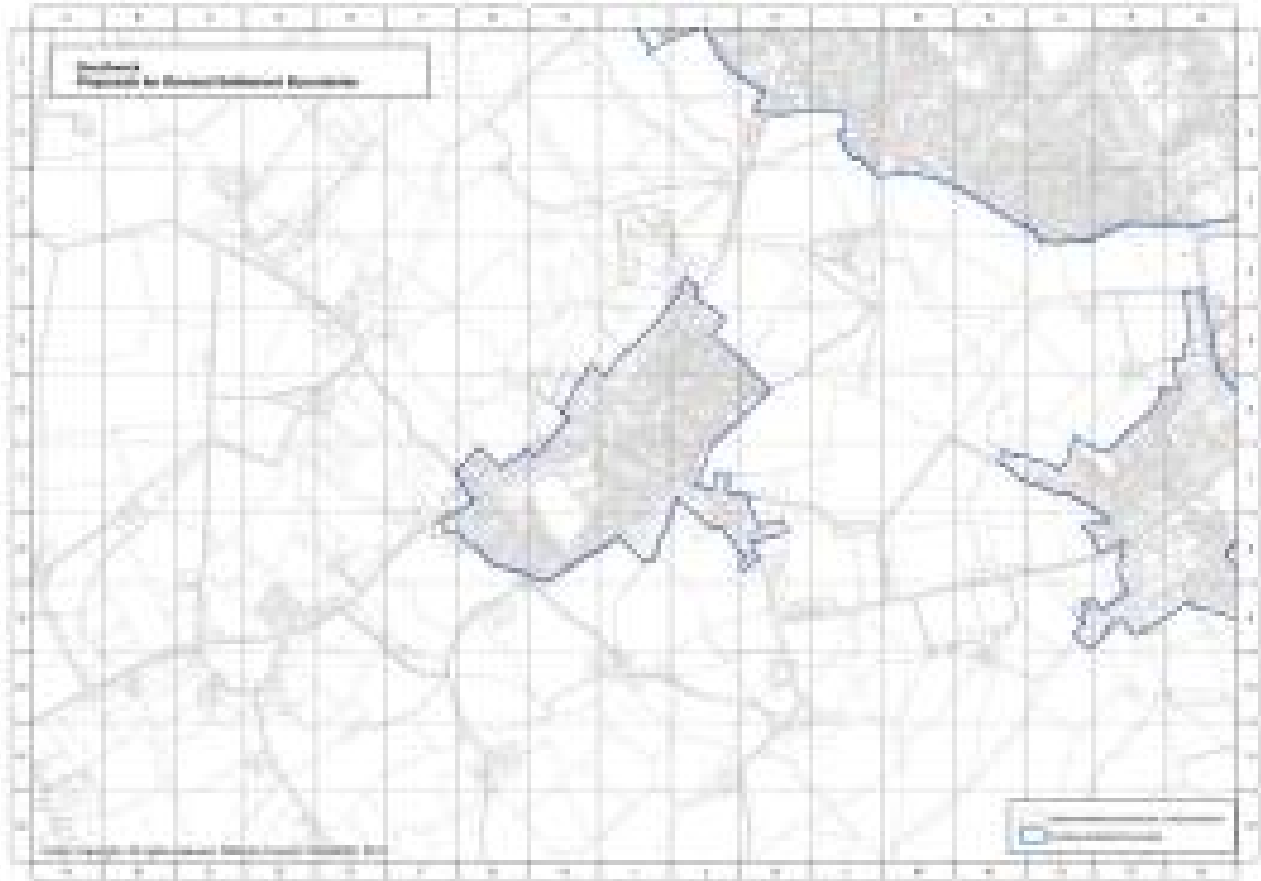
Figure A.50 Proposed amendments to the settlement boundary for North Bradley



Southwick

A.69 *Figure A.51* below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Southwick. Click on the 'Popup full image' link in the caption to see a high resolution image.

Figure A.51 Proposed amendments to the settlement boundary for Southwick



Warminster Community Area

A.70 The following settlement boundaries in the Warminster Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Warminster
- Chapmanslade
- Codford
- Corsley
- Heytesbury, and
- Sutton Veny

Warminster

A.71 *Figure A.52 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Warminster. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.52 Proposed amendments to the settlement boundary for Warminster



Chapmanslade

A.72 *Figure A.53 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Chapmanslade. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.53 Proposed amendments to the settlement boundary for Chapmanslade



Codford

A.73 *Figure A.54 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Codford. Click on the 'Popup full image' link in the caption to see a high resolution image.*

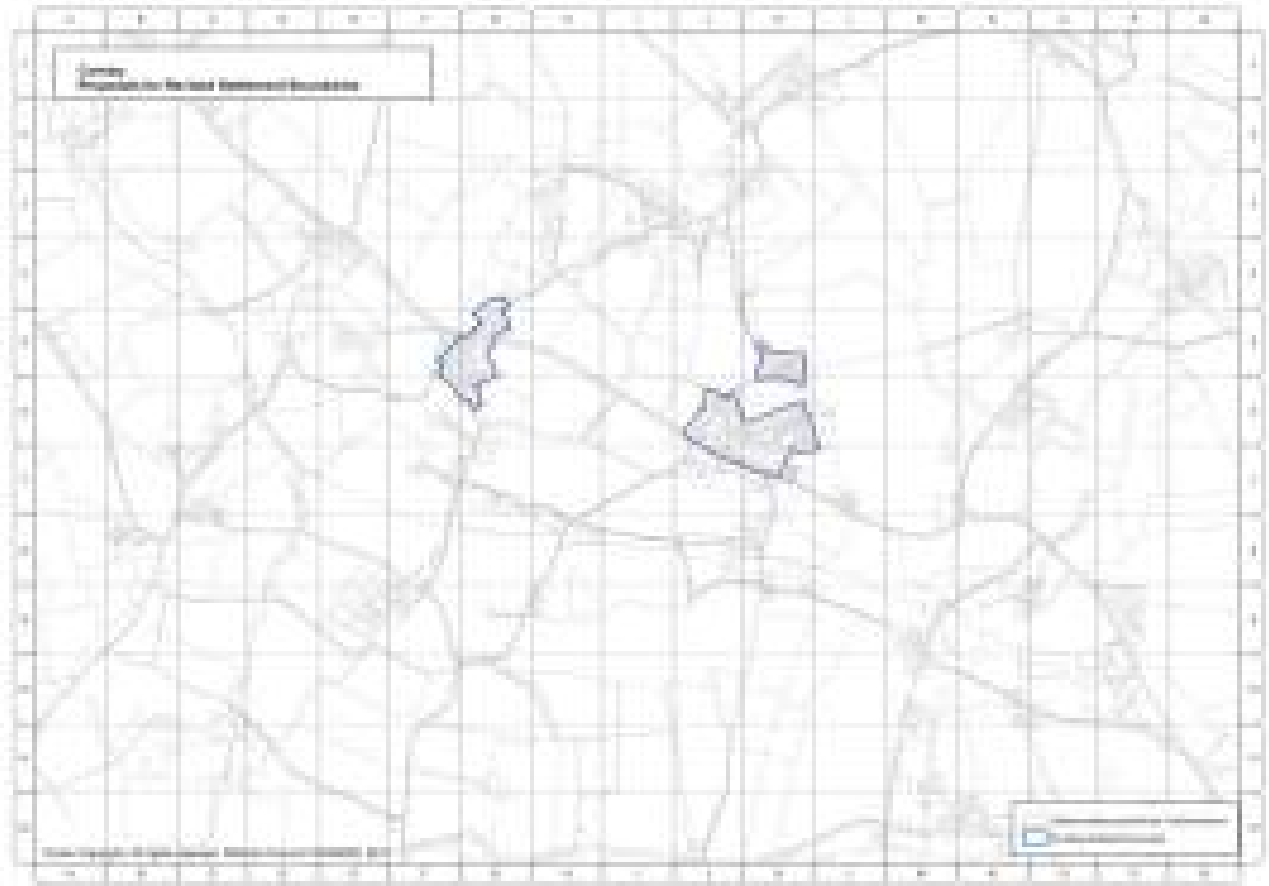
Figure A.54 Proposed amendments to the settlement boundary for Codford



Corsley

A.74 *Figure A.55 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Corsley. Click on the 'Popup full image' link in the caption to see a high resolution image.*

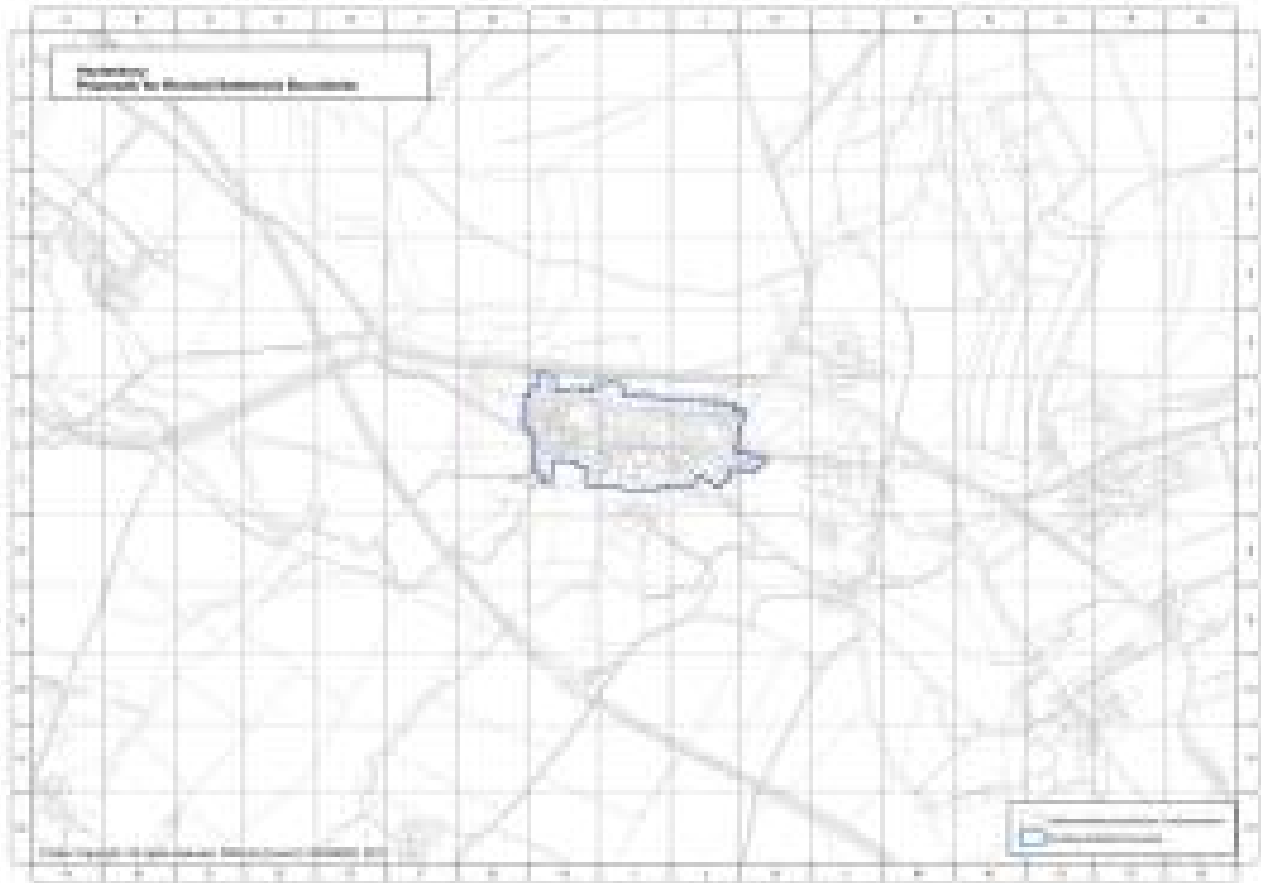
Figure A.55 Proposed amendments to the settlement boundary for Corsley



Heytesbury

- A.75** *Figure A.56 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Heytesbury. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.56 Proposed amendments to the settlement boundary for Heytesbury



Sutton Veny

A.76 *Figure A.57 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Sutton Veny. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.57 Proposed amendments to the settlement boundary for Sutton Veny



Westbury Community Area

A.77 The following settlement boundaries in the Westbury Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Westbury
- Bratton, and
- Dilton Marsh

Westbury

A.78 *Figure A.58 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Westbury. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.58 Proposed amendments to the settlement boundary for Westbury



Bratton

A.79 *Figure A.59 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Bratton. Click on the 'Popup full image' link in the caption to see a high resolution image.*

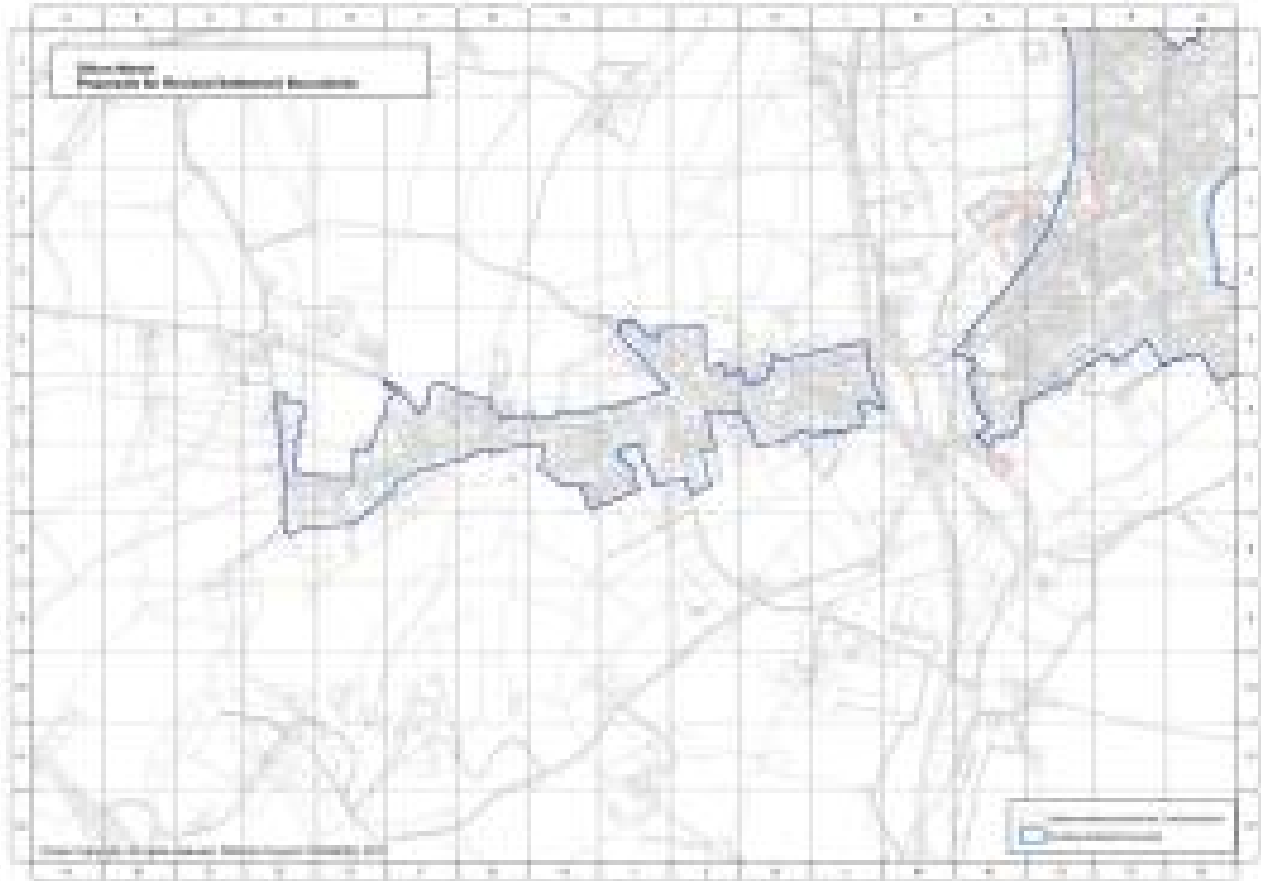
Figure A.59 Proposed amendments to the settlement boundary for Bratton



Dilton Marsh

A.80 *Figure A.60 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Dilton Marsh. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.60 Proposed amendments to the settlement boundary for Dilton Marsh



South Wiltshire Housing Market Area

Amesbury Community Area

A.81 The following settlement boundaries in the Amesbury Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

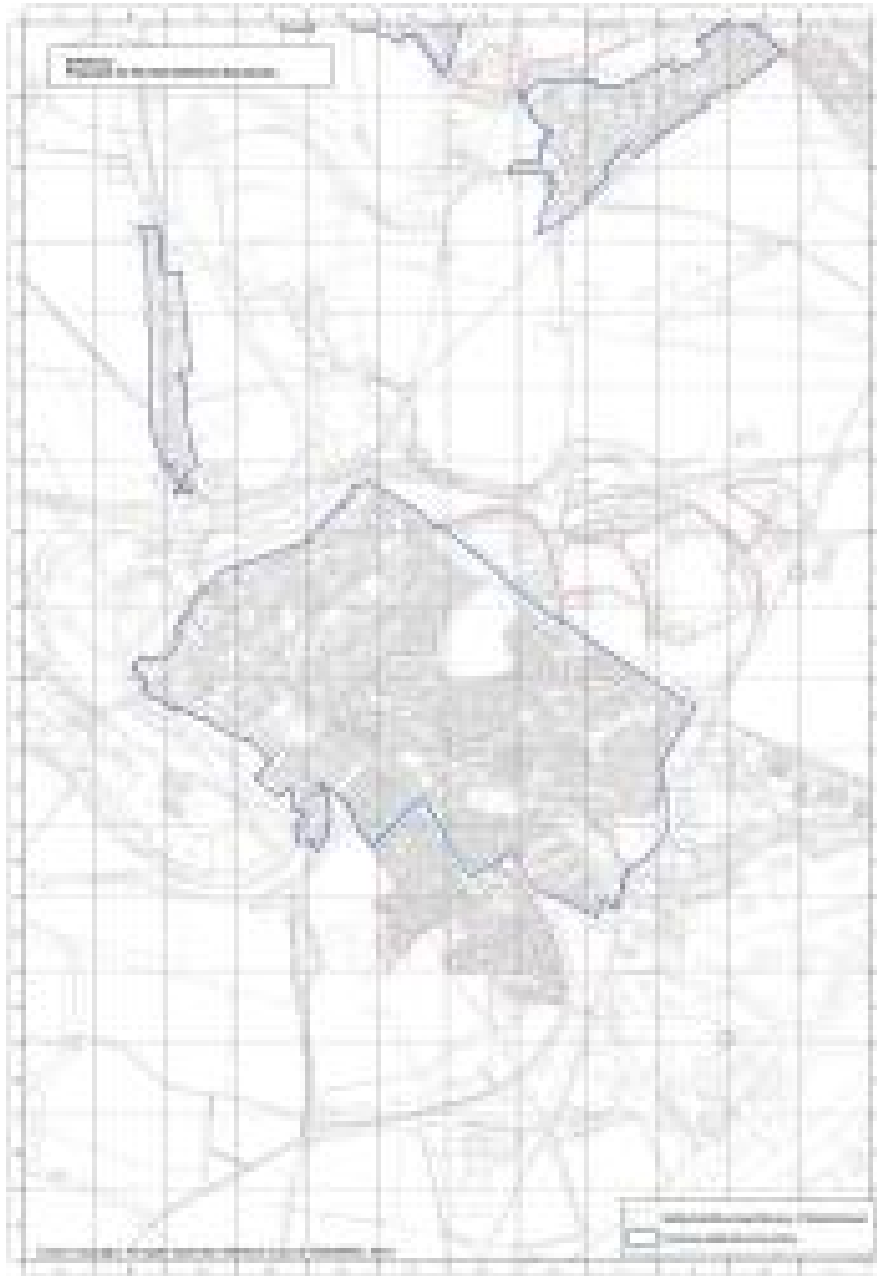
- Amesbury
- Bulford
- Durrington
- Great Wishford
- Shrewton
- The Winterbournes, and
- Tilshead

A.82 The settlement boundary for Porton has not been reviewed because of a neighbourhood plan (Idmiston NP).

Amesbury

A.83 *Figure A.61 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Amesbury. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.61 Proposed amendments to the settlement boundary for Amesbury



Bulford

A.84 *Figure A.62 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Bulford. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.62 Proposed amendments to the settlement boundary for Bulford



Durrington

A.85 *Figure A.63 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Durrington. Click on the 'Popup full image' link in the caption to see a high resolution image.*

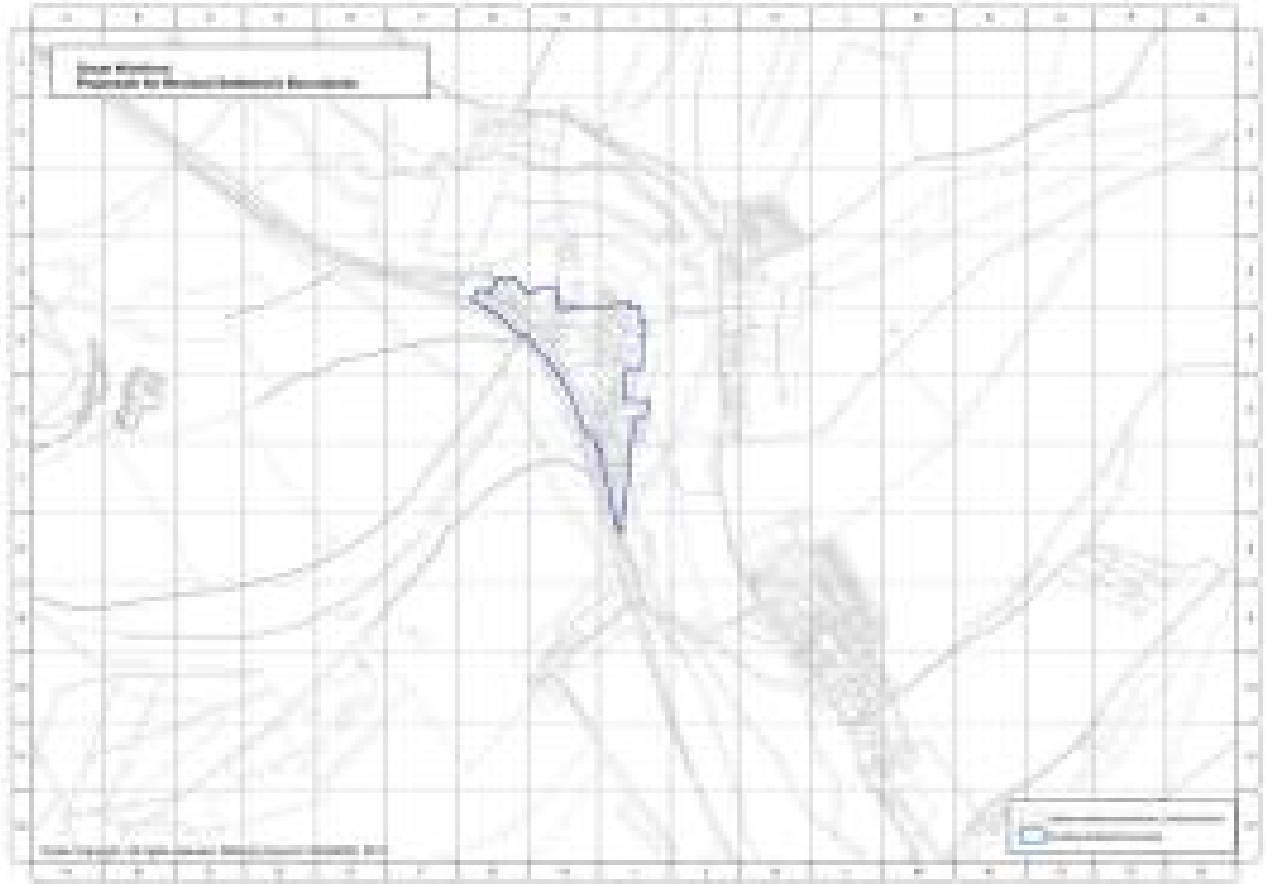
Figure A.63 Proposed amendments to the settlement boundary for Durrington



Great Wishford

A.86 Figure A.64 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Great Wishford. Click on the 'Popup full image' link in the caption to see a high resolution image.

Figure A.64 Proposed amendments to the settlement boundary for Great Wishford



Shrewton

A.87 *Figure A.65 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Shrewton. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.65 Proposed amendments to the settlement boundary for Shrewton



The Winterbournes

A.88 *Figure A.66 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for The Winterbournes. Click on the 'Popup full image' link in the caption to see a high resolution image.*

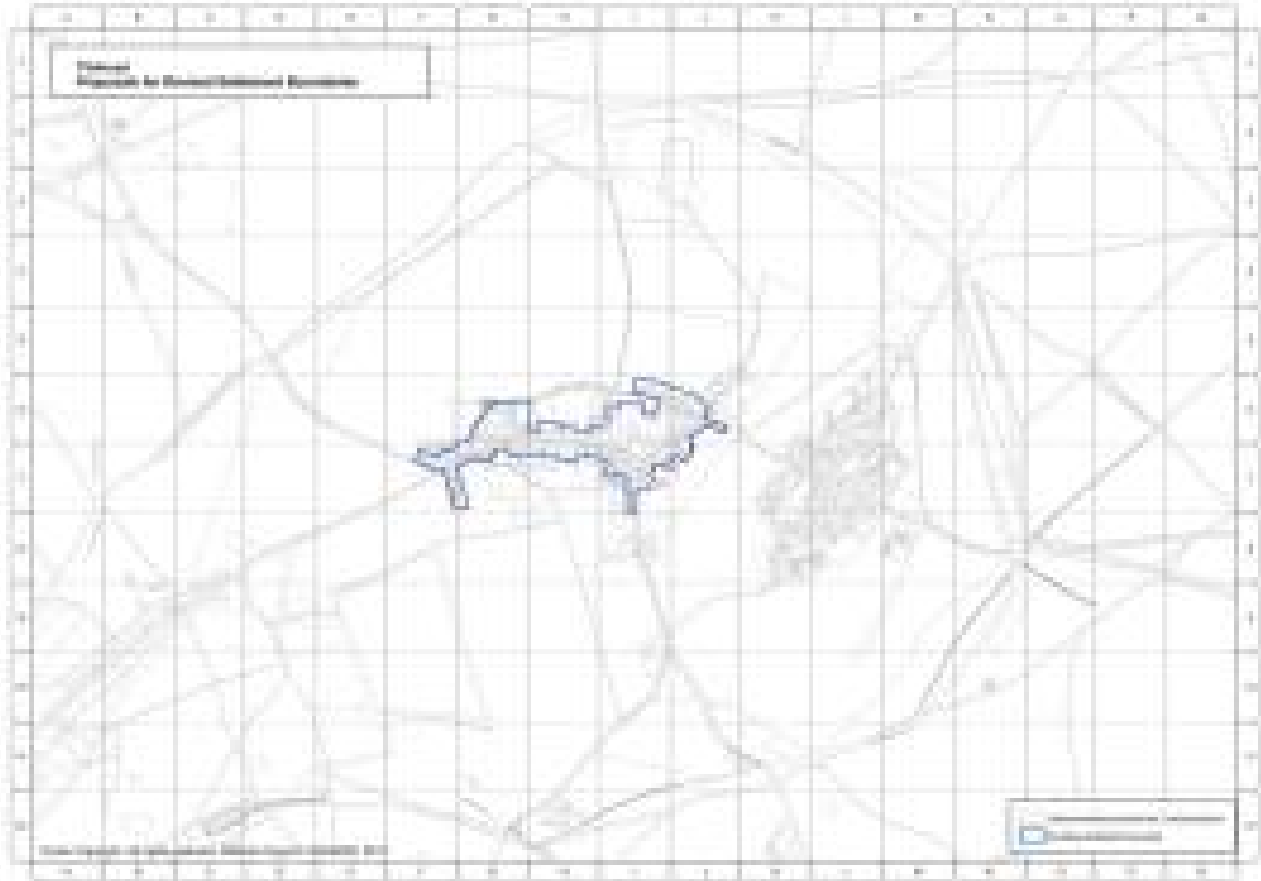
Figure A.66 Proposed amendments to the settlement boundary for The Winterbournes



Tilshead

A.89 *Figure A.67 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Tilshead. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.67 Proposed amendments to the settlement boundary for Tilshead



Mere Community Area

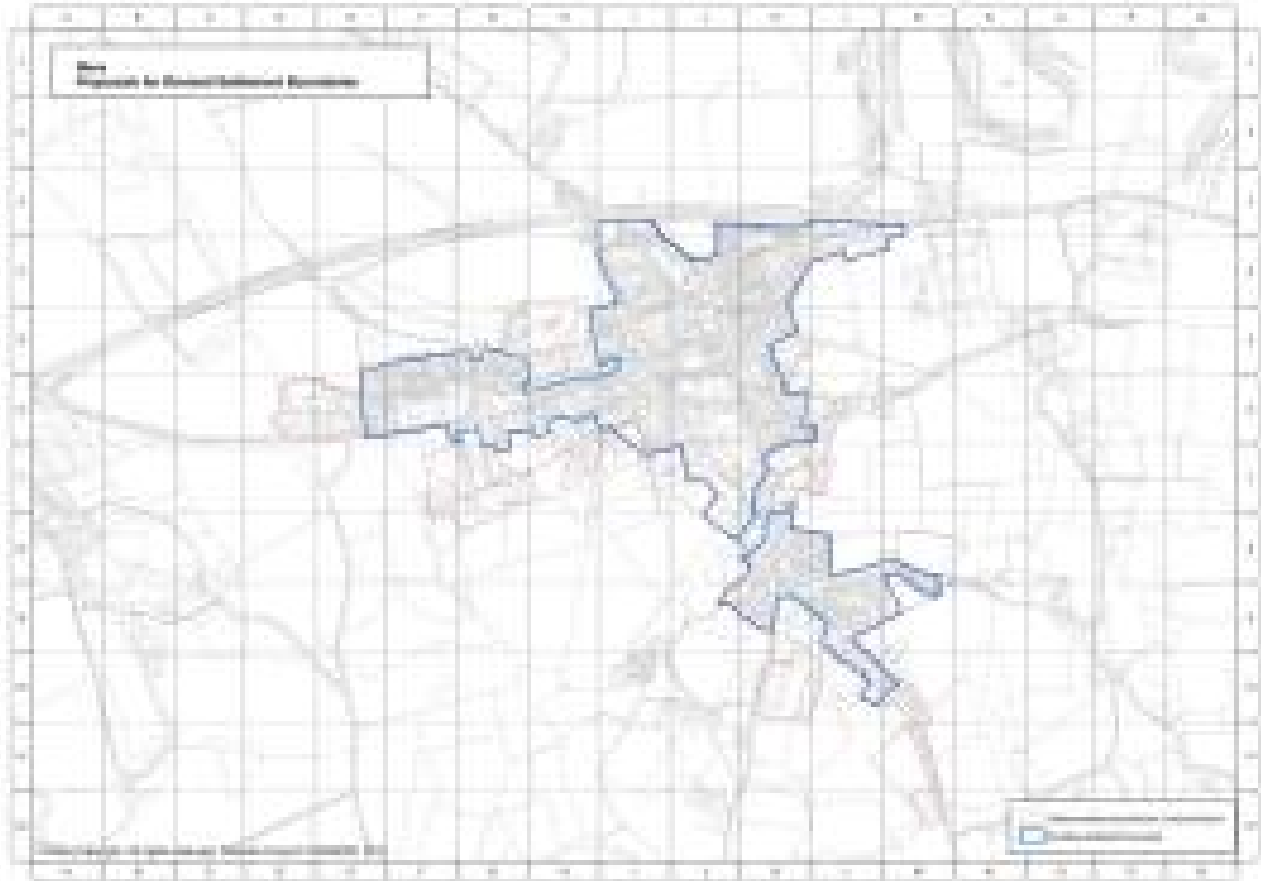
A.90 The following settlement boundaries in the Mere Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Mere

Mere

A.91 *Figure A.68 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Mere. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.68 Proposed amendments to the settlement boundary for Mere



Salisbury Community Area

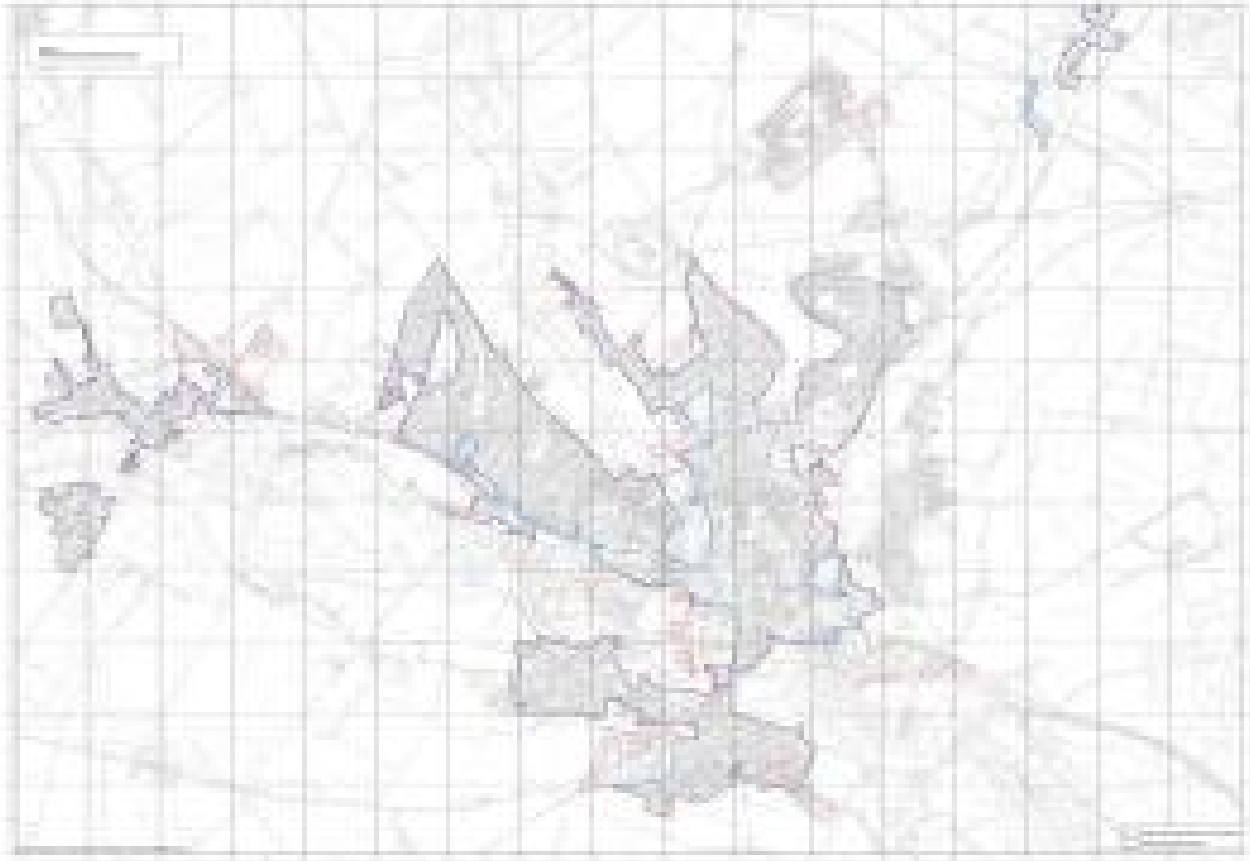
A.92 The following settlement boundaries in the Salisbury Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Salisbury

Salisbury

A.93 *Figure A.69 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Salisbury. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.69 Proposed amendments to the settlement boundary for Salisbury



Southern Wiltshire Community Area

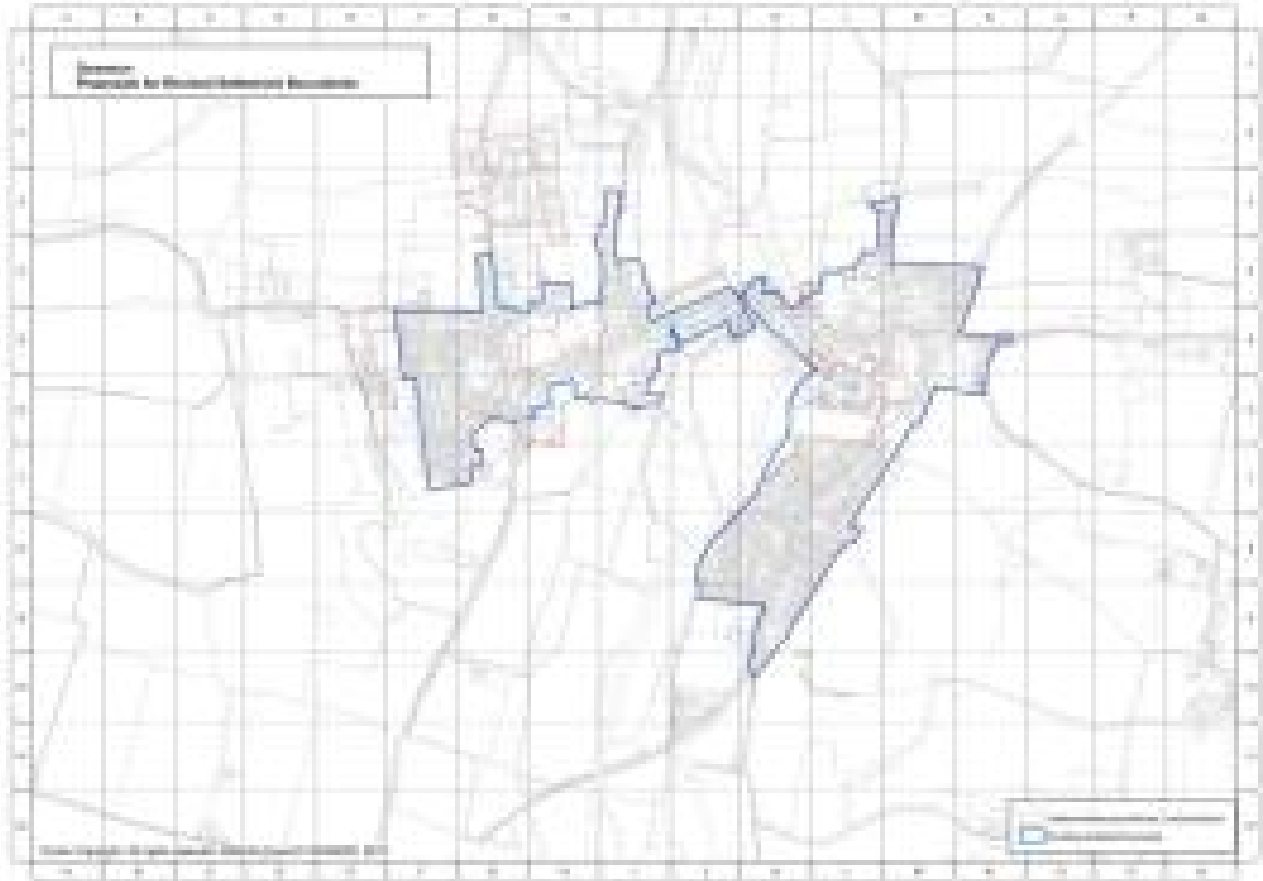
A.94 The following settlement boundaries in the Southern Wiltshire Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Downton
- Alderbury
- Combe Bissett
- Morgan Vale and Woodfalls
- Pitton
- Whiteparish, and
- Winterslow

Downton

- A.95** *Figure A.70 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Downton. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.70 Proposed amendments to the settlement boundary for Downton



Alderbury

A.96 *Figure A.71 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Alderbury. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.71 Proposed amendments to the settlement boundary for Alderbury



Combe Bissett

A.97 *Figure A.72 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Combe Bissett. Click on the 'Popup full image' link in the caption to see a high resolution image.*

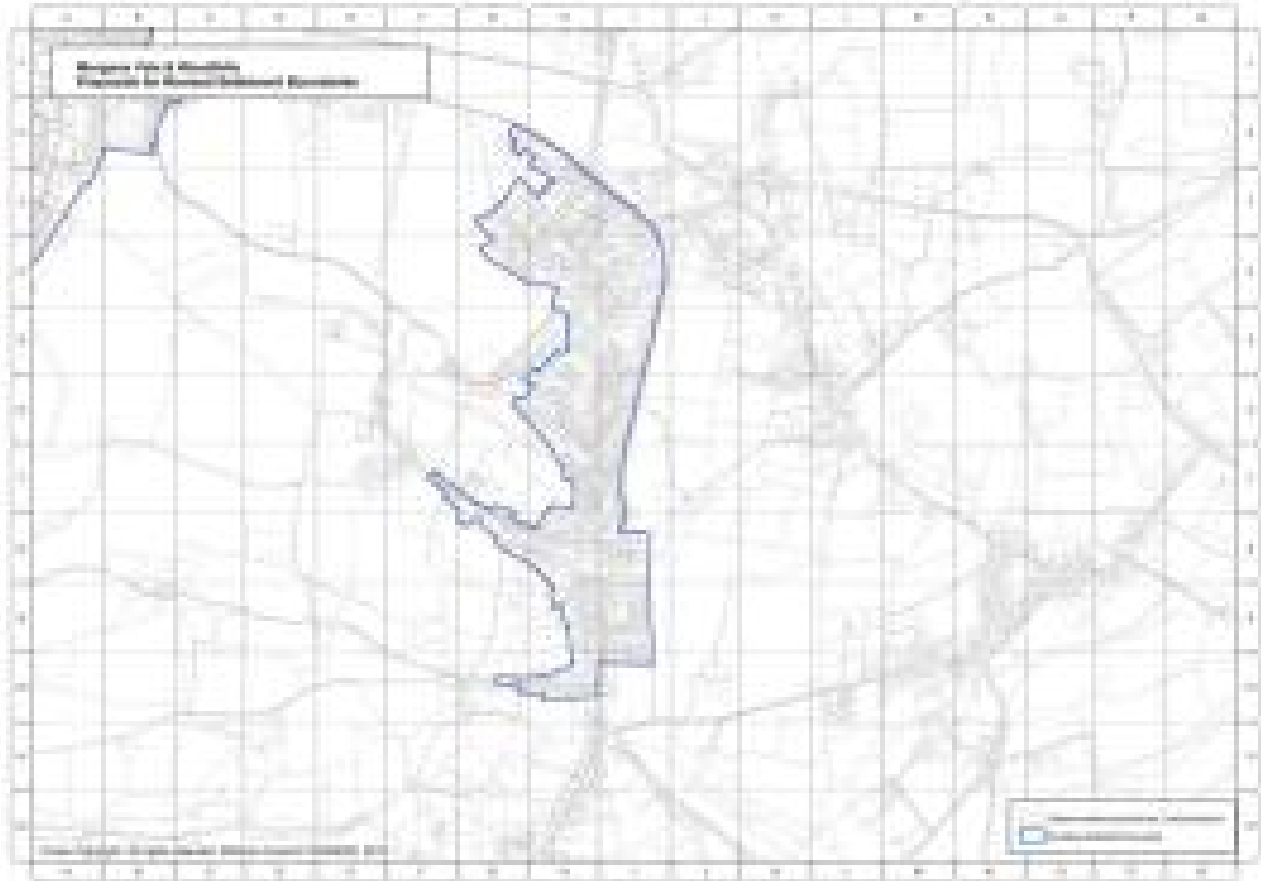
Figure A.72 Proposed amendments to the settlement boundary for Combe Bissett



Morgan Vale and Woodfalls

A.98 *Figure A.73 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Morgan Vale and Woodfalls. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.73 Proposed amendments to the settlement boundary for Morgan Vale and Woodfalls



Pitton

A.99 *Figure A.74 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Pitton. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.74 Proposed amendments to the settlement boundary for Pitton



Whiteparish

A.100 *Figure A.75 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Whiteparish. Click on the 'Popup full image' link in the caption to see a high resolution image.*

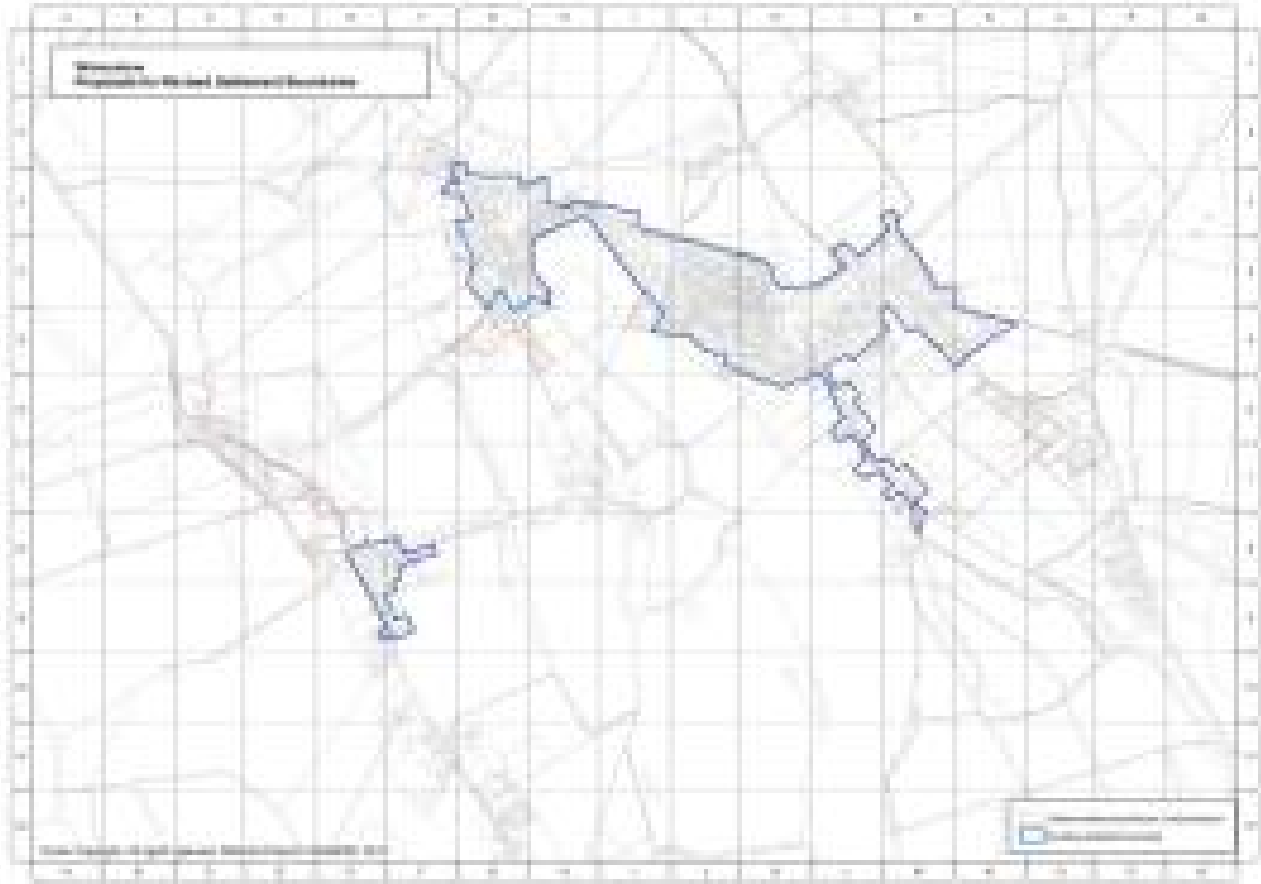
Figure A.75 Proposed amendments to the settlement boundary for Whiteparish



Winterslow

A.101 *Figure A.76 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Downton. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.76 Proposed amendments to the settlement boundary for Winterslow



Tisbury Community Area

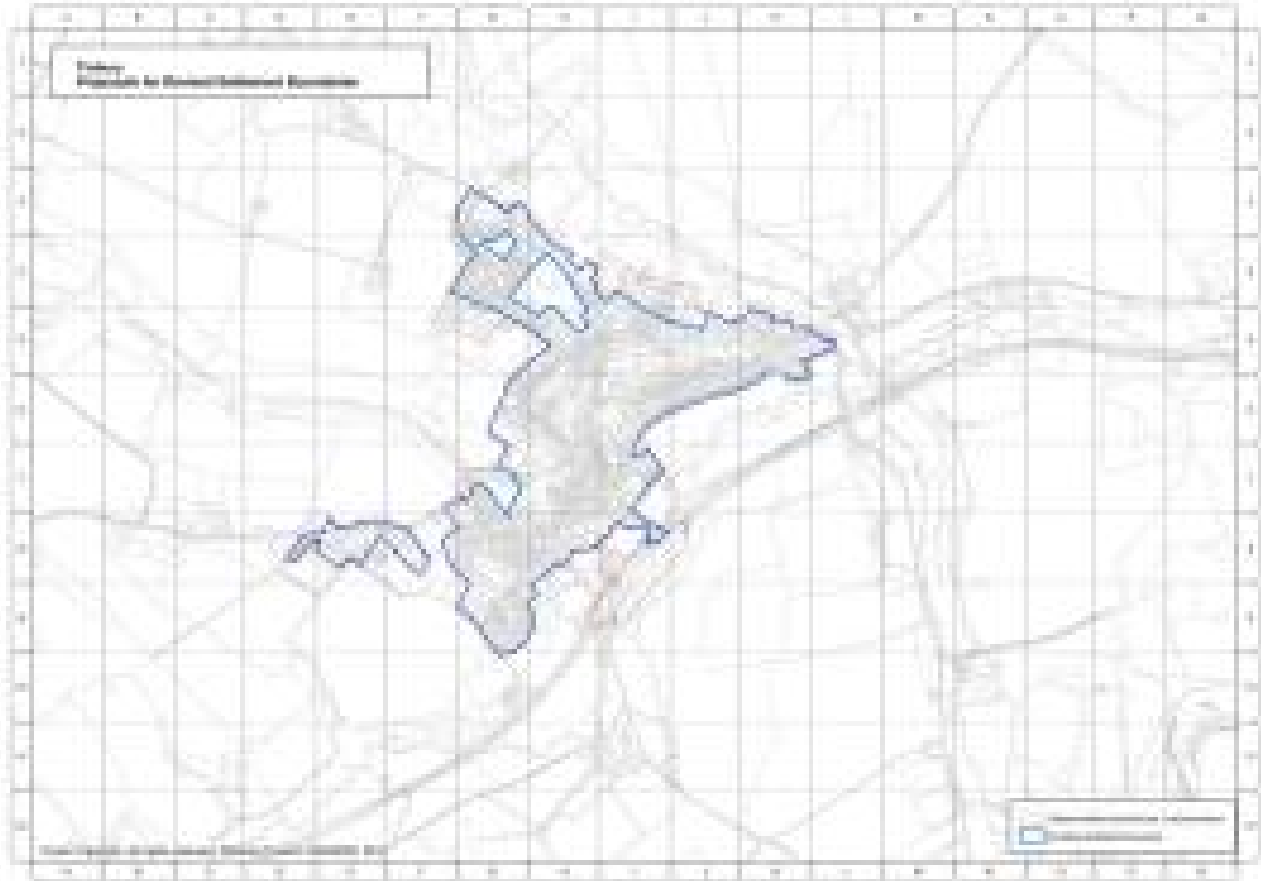
A.102 The following settlement boundaries in the Tisbury Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Tisbury
- Fovant
- Hindon, and
- Ludwell

Tisbury

A.103 *Figure A.77 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Tisbury. Click on the 'Popup full image' link in the caption to see a high resolution image.*

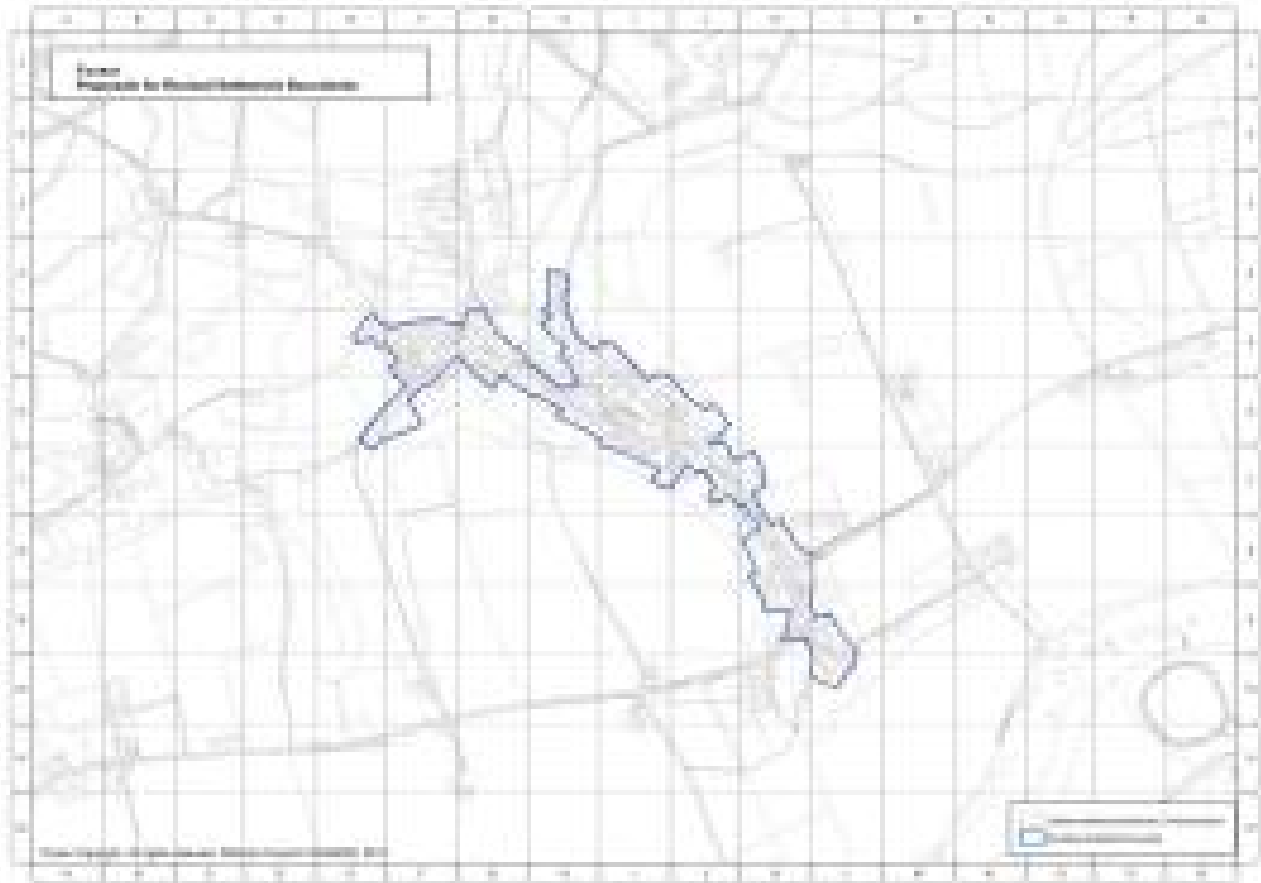
Figure A.77 Proposed amendments to the settlement boundary for Tisbury



Fovant

A.104 *Figure A.78 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Fovant. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.78 Proposed amendments to the settlement boundary for Fovant



Hindon

A.105 *Figure A.79 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Hindon. Click on the 'Popup full image' link in the caption to see a high resolution image.*

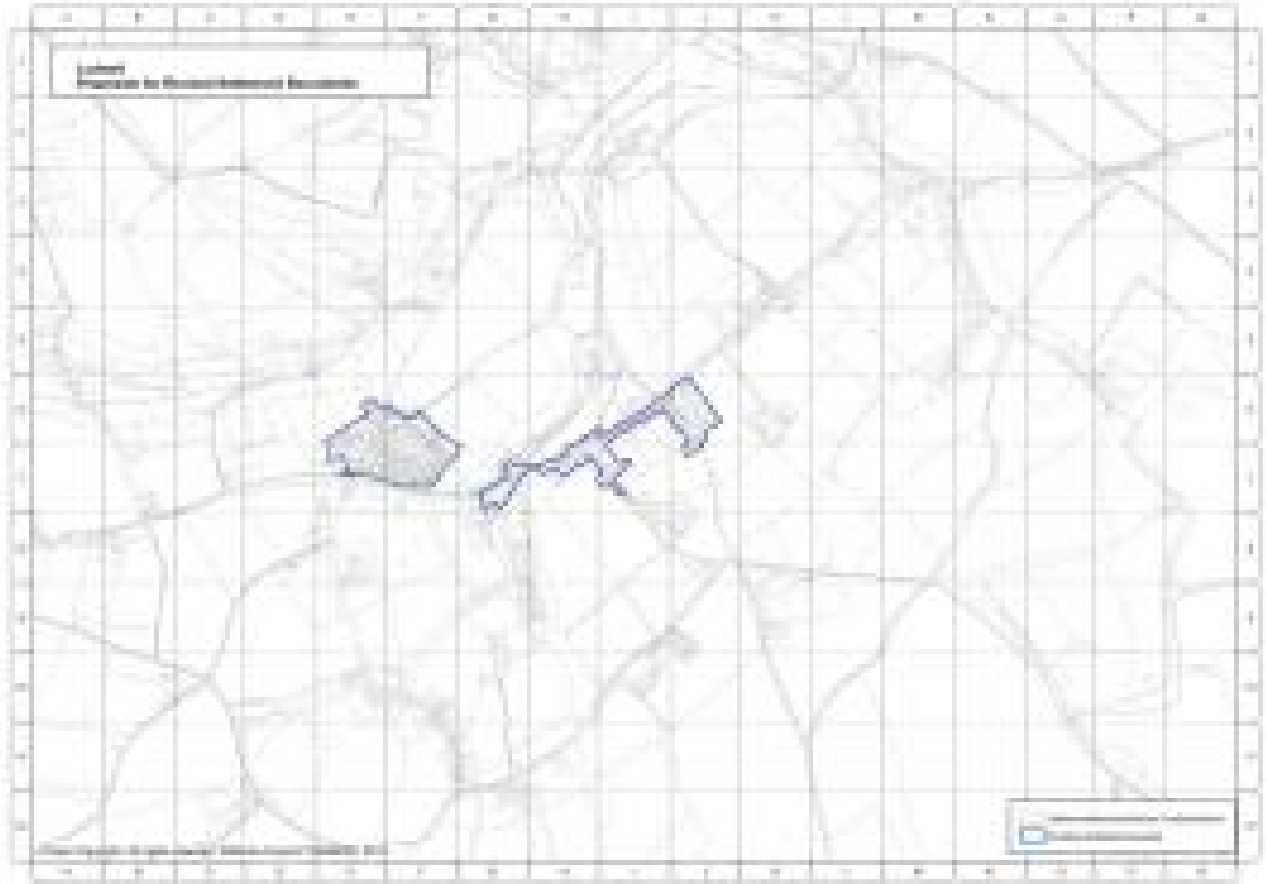
Figure A.79 Proposed amendments to the settlement boundary for Hindon



Ludwell

A.106 *Figure A.80 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Ludwell. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.80 Proposed amendments to the settlement boundary for Ludwell



Wilton Community Area

A.107 The following settlement boundaries in the Wilton Community Area have been reviewed by the Wiltshire Housing Site Allocations Plan:

- Wilton
- Broad Chalke, and
- Dinton

Wilton

A.108 *Figure A.81 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Wilton. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.81 Proposed amendments to the settlement boundary for Wilton



Broad Chalke

A.109 *Figure A.82 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Broad Chalke. Click on the 'Popup full image' link in the caption to see a high resolution image.*

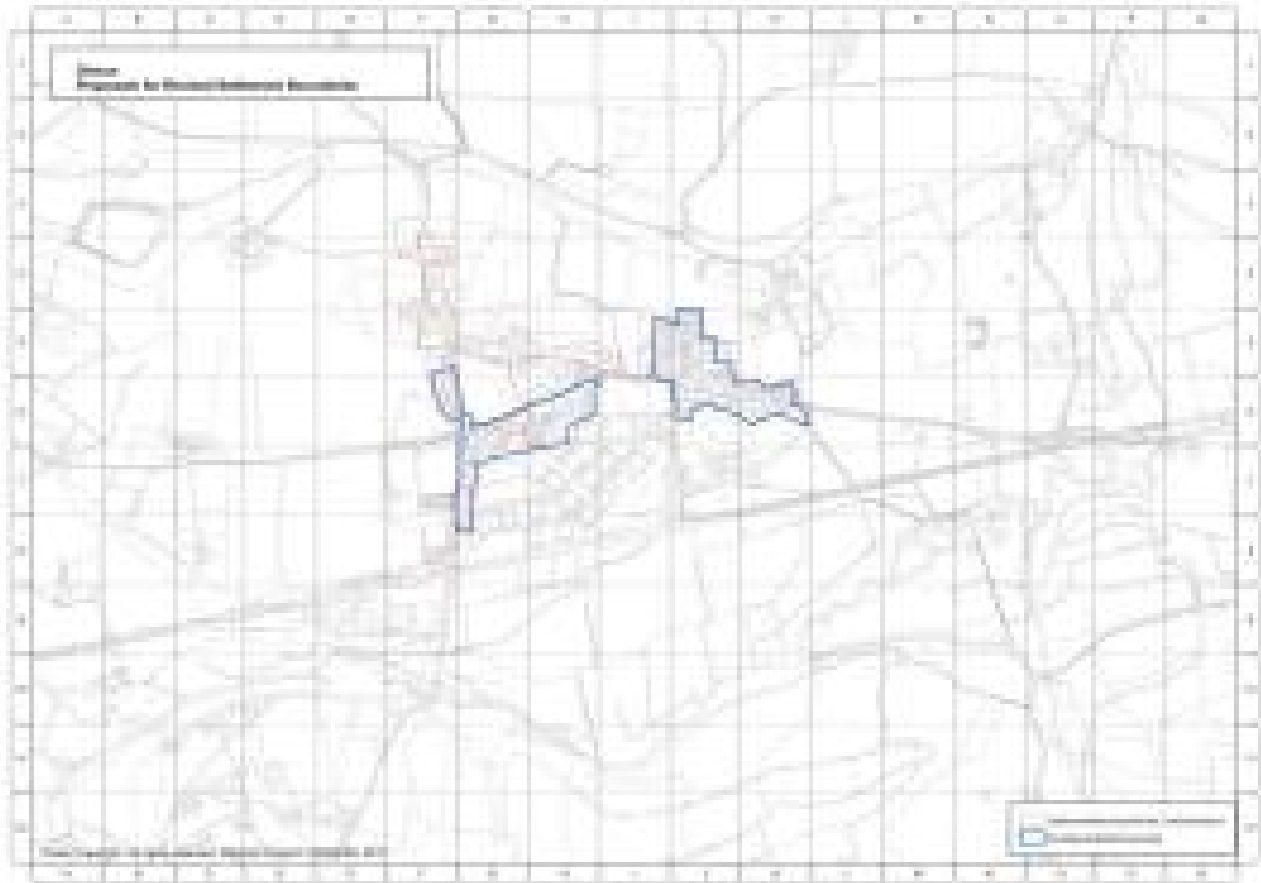
Figure A.82 Proposed amendments to the settlement boundary for Broad Chalke



Dinton

A.110 *Figure A.83 below shows the proposed amendments to the settlement boundary (in red) and the existing settlement boundary for Dinton. Click on the 'Popup full image' link in the caption to see a high resolution image.*

Figure A.83 Proposed amendments to the settlement boundary for Dinton



This document was published by the Spatial Planning team, Wiltshire Council, Economic Development and Planning Services.

For further information please visit the following website:

<http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan.htm>

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Table 1: Proposed Changes

Proposed change ref Number	Policy/ Para reference	Key Issue/ Rep Numbers	Reason for Proposed Change	Proposed Change	Minor or main Modification
Chapter 4 Housing delivery strategy					
PC1	Tables 4.1, 4.7, 4.8, 4.9, 4.10, 4.11		Factual update to tables to reflect the latest housing land supply statement published March 2018 (base date April 2017).	See updated Tables 4.1, 4.7, 4.8, 4.9, 4.10 and 4.11 ¹ .	Minor
PC2	Tables 4.4 and 4.6		Update to tables to show proposed changes to list of allocations in response to Proposed Changes 34, 39, 43, 49, 73 and 77.	See updated Tables 4.5 and 4.6 (see addendum to this Schedule).	Minor
PC3	Paragraph 4.2		To improve clarity.	Amend the paragraph to read: “The figures above <i>do not include windfall and</i> show a minimum that the Plan should aim to allocate, but a surplus is necessary to maintain five years supply of housing land in each HMA and to surpass the buffer in excess of five years required by the NPPF.”	Minor
PC4	Paragraph 4.3		To correct a typographical error.	Amend final sentence of paragraph to read: “This supports the sustainable development of the County sought by Objective 2 3 of the Plan. These settlements where allocations are justified are:”	Minor

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¹ The proposed changes to Section 4 of the draft WHSAP are presented in an addendum to this Schedule

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

PC5	Paragraph 4.8		Factual update to reflect the consideration of new sites.	<p>Amend the paragraph to read:</p> <p>“All councils are required to maintain a register of land that has been put forward for development. This is referred to as the Strategic Housing Land Availability Assessment (SHLAA). Wiltshire Council. Within areas of search the SHLAA provides a pool of land opportunities for possible housing development and is the starting point for site assessment. <u>Since the publication of the SHLAA other sites have been promoted to the Council through the consultation on the draft Plan, which would be considered through future updates to the SHLAA, now referred to as the Strategic Housing and Employment Land Availability Assessment (SHELAA). Such sites can also be regarded as SHLAA (SHELAA) sites for site assessment purposes.</u>”</p>	Minor
PC6	Paragraph 4.32		Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	<p>Amend paragraph to read:</p> <p>“Housing trajectories are site by site estimates of start and finish dates and annual completions. Aggregating housing trajectories for each HMA shows how the Plan helps to deliver in excess of five years supply of land in each area for the remaining years of the plan period. The table below provides estimates of how many years supply there will be in each remaining year of the plan period. It shows that supply exceeds the five-year requirement through to the end of the plan period for all years except one four in the South Wiltshire HMA and well before by then additional allocations will be included within the review of the WCS.”</p>	Minor
PC7	Paragraph 4.39		Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	<p>Amend paragraph to read:</p> <p>“The overall pattern of growth is in general conformity with the WCS. It is consistent with the principles of the spatial strategy. Compared to indicative levels, development is focussed slightly more on the Market Towns (+4% +7.2%) and less on the rural settlements (-8% -6.5%).</p>	Minor

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

PC8	Paragraph 4.41		To correct a typographical error.	Change ‘Netheravob’ in second sentence to ‘Netheravon’.	Minor
PC9	Paragraph 4.45		Minor factual amendment to express the degree to which market towns have disproportionately grown in recent years when compared to the Principal Settlements of Trowbridge and Chippenham. This reflects the latest published Housing Land Supply Statement (March 2018).	Amend paragraph to read: “There are marked differences in the anticipated growth <i>of many of the Market Towns in the HMA (including Calne, Malmesbury, Melksham and Bowerhill,</i> and Westbury) over the plan period compared to the two Principal Settlements of the HMA, Chippenham and Trowbridge.”	Minor
PC10	Paragraph 4.47		Minor factual amendment for clarity to reflect the fact that Melksham and Bowerhill village are treated as being a single settlement within the Wiltshire Core Strategy for the purposes of planning.	Amend paragraph to read: “In contrast, rates of development at most Market Towns have met expectations and at Bradford on Avon, Calne, Malmesbury, Melksham <i>and Bowerhill,</i> Royal Wootton Bassett and Westbury anticipated levels of growth have been exceeded over the first half of the plan period. Land has been available and some additional sites granted consent by planning appeals. Over the same interval, scales of development within rural areas in many places have also exceeded those anticipated by the WCS.”	Minor
PC11	Paragraph 4.49		Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	Amend paragraph to read: “Chippenham however is now likely to exceed now has the potential to meet the minimum scale of growth anticipated in the WCS by <i>delivery of</i> higher rates of house building in the last half of the plan period compared to much lower rates over recent years. This will come about in large part as a result of significant allocations for housing development made in the Chippenham Site Allocations Plan <i>as well as other significant permissions at the town.</i> ”	Minor
PC12	Paragraph 4.52		Factual update to reflect the latest published Housing Land Supply	Amend the paragraph to read:	Main

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

			Statement (March 2018) and to reflect Proposed Changes 34, 39, 43 and 49, that propose higher densities on site allocations to make best use of land.	“Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately 800 1,100 dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 4,220 1,247 .”	
PC13	Paragraph 4.53		Factual update to reflect the latest published Housing Land Supply Statement (March 2018) and Proposed Changes 34, 39, 43 and 49.	Amend paragraph to read: “One main reason for a shortfall in land supply is the complexity and consequent delay developing Ashton Park, a south-eastern extension to the town. 4,600 1,350 dwellings will be built on this site in the plan period and a further 4,000 1,250 post-2026; rather than first envisaged that the whole of the allocation would have been completed in the plan period. This broadly equates can be seen to account for 1,000 of the 4,220 1,247 dwelling shortfall.”	Minor
PC14	Paragraph 4.63		Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	Amend the paragraph to read: “The South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire.”	Minor
PC15	Paragraph 4.64		Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	Amend the paragraph to read: “Salisbury is the Principal Settlement within the HMA. It is intended to be the primary focus for development, providing significant levels of jobs and homes. Two site allocations of more than 500 dwellings provide a large source of supply are important to ensuring there is a surety of supply to the end of the Plan period to ensure and that the City achieves the role set out in the spatial strategy: Churchfields Fugglestone Red and land at Netherhampton Road. The first is a strategic site allocated in the WCS. The latter of these, land at Netherhampton Road, is an allocation of the Plan.	Minor

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

PC16	Paragraph 4.66		Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	<p>Amend paragraph to read:</p> <p><u>“One of the WCS strategic allocations, namely</u> Churchfields, is a strategic mixed-use site that Core Policy 20 of the WCS requires to deliver 1100 dwellings by 2026. To be developed, this site requires substantial employment uses to decant and is now expected to commence later than envisaged and much less land for new housing will be available before <u>beyond the current plan period of</u> 2026. It is a complex regeneration project that will take time to deliver and will require other sites to enable existing businesses to relocate.</p>	Minor
PC17	Paragraph 4.68		Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	<p>Amend paragraph to read:</p> <p>“Recognising the scale of the site, a generous lead in time is provided for the delivery of Netherhampton Road. The site is not expected to contribute to housing delivery for several years whilst work is carried out to masterplan the site and develop mitigation measures. In the meantime, supply from major schemes such as Fugglestone Red and Longhedge will ensure sufficient supply. Churchfields <u>Fugglestone Red</u> and <u>the</u> Netherhampton Road sites will deliver new homes alongside each other toward the end of the plan period.”</p>	Minor
Chapter 5 Housing Site Allocations					
PC18	Policy H1, Table 5.2; Policy H2, Table 5.3; Policy H.3, Table 5.4		<p>Update heading in tables to ensure that the number of dwellings per allocation is referred to in a consistent manner throughout the Plan.</p> <p>Amend text to reflect Table headings in Chapter 4, which refers to ‘Approximate dwellings’.</p>	<p>Amend title in third column in tables as follows:</p> <p>“No of dwellings” <u>“Approximate number of dwellings”</u></p>	Minor

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PC19	Para 5.4	ID: 395940 Rep: 2968, 2973	<p>Improve clarity.</p> <p>Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites, as well as groundwater.</p>	<p>Amend paragraph after second sentence to read:</p> <p>“Most sites proposed are of more than one hectare, <u>and</u> will therefore require <u>a</u> flood risk assessment (<u>incorporating an assessment of the predicted effects of climate change</u>) in order to ensure that there is no increase in risk of flooding on site and elsewhere, and will comply <u>thereby complying</u> with Core Policy 67 (Flood Risk) with regard to flood risk <u>and national policy</u>. <u>In addition, sites proposed within Source Protection Zones (SPZ) 1 and 2 will need to comply with Core Policy 68 (Water Resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency’s groundwater protection policy.</u>”</p>	Minor
PC20	Paragraph 5.4	ID: 395940 Rep 2967, 2968, 2969	<p>Improve clarity.</p> <p>Additional text highlights the need to address climate change and drainage for all development sites.</p>	<p>Insert text at the end of paragraph 5.4:</p> <p><u>“Consideration should be given to the predicted effects of climate change and proposals should allocate appropriate buffer strips where there is no adjacent built development. Natural flood management should be incorporated into planning proposals to mitigate new and existing developments.”</u></p>	Minor
PC21	New paragraph after para 5.4	ID: 395940 Rep: 2995, ID: 382216 Rep: 3018	<p>In response to comments from Environment Agency and Natural England about the River Avon SAC and phosphate load.</p>	<p>Insert new paragraph to read:</p> <p><u>“The Environment Agency and Natural England advise that all development within the River Avon catchment should be ‘phosphate neutral’ for an interim period. This is to guard against a further worsening of the condition of the River Avon Special Area of Conservation (SAC). An annex of the Nutrient Management Plan will explain measures to help deliver phosphate neutral development and how they will be delivered. Some measures are capable of being delivered as a part of housing development. Off-site measures are supported by</u></p>	Minor

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				<u>Community Infrastructure Levy and there is also scope to improve the efficiency of sewage treatment works. The definition of 'phosphate neutral' is the additional phosphorus load generated by new development after controls at source, reduction by treatment and/or off-setting measures leading to no net increase in the total phosphorus load discharged to the River Avon SAC. Core Policy 69 (Protection of the River Avon SAC) applies.</u>	
PC22	Paragraph 5.5	ID: 403793 Rep: 1641	In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the Council and ensure appropriate consideration is given to heritage assets and their settings consistent with the national policy.	Amend existing paragraph 5.5 to read: "Development has the potential to affect the significance of a range of heritage assets within or beyond site boundaries. <u>The Council has produced a high-level Heritage Impact Assessment (HIA) to support the Plan. The HIA identifies and assesses the significance of heritage assets (and their settings) on sites where such matters will be particularly important considerations to address in subsequent planning applications.</u> Where necessary, <u>further detailed a site-specific</u> heritage impact assessments will prescribe measures which will need to be incorporated as part of a scheme in order to protect them, including the importance of their settings. The determination of planning applications will follow the approach set out in National Planning Policy Framework (paragraphs 131-135) and satisfy requirements of Core Policy 58 (Ensuring the Conservation of the Historic Environment) of the WCS. This should include archaeological assessment where necessary."	Minor
PC23	Paragraph 5.11	ID: 395940 Rep: 2967, 2968, 2969	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address drainage for all	Amend paragraph 5.11 to read: "As appropriate, additional evidence will need to be prepared at a level of detail to support a planning application. Such new evidence can be used as a material consideration when considering a specific planning application. In many cases, particularly important items are referred to for each allocation. Such evidence may	Minor

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			development sites and clarify the nature of flood risk assessment. Additional change for consistency with PC22.	include, but is not limited to, a Landscape and Visual Impact Assessment, <u>site specific</u> Heritage Impact Assessment, Biodiversity Report, Surface Water Management Plan (<u>incorporating a site wide, comprehensive drainage strategy</u>), Flood Risk Assessment (<u>incorporating an assessment of the predicted effects of climate change</u>), and Transport Statement.”		
East Wiltshire Housing Market Area						
Housing Allocation H1.1 Empress Way, Ludgershall						
Page 254	PC24	Paragraph 5.21	ID: 1126553 Rep: 953	In response to concerns raised by Southern Water to provide clarity on water infrastructure and due to proximity of sewage treatment works.	Add text at the end of paragraph: <u>“Development will provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider. Development layout should be informed by an odour assessment, to be undertaken in consultation with Southern Water.”</u>	Minor
	PC25	Paragraph 5.19	ID: 758096 / 758092 Rep: 3082	To provide clarity on how timing of access point will be determined.	Amend last sentence of paragraph 5.19 to read: “Transport assessment will <u>determine the trigger point for the delivery of the access via Simonds Road and</u> inform detailed measures to mitigate impacts on the local road network, including the A342 Andover Road, Memorial Junction and the capacity of the signals on the nearby railway bridge.	Minor
	PC26	Paragraph 5.20	ID: 758096 / 758092 Rep: 3082	Improved clarity. To clarify the position should land for a school not be required.	Insert additional text at the end of paragraph 5.20: <u>“In the event that land for a school is not required within a period to be agreed with the Council’s Education Department, then the land will be returned and thereby revert to agricultural use.”</u>	Minor
	PC27	Policy H1.1	ID: 382216 Rep: 3018	Improves context.	Add fifth bullet point to policy text:	Minor

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			In response to comment from Natural England to ensure sufficient weight is given to public rights of way.	<ul style="list-style-type: none"> "<u>the retention and enhancement of public rights of way LUDG1, LUDG2 and LUDG34 through the development of the site.</u>" 	
PC28	Paragraph 5.21	ID: 395940 Rep: 2967, 2968, 2969	Insert additional wording to address concerns raised by the Environment Agency, highlighting the need for flood risk assessment and to address drainage for all development sites.	Amend paragraph to read: "The site design will be led by a strong landscape framework. Significant additional screening at the southern and eastern site boundaries would be required, along with landscaping and green infrastructure throughout the site as there are middle and long-distance views of the site from the south. The final design and layout should be informed by a Landscape and Visual Impact Assessment-, <u>Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy.</u> "	Minor
Housing Allocation H1.2 Underhill Nursery, Market Lavington					
PC29	Paragraph 5.27	ID: 1134169 Rep: 2656	Improve clarity. The current wording is not specific and would encompass the retention of the Leylandii trees on site. This would not contribute to landscape or biodiversity objectives.	Insert additional sentence after third sentence to paragraph 5.27: "Mature trees and hedgerows within the site should be retained and protected as priority habitat. <u>The existing belt of Leylandii trees may be removed to facilitate development and enhance the character of the site.</u> Moreover, all new planting..."	Minor
PC30	Paragraph 5.25	ID: 1130978 / 1131263 Rep: 1951 ID: 983136 Rep: 2656 ID: 1104618	Increase the size of the allocation to improve vehicular access and to allow for strategic landscaping to improve edge to settlement.	Extend the boundary of the allocation, as set out in Annex A.	Main

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		Rep: 1734 ID: 1130331 Rep: 1735				
North and West Housing Market Area						
Page 256	PC31	Paragraphs 5.44, 5.49, 5.55, 5.62, 5.71, 5.76 and 5.82.	ID: 382216 Rep: 3018-	Improve clarity. The current title of the <i>Trowbridge Recreation Management Mitigation Strategy</i> , implies it is solely concerned with recreation and not habitat related matters. Amend title to reflect contents of Strategy.	Amend title of Trowbridge Recreation Management Mitigation Strategy to read: <u>"Trowbridge Bat Mitigation Strategy"</u>	Minor
	PC32	Paragraph 5.44		Factual update to appropriately reflect the strategic importance of: a) delivering a new primary school; and b) ensuring that new school capacity is delivered in a timely and effective manner to cater for increased pupil numbers.	Amend the 2 nd bullet point to read: "Education: development will increase the number of pupils needing primary school places. A local lack of capacity across the town affects proposals allocated for development. With the majority of proposed housing being directed south/south-west of the town, the evidence points directly to the need for a new primary school in this area. <u>Moreover, any new primary school will need to be delivered as a strategic priority with development occurring on other allocations in a timely manner to ensure that sufficient primary school capacity is available to serve the local community.</u> Therefore, in addition to land reserved for one new school, funding contributions will be sought from developers to help provide adequate capacity."	Minor
Housing Allocation H2.1 Elm Grove Farm, Trowbridge						
	PC33	Policy H2.1, Figure 5.5,	ID: 901939 / 901806 Rep: 1816	To amend site boundary and include adjoining land within the Council's ownership, but in trust by the National Playing Fields Association	Amend the boundary of the allocation as set out in Annex B; And first sentence of Policy H2.1 and paragraph 5.46 to read:	Minor

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	Paragraph 5.46		(operating as Fields in Trust charity), to allow for the relocation of the primary school on this land and enhanced community recreational facilities as part of the wider development. The extended site will enable the delivery of the school early in the site's development consistent with the strategic priority identified in PC32.	"Approximately 44.33 or <u>17.78</u> ha of land at Elm Grove Farm..."	
PC34	Policy H2, Policy H2.1, Paragraph 5.46	ID: 901939 / 901806 Rep: 1816	To reflect the increase in site area consistent with PC33 and clarify the requirements for the use of the land, and associated provision of open space facilities. The increased site area has allowed for an uplift in housing numbers maximising the efficient use of land.	<p>Amend Policy H2 to replace 200 dwellings in Table 5.3 for Elm Grove Farm with 250 dwellings, and first sentence of paragraph 5.46.</p> <p>Amend first bullet point of Policy H2.1 to read:</p> <ul style="list-style-type: none"> • "Approximately 200 <u>250</u> dwellings" <p>Amend 2nd bullet point of Policy H2.1 to read:</p> <ul style="list-style-type: none"> • "At least 1.8ha of land for a two-form entry primary school along with playing pitches <u>on land owned by the Council, but held in Trust (the existing Queen Elizabeth II Field);</u>" <p>Amend 4th bullet point of Policy 2.1 to read:</p> <ul style="list-style-type: none"> • "A <u>significantly improved and</u> consolidated public open space area incorporating and augmenting <u>adjacent to</u> the existing Queen Elizabeth II Field <u>to provide a play area and junior level sports pitches for local community teams to utilise;</u>" 	Main

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PC35	Policy H2.1 6th bullet	ID: 901939 / 901806 Rep: 1816	Factual update to reflect the need for cycling and walking routes to integrate with the adjoining employment area. .	Amend the 6th bullet point to read: <ul style="list-style-type: none"> " New cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site, <u>and the White Horse Business Park.</u>" 	Minor
PC36	Paragraph 5.47	ID: 395940 Rep: 2967, 2968, 2969	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.	Insert additional text at the start of paragraph 5.47: <u>"Proposals to develop the site will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy."</u> .	Minor
PC37	Paragraph 5.50		In response to comments from Heritage England to ensure the setting of assets is considered and to recognise in accordance with national policy, further detailed assessments of heritage would likely be required to guide layout and design at the planning application stage.	Amend paragraph to read: "Access to the site would need to be holistically planned with upgrades required to Drynham Lane, along with the construction of a connection to the A363 designed as a through-route anticipating future traffic growth. New and improved walking and cycling routes to existing and planned local services would encourage future residents to use sustainable forms of transport. The site has a medium potential for archaeological remains. Therefore any subsequent planning application should be informed by an archaeological assessment. In addition, development will need to minimise the potential to harm the significance of the Grade II Listed Drynham Lane Farmhouse <u>and, where appropriate, its setting.</u> Measures may also be necessary to prevent potential noise pollution from the existing main road and railway. These considerations should be addressed through the process of detailed design and layout which should be informed through a Heritage Impact Assessment. <u>by detailed assessments (including heritage) to support any subsequent planning application.</u> "	Minor

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Housing Allocation H2.2 Land off the A363 at White Horse Business Park, Trowbridge					
<p>PC38</p>	<p>Figure 5.6 Paragraph 5.52</p>	<p>ID: 1114350 Rep: 18 -</p> <p>ID: 1115490 / 1115452 Rep: 21</p> <p>ID: 1120664 / 1115452 Rep: 131</p> <p>ID: 1125881 Rep: 723 ID: 403859 Rep: 1457</p> <p>ID: 1130978 / 1130975 Rep: 1832</p>	<p>Factual update.</p> <p>Amend site boundary to reflect land ownership and also to exclude site that has now been developed.</p>	<p>Amend the boundary of the allocation as set out in Annex C;</p> <p>And first sentence of paragraph 5.52 to read:</p> <p>"Approximately 25.62 18.96 ha of land off the A363 south-west of the White Horse Business park is allocated for the development"</p>	<p>Minor</p>
<p>PC39</p>	<p>Policy H2, Table 5.3; Paragraph 5.52</p>	<p>ID: 8090227 / 1132859 Rep: 3074</p> <p>ID: 1137984 / 1130975 Rep: 3142-</p>	<p>Improve clarity.</p> <p>To maximise efficient use of land consistent with heritage and ecological constraints increase the number of dwellings to approximately 225 units.</p>	<p>Amend Policy H2 to replace 150 dwellings in Table 5.3 for Land off the A363 at White Horse Business Park, Trowbridge with 225 dwellings.</p> <p>And amend first sentence of paragraph 5.52 as follows:</p> <p>"...land off the A363 south-west of the White Horse Business park is allocated for the development of approximately 150 225 dwellings, as identified on the Policies Map."</p>	<p>Main</p>

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PC40	New para after 5.56	ID: 403792 Rep: 1642	In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the Council and ensure appropriate consideration is given to heritage assets and their settings consistent with national policy.	Insert new paragraph after paragraph 5.56 to read: <u>“As identified in the Council’s Heritage Impact Assessment, the site is an historic agricultural landscape and comprises a cluster of historic farmsteads where the farm houses and ancillary buildings may be susceptible to setting change. This includes Kings Farmhouse (Grade II listed), Willow Grove (Grade II listed), Little Common Farm (non-designated asset), Manor Farmhouse (Grade 2 listed) and Woodmarsh Farm (non-designated asset). An area of the site also includes a Baptist cemetery with an ornamental gateway structure (Grade II listed) and curtilage listed perimeter walls. The archaeological potential of the site is likely to be high. At the planning application stage, the layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting in order to minimise harm.”</u>	Minor
PC41	Existing Paragraph 5.56	ID: 395940 Rep: 2967, 2968, 2969	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.	Amend paragraph to read: “Proposals would need to provide for a high quality, sustainable development that enhances a key gateway approach to the town, whilst protecting the integrity of North Bradley as a village. <u>In addition, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.”</u>	Minor
Housing Allocation H2.3 Elizabeth Way, Trowbridge					
PC42	Figure 5.7, Paragraph 5.58	ID: 392036 / 1126545 Rep: 935	Factual update. Amend site boundary, as identified incorrectly, to align with Elizabeth Way Relief Road.	Amend the boundary of the allocation as set out in Annex D. And first sentence of paragraph 5.58 to read: “Approximately 46.33 <u>21.24</u> ha of land to the South West of Elizabeth Way is allocated for the development”	Minor

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		ID: 1131752 / 1131750 Rep 2119			
PC43	Policy H2 Table 5.3, Paragraph 5.58	ID: 392036 / 1126545 Rep: 935 ID: 1131752 / 1131750 Rep: 2119 Rep 2126 ID: 1131752 / 1131750 Reps 890 ID: 1054271 Rep: 934 ID: 392036 / 1126545 / 95984063 0 ID: 895670 Rep 1915	To maximise efficient use of land, increase the number of dwellings to approximately 355 units.	Amend Policy H2 to replace 205 dwellings in Table 5.3 for Elizabeth Way, Trowbridge with 355 dwellings. Amend first sentence in paragraph 5.58 as follows: "... land to the South West of Elizabeth Way is allocated for the development of approximately 205 355 dwellings, as identified on the Policies Map."	Main
PC44	Add to beginning of para 5.64	ID: 403792 Rep: 1643	In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the Council and	Add text to beginning of paragraph 5.64: <u>"The site comprises historic field boundaries and has high archaeological value. It is adjacent to Trowbridge (Hilperton</u>	Minor

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			ensure appropriate consideration is given to heritage assets and their settings consistent with national policy.	<u>Road) Conservation Area and to Fieldways Highfield (Grade II* listed), a country house. Fieldways Highfield and its setting will need to be conserved in a manner appropriate to its significance. The relationship between development proposals and these heritage assets will need to be rigorously addressed through detailed design including provision for open greenspace in any layout.</u>	
PC45	Paragraph 5.63	ID: 395940 Rep: 2967, 2968, 2969	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.	Amend paragraph to read: "An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road. Consideration of drainage patterns and flood risk from all sources would need to inform any subsequent layout. In addition, surface water attenuation measures and improvements to existing on-site water infrastructure would need to be provided to support a comprehensive development of the site. <u>Proposals will therefore need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters of layout and design.</u> "	Minor
Housing Allocation H2.4 Church Lane, Trowbridge					
PC46	Figure 5.8, Paragraph 5.67	ID: 1129173/ 402467 REP :1523	In response to Natural England, extend site boundary to include land between the current boundary and the river, which allow for land to be used to mitigate bat impacts	Amend the boundary of the allocation as set out in Annex E. And first sentence of paragraph 5.58 to read: "Approximately 3.72 5.93 ha of land at Church Lane is allocated for the development of approximately 45 dwellings, as identified on the Policies Map."	Minor
PC47	Replace Paragraph 5.68 with new text	ID: 403797 Rep: 1644	In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the Council and	Replace 5.68 with new text: "Development proposals would need to ensure that the significance and setting of the Grade II Listed St John's Church would be	Minor

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Page 263			ensure appropriate consideration is given to heritage assets and their settings consistent with national policy.	appropriately protected. To achieve this objective, access to the site would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane.” <u>“The site is adjacent to the Church of St John (Grade II listed), associated church school and schoolmasters house and is enclosed from the road by two rows of buildings at White Row Hill and Frome Road including Rose Villa (Grade II listed), 344 Frome Road (Grade II listed) and paddocks. There are key views across the site to St John’s spire from Southwick Country Park. The site comprises the degraded fragmentary remains of a post medieval water meadow system. The layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting to minimise harm. Access to the site must be sensitively designed and accommodated in manner that minimises harm to heritage assets.”</u>	
	PC48	Paragraph 5.67	ID: 395940 Rep: 2967, 2968, 2969	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.	Add text at the end of paragraph 5.67 as follows: “...It is an open site that slopes to the south-west towards the Lambrok Stream. <u>As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the south-west margins of the site to slow the flow of surface water into the Lambrok Stream.</u> ”
Housing Allocation H2.5 Upper Studley, Trowbridge					
PC49	Policy H2, Table 5.3;	ID: 395553 / 901806	To maximise efficient use of land and in response to representation	Amend Policy H2 to replace 20 dwellings in Table 5.3 for Upper Studley, Trowbridge with 45 dwellings.	Main

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	Paragraph 5.73	Rep: 1657	increase the number of dwellings to approximately 45 dwellings, and correct site area	Amend first sentence of paragraph 5.73 to read: "Approximately 2.33 2.27 ha of land at Church Lane is allocated for the development of approximately 20 45 dwellings, as identified on the Policies Map."	
Page 264	PC50	Paragraph 5.73	ID: 395940 Rep: 2967, 2968, 2969 Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.	Add text to end of paragraph 5.73 as follows: "...The land slopes towards the stream and is bound to the south by tall, mature poplar trees. <u>As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the southern margins of the site to slow the flow of surface water into the Lambrok Stream.</u> "	Minor
	Housing Allocation H2.6 Southwick Court, Trowbridge				
	PC51	Paragraph 5.78	ID: 403792 Rep: 1645 In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the Council and ensure appropriate consideration is given to heritage assets and their settings consistent with the national policy.	Amend paragraph 5.78 to read: "The area is of historic significance as water meadows (<u>non-designated heritage asset</u>) associated with the <u>Grade II* Listed Southwick Court Farmstead that lies to the south of the site. The Southwick Court Farmstead is a heritage asset of significant importance. It is a medieval, manorial farmstead that includes a farmhouse, gatehouse and bridge juxtaposed with later post-medieval/modern additions surrounded by a moat.</u> An essential objective of detailed design will be to minimise harm to its significance. The setting to this heritage asset will be preserved, to the greatest extent possible, informed by <u>the Councils Heritage</u>	Minor

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				<p><u>Impact Assessment</u> and the results of <u>further</u> more detailed <u>heritage assessment work to support any subsequent planning application.</u> Heritage Impact Assessment. Taking account of the weight attached to the significance of the assets, <u>alone and in combination,</u> any residual harm would require a clear and convincing justification <u>within any subsequent planning application</u> and should not be substantial. The social, <u>environmental</u> and economic advantages of the development, including the provision of homes <u>along with significant improvements to biodiversity and provision of open space will</u> achieve substantial public benefits. A <u>sensitively designed,</u> comprehensive development scheme will need to <u>minimise harm by ensuring</u> ensure that new homes are directed to the east of the Lambrok Stream <u>and built in a manner that respects both the topography of the land and existing urban form to the immediate north.</u> Land to the west may become either formal or informal open space or remain in agricultural use, but will not be developed for new homes. The character of the area will therefore help to retain the high significance of <u>Southwick Court and associated</u> this heritage assets.”</p>	
PC52	Paragraph 5.79	ID: 395940 Rep: 2967, 2968, 2969	<p>Improve clarity.</p> <p>Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.</p>	<p>Add text to end of paragraph 5.79, as follows:</p> <p>“...The Lambrok Stream and its respective flood plain should be enhanced as a local amenity feature of the site in conjunction with development proposed at Upper Studley above. <u>As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the northern margins of</u></p>	Minor

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				<u>the site to slow the flow of surface water into the Lambrok Stream and associated field drainage systems.”</u>	
Warminster					
PC53	New paragraph under 5.87	ID: 903251 Rep: 2396	Improve clarity. Highways England has raised that there may be cumulative impacts on the A36 arising from proposed housing allocations at Warminster and this requires consideration.	Add new paragraph under 5.87 as follows: ” <u>Developments will be required to address any direct or indirect cumulative impacts on the A36.</u> ”	Minor
PC54	Paragraph 5.87	ID: 706891 Rep 1512 ID: 397127 Rep: 2911 ID: 395940 Rep: 2990	In response to comments from Environment Agency and Natural England about the River Avon SAC and phosphate load.	Amend paragraph 5.87 as follows: "Development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss/damage. However, the scale of development is within the thresholds set down in <u>As such,</u> a Nutrient Management Plan <u>seeks to</u> for the river that avoids the likelihood of adverse effects. Nonetheless, impacts are kept under review and this situation may change. <u>For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC.</u> Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in the annex to the Nutrient Management Plan.”	Minor
Housing Allocation H2.7 East of the Dene, Warminster					
PC55	Paragraph 5.89	ID: 403792 Rep: 1646	In response to comments from Heritage England. To reflect the	Amend paragraph 5.89 to read:	Minor

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			Heritage Impact Assessment undertaken by the Council and ensure appropriate consideration is given to heritage assets and their settings consistent with the national policy.	<p><u>“Bishopstrow Conservation Area encloses the site on two sides and there are a number of historic buildings within close proximity to the site boundary, including Bishopstrow House (Grade II listed) and its designed landscape, as well as Bishopstrow Home Farm (non-designated heritage asset). The archaeological potential on the site is high.</u> The main access will be from Boreham Road but the south-west part of the site is considered to be unsuited to built development because of its sensitivity in heritage and landscape terms. This land may remain in agricultural use or becomes either formal or informal open space, but will be undeveloped so the character of the area continues to preserve the significance of heritage assets.</p>	
PC56	Paragraph 5.90	ID: 403792 Rep: 1646	<p>Improve context.</p> <p>In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the Council and ensure appropriate consideration is given to heritage assets and their settings consistent with the national policy.</p>	<p>Amend paragraph 5.90 to read:</p> <p><u>“The design and layout of the site will need to give great weight to conserving the significance of these heritage assets to minimise harm. Access to the site must be accommodated in a sensitive manner.</u> The design of an the access point should also minimise <u>and mitigate</u> the loss of the high wall that is characteristic of this approach to the town. Secondary access, in particular for cycling and walking, should also be sought through The Dene and improvements should be made to footpath WARM40.”</p>	Minor
PC57	Paragraph 5.91	ID: 403792 Rep: 1646 ID: 395940 Rep: 2967, 2968, 2969	<p>In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the Council and ensure appropriate consideration is given to heritage assets and their settings consistent with the national policy.</p> <p>Additional wording to address concerns raised by the Environment</p>	<p>Amend paragraph 5.91 to read:</p> <p>“The site has a number of heritage and related landscape considerations. A sensitively designed scheme should be brought forward which has been informed by a a <u>the Council’s</u> Heritage Impact Assessment and <u>further detailed site specific assessments required to support the planning application.</u> <u>Development will need to</u> appropriately responds to the character and location<u>al context</u> of the site and <u>robustly</u> respects the significance of the following heritage assets:</p>	Minor

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			Agency, highlighting the need to address flood risk for all development sites.	<ul style="list-style-type: none"> Listed Buildings in the vicinity of the site, including Bishopstrow House Bishopstrow Conservation Area Views from Battlesbury Camp hillfort <p><u>In addition, development proposals will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change)."</u></p>		
Housing Allocation H2.8 Bore Hill Farm, Warminster						
Page 268	PC58	Policy H2 Table 5.3 Paragraph 5.93	ID: 1137935/ 556489 Rep: 3061	Factual update. Amend site boundary to reflect land available for development and to maximise efficient use of land increase the number of dwellings.	Amend the boundary of the allocation as set out in Annex F. And first sentence of paragraph 5.88 to read: "Approximately 4.47 4.83 ha of land at Bore Hill Farm/Bradley Road, as shown on the Policies Map..."	Main
	PC59	Paragraph 5.94	ID: 395940 Rep: 2967, 2968, 2969	Improve clarity. Insert additional wording to: address concerns raised by the Environment Agency, highlighting the need to address flood risk; and address issues associated with the waste management facility.	Amend paragraph to read: "The site is formed of land between the A36 and Deverill Road which lies adjacent to the Bore Hill Farm bio-digester. <u>Considering the site context, any subsequent development proposals (e.g. layout and screening) will need to take account of potential issues associated with the operational waste management facility, these may include: noise, dust and odour.</u> There is some limited screening on the north boundary with existing development at Bradley Close and Ludlow Close. Additional landscape screening at the site boundaries would be required to preserve and maintain the living conditions of adjoining residential dwellings. Vehicular access will be provided from Deverill Road, and connection to and improvement of public right of way WARM60 should be provided. <u>In addition, development proposals will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change)."</u>	Minor

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Housing Allocation H2.9 Boreham Road, Warminster					
PC60	Paragraph 5.99	ID: 403792 Rep 1646	<p>Improve clarity.</p> <p>Insert additional wording to reflect the advice provided by Historic England.</p>	<p>Amend paragraph to read:</p> <p>“Whilst situated outside the Bishopstrow Conservation Area, the site is considered to lie within the setting of this designated heritage asset. Development of the site would therefore need to respond positively to its surroundings and have due regard to the special character or appearance of the Conservation Area. A Heritage Impact Assessment <u>In line with national policy, an assessment of heritage assets and their significance (including the contribution made by their setting)</u> would be required in order to support any subsequent proposals, including the design of mitigation measures. The setting of heritage assets will be protected so as to ensure, as far as practicable, there will be no substantial harm to their significance.”</p>	Minor
PC61	Paragraph 5.100	ID: 395940 Rep: 2967, 2968, 2969	<p>Improve clarity.</p> <p>Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.</p>	<p>Delete paragraph 5.100 and replace with text to read:</p> <p>“Development of the site would need to be supported and informed by a Drainage Strategy and water infrastructure capacity assessment. Where necessary, details relating to the reinforcement of existing foul/storm water drainage arrangements would need to be submitted with any subsequent planning application. Drainage measures for the attenuation and management of surface water would need to be capable of achieving greenfield, or better, infiltration rates.</p> <p><u>Parts of the site lie within Flood Zones 2 and 3. Therefore development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy and water infrastructure capacity assessment. Where necessary, details relating to the reinforcement of existing foul/storm water drainage</u></p>	Minor

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				<u>arrangements will need to be submitted with any subsequent planning application.</u>	
Housing Allocation H2.10 Barbers Farm, Chapmanslade					
PC62	Paragraph 5.103	ID: 382216 Rep: 3018	Increased clarity. Ensure sufficient weight is given to public rights of way in the allocations to address concerns raised by Natural England.	Add text to the end of paragraph 5.103 to read: <u>“Public right of way CHAP14 runs along the northern boundary of the site. This will be retained and enhanced through the development of the site.”</u>	Minor
PC63	Paragraph 5.103	ID: 395940 Rep: 2967, 2968, 2969	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.	Add text to the end of paragraph 5.103, after PC63:: <u>“. Considering the size of the site, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.”</u>	Minor
Housing Allocation H2.11 The Street, Hullavington					
PC64	Paragraph 5.105	ID: 1133384 / 825048 Rep: 2535	Factual update. Amend reference to the school area to refer to the correct size of 0.2 hectares.	Amend text to read: “Approximately 2.44ha of land adjacent to the Primary School is allocated for the development of approximately 50 dwellings and 0.25 <u>0.2</u> ha to allow for the expansion of the primary school, as shown on the Policies Map.”	Minor
PC65	Paragraph 5.107	ID: 1133384 / 825048 Rep: 2535	Factual update. Remove first and second sentences which refers to land to the north of the proposed allocation.	Amend text to read: “A sufficient buffer should be provided to the watercourse to the north of the site to safeguard the function of the tributary to the River Gauze. It also provides options to deliver public open space and biodiversity enhancement. Mature hedgerows and trees would be retained and planting Barberry will enhance habitat for the Barberry Carpet moth, a priority species of the BAP. Development	Minor

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				would need to retain the historic footpath through the site to the surrounding countryside. Moreover, footpaths HULL29, HULL1 and HULL33 should be retained and improved as part of the development of the site.”	
PC66	Paragraph 5.107	ID: 395940 Rep: 2967, 2968, 2969	<p>Improve clarity.</p> <p>Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites, as well as groundwater.</p>	<p>Additional text to be added to the end of the paragraph:</p> <p><u>“Considering the size of the site any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design. In addition, as the site lies within Groundwater Protection Zones 1 and 2, development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency’s groundwater protection policy.”</u></p>	Minor
Housing Allocation H2.12: East of Farrells Field, Yatton Keynell					
PC67	Figure 5.16 Paragraph 5.109	ID: 983136 Rep: 2670	<p>Factual update.</p> <p>The site boundary is identified incorrectly and should be amended to remove the track running along the western boundary of the site.</p>	<p>Amend the boundary of the allocation as set out in Annex G.</p> <p>And first sentence of paragraph 5.109 to read:</p> <p>“Land East of Farrells Field, Yatton Keynell is allocated for the development of approximately 30 dwellings on approximately 4-3 <u>1.2</u>ha of land, as shown on the Policies Map.”</p>	Minor
PC68	Paragraph 5.109	ID: 395940 Rep: 2967, 2968, 2969	<p>Improve clarity.</p> <p>Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites, as well as groundwater.</p>	<p>Amend paragraph after first sentence, as follows:</p> <p><u>“Considering the size of the site any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design. In addition, as the site lies within Groundwater Protection Zone 2</u></p>	Minor

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				<u>development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency's groundwater protection policy.</u> It is <u>The site</u> is well located with regard to local services and facilities. The site <u>It is</u> in agricultural use and represents the continuation of recent development in this part of the settlement."	
PC69	Paragraph 5.110		Factual update. The site boundary is to be amended to remove the track running along the western boundary of the site. Consequential change to removed text relating to woodland corridor should also be removed.	Amend text to read: "A woodland corridor along the western boundary should be retained as a wildlife corridor. Retention of the existing boundary vegetation on site would provide screening to reduce the effect on adjacent visual receptors and be in keeping with the existing landscape character. Access would be taken from Farrell Fields and the possibility to link to adjacent footpaths should be explored."	Minor
Housing Allocation H2.13: Ridgeway Farm, Crudwell					
PC70	Figure 5.17, paragraph 5.112	ID: 1134691 / 861292 Rep: 2820	For clarity. The site boundary be amended to meet the northern field boundary and allow for landscaping.	Amend the boundary of the allocation as set out in Annex H. And first sentence of paragraph 5.112 to read: "Approximately 4.7 <u>2.03</u> ha of land at Ridgeway Farm, Crudwell is allocated for the development of approximately 50 dwellings as shown on the Policies Map."	Minor
PC71	Paragraph 5.112	ID: 395940 Rep: 2967, 2968, 2969	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites, as well as ground water.	Insert new second sentence and amend third as follows: " <u>Considering the size of the site any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design. In addition, as the site lies within Groundwater Protection Zone 1 development proposals will need to comply with Core Policy</u>	Minor

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				<u>68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency’s groundwater protection policy. It is <u>The site is nonetheless</u></u> in a location that has the capacity to accommodate change from an environmental and landscape perspective.”	
Housing Allocation H2.14: Court Orchard/Cassways, Bratton					
PC72	Policy H2, Table 5.3; Paragraph 5.116	<p>ID: 1126059 Rep: 19</p> <p>ID: 1125220 Rep: 499</p> <p>ID: 1125255 Rep: 502</p> <p>ID: 1125408 Rep: 545</p> <p>ID: 1126059 Rep: 929</p> <p>ID: 1124313 Rep: 1024, 1028, 1019</p> <p>ID: 1129546</p>	In response to comments received raising concerns about the density of development. Subsequent discussion with promoters of the site suggests that the developable capacity should be reduced to 35 dwellings to allow for a more sensitively designed development.	<p>Amend Policy H2 to replace 40 dwellings in Table 5.3 for Land off B3098 adjacent to Court Orchard / Cassways, Bratton with 35 dwellings.</p> <p>Amend first sentence of paragraph 5.116 to read:</p> <p>“Approximately 1.35ha of land at Court Orchard/Cassways is allocated for the development of approximately 35 40 dwellings, as identified on the Policies Map.”</p>	Minor

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Page 274		Rep: 1612 ID: 704825 Rep: 1725, 1726, 1728, ,1745 ID: 1125770 Rep 2302 ID: 04313 Rep 2360 ID: 1133661 Rep 2631			
	C73	5.120	ID: 395940 Rep: 2967, 2968, 2969	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.	Amend paragraph to read: “Part of the site is susceptible to surface water flooding and a flood risk assessment will have to pay particular regard to this and inform the design of the site. <u>Considering the size of the site and the fact that part of the land is susceptible to surface water flooding, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.”</u>
South Housing Market Area					
PC74	Paragraph 5.128		Factual update. Amend incorrect reference in 1st bullet point to Salisbury Transport	Amend text to read: “Transport: development inevitably has impacts on the local transport network. The Salisbury Transport Strategy contains	Minor

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			Strategy as strategy has now been refreshed.	measures to support the scale of growth envisaged by the WCS. Plan allocations crystallise the pattern growth takes up to 2026 and refreshing the <u>refresh of the</u> Salisbury Transport Strategy <u>(2018)</u> will allow has reviewed the effectiveness of existing measures to be reviewed and proposes new ones to accommodate growth. Development will contribute to these wider network measures, where necessary, alongside measures that are implemented expressly as part of specific development proposals.”	
PC75	Paragraph 5.128		In response to comments from Natural England and Environment Agency regarding River Avon SAC.	Amend 3 rd bullet point in text as follows: <ul style="list-style-type: none"> • “Biodiversity: development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss / damage. However, the scale of development is within thresholds set down in a <u>As such, the</u> Nutrient Management Plan <u>seeks to</u> for the river that avoids the likelihood of adverse effects. Nevertheless, impacts are kept under review and this situation may change. <u>For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC.</u> Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in an annex to the Nutrient Management Plan.” 	Minor
Proposed NEW Housing Allocation H3.5 The Yard, Hampton Park, Salisbury					
PC76	Policy H3, Table 5.4	ID: 1131544 / 1131505	To include Omission Site OM003 The Yard, Hampton Park, Salisbury following consideration through site selection process (See Salisbury	Add new site to Policy H3 Table 5.4 under Salisbury Community Area: <u>“H3.x, The Yard, Hampton Park, 14 dwellings”</u>	Major

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		Rep: 2049-2053	Community Area Topic Paper, May 2018).		
PC77	New site allocation Policy H3.x	ID: 1131544 / 1131505 Rep: 2049-2053	To include Omission Site OM003 The Yard, Hampton Park, Salisbury following consideration through site selection process (See Salisbury Community Area Topic Paper, May 2018); consistent with PC77.	<p>After paragraph 5.149 add in new site allocation, as set out below.</p> <p>Insert heading:</p> <p><u>“H3.x The Yard, Hampton Park, Salisbury’</u></p> <p>Then insert site allocation figure as set out in Annex I;</p> <p>And insert following new paragraphs after.</p> <p>New para:</p> <p><u>“The Yard, Hampton Park is allocated for the development of approximately 14 dwellings on approximately 1.31 ha of land as shown on the Policies Map. The site lies adjacent to the settlement boundary and existing residential development, and would deliver a relatively small number of dwellings to help contribute towards the overall remaining indicative housing requirement for Salisbury.”</u></p> <p>New para:</p> <p><u>“The site has previously been used for agricultural storage purposes, is fairly flat, and comprises small parcels of rough grassland and a large disused agricultural storage building. Access to the site would be achieved via Neal Close.’</u></p> <p>New para:</p> <p><u>“This site is within the Special Landscape Area and in a rural fringe setting, adjacent to the Country Park. Access to the</u></p>	Minor

				<p><u>Country Park should be provided from this site and a robust landscape strategy and infrastructure is required to allow any development to appear as a natural extension to Hampton Park.</u></p> <p>New para:</p> <p><u>“Hedgerows around the site have the potential to be of importance for bat commuting and should be maintained where possible. There is a high population of slow worms to be translocated off site, which may be within the adjacent Country Park or other suitable location. Given the potential scale of the translocation, any receptor site will need to provide suitable habitat conditions for the species. Consideration also needs to be given to the site’s potential use as a roost site for barn owls.”</u></p> <p>New para:</p> <p><u>“As this site has previously been used for agricultural storage purposes, an assessment of the history and current condition of the site to determine the likelihood of the existence of contamination arising from previous uses should be carried to inform the planning application.”</u></p>	
Housing Allocation H3.1: Netherhampton Road, Salisbury					
PC78	Para 5.129		<p>Factual update:</p> <p>Amend incorrect reference to '70m contour' and to reflect the latest housing land supply statement published March 2018 (base date April 2017)</p>	<p>Amend 2nd and 3rd sentences of paragraph 5.129 to read:</p> <p>“All built development will be below the 75 70m contour and a scheme will include a country park and extensive planting.” Development of this site represents necessary growth to support the delivery of housing at Salisbury and thereby contribute towards maintain a 5-year housing land supply position within the South Wiltshire Housing Market Area.”</p>	Minor

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PC79	Para 5.136		<p>Factual update:</p> <p>The refresh of the Salisbury Transport Strategy has taken place so text needs to reflect this.</p>	<p>Add third sentence to read:</p> <p>“To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy <u>refresh (2018).</u>”</p>	Minor
PC80	Para 5.137 2nd sentence		<p>Factual update:</p> <p>The refresh of the Salisbury Transport Strategy has taken place so text needs to reflect this.</p>	<p>Amend second sentence to read:</p> <p>“This too would be undertaken in conjunction with an <u>the</u> updated Salisbury Transport Strategy <u>refresh (2018)</u> that takes account of planned strategic growth of Salisbury.”</p>	Minor
PC81	Policy H3.1	ID: 899628 / 899623 Rep: 1881	<p>For clarity:</p> <p>To give further clarification regarding any approval of a masterplan for the site, to be consistent with text of other policies where a masterplan is required.</p>	<p>Amend final sentence of Policy H3.1 to read;</p> <p>“Development will take place in accordance with a masterplan for the site approved by the Council <u>as part of the planning application process.</u>”</p>	Minor
PC82	Paragraph 5.138	ID: 395940 Rep: 2967, 2968, 2969	<p>Improve clarity.</p> <p>Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.</p>	<p>Amend paragraph to read:</p> <p>“A water infrastructure capacity appraisal will be needed to confirm the scope and extent of works to service new development. This should include the capacity of local sewer systems. A detailed flood risk assessment would be required in order to identify a set of appropriate sustainable drainage measures. <u>Bearing in mind the size of the site, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.</u> Sufficient land would need to be set aside for robust surface water management, to include a comprehensive Surface Water Drainage Scheme <u>measures (including a Sustainable Drainage System)</u> that results in run-off rates</p>	

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				equalling, or greater than <i>bettering</i> current greenfield infiltration rates.”	
Housing allocation H3.3: North of Netherhampton Road					
PC83	Replace para 5.144 with new text	ID: 403792 Rep: 1647	<p>Improve clarity.</p> <p>To address the comments submitted by Historic England and reflect the advice set out in Council Heritage Impact Assessment. Additional weight to be given to heritage assets.</p>	<p>Replace paragraph 5.144 as follows:</p> <p>“The area is sensitive in terms of the setting to the Cathedral and views towards it. Open space along the southern boundary will maintain views of the Cathedral spire travelling east. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Proposals would need to provide for a high quality, sustainable development that enhances an important approach to the City and provides links to nearby public rights of way.”</p> <p><u>“Long views to the historic City of Salisbury and Salisbury Conservation Area including the spire of Salisbury Cathedral (Grade I listed) are available across the site from the A3094, and at closer range from within the site itself. At the planning application stage, the layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting. Development proposals would need to be sensitively designed to ensure that views of the Spire are not significantly compromised. Design and layout would also need to positively address the objectives of the City of Salisbury Conservation Area Appraisal and Management Plan to minimise harm. Proposals would therefore need to provide for high quality, sustainable development that enhances an important approach to the City and provides links to nearby rights of way.”</u></p>	Minor
PC84	Paragraph 5.143	ID: 395940 Rep: 2967, 2968, 2969	<p>Improve clarity.</p> <p>Insert additional wording to address concerns raised by the Environment</p>	<p>Amend to read:</p> <p>“Land north of Netherhampton Road is allocated for the development of approximately 100 dwellings on 5.6ha of land as</p>	Minor

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			Agency, highlighting the need to address flood risk and drainage for all development sites.	shown on the Policies Map. It is reasonably well located with regard to services and facilities. The site is well contained in terms of visual impacts on the wider landscape. The extent of possible flood risks areas will need to be carefully surveyed so that development avoids them. <u>Part of the site lies within Flood Zone 2 and hence development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy to address issues of surface water flooding.</u>	
PC85	Paragraph 5.145	Rep: 2512	For clarity, in response to comments from Highways England.	Insert text at the end of paragraph 5.145: <u>“Transport assessment will be required to support any planning application and provision made for transport network improvements necessary to accommodate the scale of development.”</u>	Minor
Housing allocation H3.4: Land at Rowbarrow, Salisbury					
PC86	Paragraph 5.146	ID: 1130961/556489 Reps: 1823-1831	Factual update. Amend site boundary to reflect land available for development.	Amend paragraph 5.146 to read: “Land at Rowbarrow is allocated for the development of approximately 100 dwellings on 5.56 6.4ha of land as shown on the Policies Map.”	Minor
PC87	Figure 5.22	ID: 1130961/55489 Reps: 1823-1831	Factual update. Amend site boundary to exclude the woodland buffer as this is not within land available for development.	Amend Figure 5.22 as shown in Annex J.	Minor
PC88	Para 5.148		For clarity.	Amend paragraph 5.148 to read:	Minor

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			<p>Amend paragraph to add clarity regarding landscaping and open space requirements, as stated in the TEP Landscape Assessment.</p>	<p>“This is a sloping and quite prominent site. In combination with Heritage Impact Assessment, development will need to take place within a strong landscape framework that maintains and enhances the existing woodland belts affecting the site. Containment provided by the beech shelterbelt on the southern boundary should extend as a green corridor from the end of the shelterbelt eastwards towards the existing Rowbarrow housing development and woodland around the Milk & More Salisbury Depot. <u>This green corridor should include copses, groups of trees and individual specimen trees. The arrangement of any proposed development and open space on the site should</u> This would provide a setting for public rights of way in the area and maintain their views of the Salisbury cathedral spire <u>and this could be achieved through careful street alignment and locating open space in the southern part of the site. The sloping buffer of land on the northern edge of the site should be enhanced with tree planting and the landscape buffer along Rowbarrow (road) retained.</u>”</p>	
<p>Page 281 C89</p>	<p>Paragraph 5.147</p>	<p>ID: 403792 Rep: 1647</p>	<p>Improve clarity. To reflect the advice provided by Historic England.</p>	<p>Amend paragraph to read: Development will need to preserve the contribution made by the site to the setting and therefore the importance of the Woodbury Ancient Villages Scheduled Monument. If necessary land will need to be set aside from development. <u>In line with national policy, detailed design and layout will be guided by an assessment of heritage assets and their significance (including the contribution made by their setting).</u> Heritage Impact Assessment. Scheduled monument consent will be required. The site also has high archaeological potential.</p>	<p>Minor</p>
<p>Housing allocation H3.5: Clover Lane, Durrington</p>					
<p>PC90</p>	<p>New paragraph after 5.152</p>		<p>In response to comments from Natural England and Environment Agency regarding River Avon SAC and phosphate loads.</p>	<p><u>Development could contribute cumulatively towards adverse impacts on the qualifying features of the River Avon SAC through increased phosphate loading and habitat loss/damage. As such, a Nutrient Management Plan seeks to avoid the</u></p>	

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				<u>likelihood of adverse effects. Nonetheless, impacts are kept under review and this situation may change. For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC. Housing developers might consider how schemes can offset the additional phosphate loading resulting from new homes and specific measures will be set out in the annex to the Nutrient Management Plan.</u>	
PC91	Figure 5.23 Paragraph 5.153	ID: 1119095 Rep: 1584	Factual update. Amend site boundary to reflect boundary correction.	Amend the boundary of the allocation as set out in Annex K. And amend first sentence of paragraph 5.153 to read: “Approximately 1.9 4-8ha of land to the north of Clover Lane, Durrington is allocated for the development of approximately 45 dwellings, as identified on the Policies Map.”	Minor
PC92	Paragraph 5.155	ID: 403792 Rep: 1647	Improve clarity. To reflect the advice provided by Historic England.	Amend paragraph 5.155 as follows: “The site lies adjacent to the Durrington Conservation Area to the east and a number of Listed Buildings. Detailed design and layout would need to preserve or enhance the character of the Conservation Area and this is particularly important for the eastern portion of the site. Development should minimise the potential for harm to the significance of Listed Buildings and the Conservation Area. <u>In line with national policy, d</u> Detailed design and layout will be guided by <u>an assessment of heritage assets and their significance (including the contribution made by their setting).</u> Informed by a Heritage Impact Assessment these considerations	

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				should be resolved through the detailed design and layout of the scheme.”										
PC93	Paragraph 5.156	ID: 395940 Rep: 2967, 2968, 2969	<p>Improve clarity.</p> <p>Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites, as well as groundwater.</p>	<p>Insert new text at the end of paragraph:</p> <p><u>“Considering the size of the site a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design will be required. In addition, as the site lies within Groundwater Protection Zone 1 development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency’s groundwater protection policy.”</u></p>	Minor									
Housing allocation H3.6: Larkhill Road, Durrington														
PC94	Paragraph 5.157	ID: 395940 Rep 2967, 2968, 2969	<p>Improve clarity.</p> <p>Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address groundwater.</p>	<p>Add new sentences to end of paragraph:</p> <p><u>“As the site lies within Groundwater Protection Zone 1 development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency’s groundwater protection policy.”</u></p>	Minor									
Chapter 6 Settlement Boundary Review														
PC95	Table 6.1 (Page 72)	ID: Rep:	<p>Factual update.</p> <p>Change to table to show that the settlement boundary for West Lavington and Littleton Panell is not being reviewed by the Wiltshire Housing Site Allocations Plan because this is now being</p>	<p>Move West Lavington and Littleton Panell into column 3 of Table 6.1:</p> <table border="1" data-bbox="1079 1139 1951 1337"> <tr> <td colspan="3">Devizes</td> </tr> <tr> <td></td> <td>Devizes*</td> <td>Devizes*</td> </tr> <tr> <td></td> <td>Bromham</td> <td>Pottern</td> </tr> </table>	Devizes				Devizes*	Devizes*		Bromham	Pottern	Minor
Devizes														
	Devizes*	Devizes*												
	Bromham	Pottern												

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

			undertaken by a neighbourhood plan.	<table border="1"> <tr> <td></td> <td>Market Lavington</td> <td>Urchfont</td> </tr> <tr> <td></td> <td>Rowde</td> <td><u>West Lavington and Littleton Panell</u></td> </tr> <tr> <td></td> <td>West Lavington and Littleton Panell</td> <td></td> </tr> <tr> <td></td> <td>Worton</td> <td></td> </tr> </table>		Market Lavington	Urchfont		Rowde	<u>West Lavington and Littleton Panell</u>		West Lavington and Littleton Panell			Worton		
	Market Lavington	Urchfont															
	Rowde	<u>West Lavington and Littleton Panell</u>															
	West Lavington and Littleton Panell																
	Worton																
PC96 Page 284	Appendix A (Page 79), Paragraph A.1	ID: Rep:	<p>Factual update.</p> <p>Text change to show that the settlement boundary for West Lavington and Littleton Panell is not being reviewed by the Wiltshire Housing Site Allocations Plan because this is now being undertaken by a neighbourhood plan.</p>	<p>Delete bullet point 5:</p> <p>West Lavington and Littleton Panell</p>	Minor												
PC97	Appendix A (Page 79), Paragraph A.3	ID: Rep:	<p>Factual update.</p> <p>Text change to show that the settlement boundary for West Lavington and Littleton Panell is not being reviewed by the Wiltshire Housing Site Allocations Plan because this is now being undertaken by a neighbourhood plan.</p>	<p>Amend paragraph A.3:</p> <p>“The settlement boundaries for Potterne₂ and Urchfont <u>and West Lavington and Littleton Panell</u> have not been reviewed because of neighbourhood plans.”</p>	Minor												

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

PC98	Page 84	ID: Rep:	Factual update. The settlement boundary for West Lavington and Littleton Panell is not being reviewed by the Wiltshire Housing Site Allocations Plan because this is now being undertaken by a neighbourhood plan.	Delete 'West Lavington and Littleton Panell settlement boundary' map.	Minor		
Page 285	Page 73, Table 6.2	ID: Rep:	Factual update. Change to table to show that the settlement boundary for Christian Malford is not being reviewed by the Wiltshire Housing Site Allocations Plan because this has now been undertaken by a neighbourhood plan.	Move Christian Malford into column 3 of Table 6.2:	Minor		
				Chippenham⁽²⁴⁾			
						Christian Malford	<u>"Christian Malford"</u>
						Hullavington	
						Kington St Michael	
PC100	Appendix A (Page 108), paragraph A.34	ID: 1118671 Rep: 55 ID: 910890 Rep: 619	Factual update. Text change to show that the settlement boundary for Christian Malford is not being reviewed by the Wiltshire Housing Site Allocations Plan because this has now been	Delete bullet point 1: Christian Malford	Minor		

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

			undertaken by a neighbourhood plan.				
PC101	Appendix A (Page 108), paragraph A.35	ID: 1118671 Rep: 55 ID: 910890 Rep: 619	Factual update. Text change to show that the settlement boundary for Christian Malford is not being reviewed by the Wiltshire Housing Site Allocations Plan because this has now been undertaken by a neighbourhood plan.	Add sentence to the end of paragraph A.35: <u>“The settlement boundary for Christian Malford has not been reviewed because of a neighbourhood plan.”</u>	Minor		
PC102	Page 109	ID: 1118671 Rep: 55 ID: 910890 Rep: 619	Factual update. The settlement boundary for Christian Malford is not being reviewed by the Wiltshire Housing Site Allocations Plan because this has now been undertaken by a neighbourhood plan.	Delete Christian Malford map.	Minor		
Page 286	Page 74, Table 6.2	ID:1051839 Rep: 1548	Factual update. Change to table to show that the settlement boundary for Cricklade is not being reviewed by the Wiltshire Housing Site Allocations Plan because this has now been undertaken by a neighbourhood plan.	Move Cricklade into column 3 of Table 6.2:	Minor		
				Royal Wootton Bassett and Cricklade			
						Cricklade	<u>“Cricklade”</u>
						Lyneham	
						Purton	
		Royal Wootton Bassett					

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

PC104	Appendix 1 (Page 132), paragraph A.60,	ID:1051839 Rep: 1548	Factual update. Text change to show that the settlement boundary for Cricklade is not being reviewed by the Wiltshire Housing Site Allocations Plan because this has now been undertaken by a neighbourhood plan.	Delete bullet point 2: Cricklade	Minor
PC105	Appendix A (Page 132) paragraph A.60	ID:1051839 Rep: 1548	Factual update. Text change to show that the settlement boundary for Cricklade is not being reviewed by the Wiltshire Housing Site Allocations Plan because this has now been undertaken by a neighbourhood plan.	Add new paragraph after paragraph A.60: <u>“A.61 The settlement boundary for Cricklade has not been reviewed because of a neighbourhood plan.”</u>	Minor
PC106	Page 134	ID:1051839 Rep: 1548	Factual update. The settlement boundary for Christian Malford is not being reviewed by the Wiltshire Housing Site Allocations Plan because this has now been undertaken by a neighbourhood plan.	Delete Cricklade map.	Minor

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

Settlement Boundary Review Changes

Following consideration of representations to the pre-submission consultation, a schedule of proposed changes to settlement boundaries (including recent development up to April 2017), have been presented as tracked changes in the submission version of the Community Area Topic Papers. **Appendix A to the Community Area Topic Papers** contains new tables listing the proposed changes for each settlement, where relevant, and revised settlement boundary review maps for all settlements.

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

Replacement tables 4.1, 4.7, 4.8, 4.9, 4.10, 4.11 to reflect the latest housing land supply statement published March 2018 (base date April 2017)

Table 4.1 Housing Market Areas: Minimum to be allocated

Housing Market Area	Minimum Housing Requirement	Completions 2006-2017	Developable commitments 2017-2026	Minimum to be allocated
East Wiltshire HMA	5,940	3,497 <u>3,624</u>	2,273 <u>2,311</u>	470 <u>5</u>
North and West Wiltshire HMA	24,740	42,603 <u>13,025</u>	41,566 <u>10,606</u>	574 <u>1,109</u>
South Wiltshire HMA	10,420	5,067 <u>5,388</u>	4,759 <u>3,701</u>	594 <u>1,331</u>

Table 4.7 HMA housing land supply 2006-2026

HMA	Housing requirement 2006-2026	Housing Completions 2006-2017	Commitments 2017-2026	Windfall allowance (2017-2026)	Plan allocations 2017-2026	TOTAL	Surplus
East Wiltshire	5,940	3,497 <u>3,624</u>	2,273 <u>2,311</u>	811 <u>823</u>	241	6,822 <u>6,997</u>	882 <u>1,057</u>
North & West Wiltshire	24,740	42,603 <u>13,025</u>	41,566 <u>10,606</u>	2,086 <u>2,209</u>	1,195 <u>1,395</u>	27,035 <u>27,235</u>	2,710 <u>2,495</u>
South Wiltshire	10,420	5,388 <u>5,388</u>	4,759 <u>3,701</u>	736 <u>743</u>	795 <u>804</u>	41,357 <u>10,636</u>	937 <u>216</u>

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

Table 4.8 HMA Five year land supply estimates 2017-2026

Year supply (Liverpool)	2017/2018	2018/2019	2019/2010	2020/2011	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026
East HMA	9.18 <u>8.77</u>	9.11 <u>9.07</u>	9.75 <u>9.95</u>	12.20 <u>11.21</u>	22.44 <u>16.33</u>	20.18 <u>17.13</u>	14.01 <u>15.45</u>	9.81 <u>14.24</u>	7.45 <u>9.83</u>
North and West HMA	7.15 <u>6.24</u>	7.54 <u>6.80</u>	7.64 <u>7.01</u>	7.54 <u>7.07</u>	7.85 <u>7.19</u>	7.92 <u>7.24</u>	7.48 <u>7.13</u>	6.54 <u>6.60</u>	5.30 <u>5.74</u>
South HMA	6.09 <u>5.70</u>	6.30 <u>5.95</u>	6.43 <u>5.75</u>	6.65 <u>5.57</u>	6.88 <u>5.46</u>	7.13 <u>5.14</u>	6.70 <u>4.19</u>	5.87 <u>3.25</u>	4.75 <u>2.42</u>

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

Table 4.9 East Wiltshire HMA – Distribution of housing development 2006-2026

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
Urban areas					
Devizes	2,010	1,447 <u>1,501</u>	689 <u>612</u>	2,136 <u>2,113</u>	6.3% <u>5.1%</u>
Marlborough	680	357 <u>397</u>	306 <u>304</u>	663 <u>701</u>	2.6% <u>3.1%</u>
Tidworth and Ludgershall	1,750	728 <u>767</u>	1,109 <u>1,177</u>	1,836 <u>1,944</u>	5.0% <u>11.1%</u>
TOTAL	4,440	2,532 <u>2,665</u>	2,103 <u>2,093</u>	4,635 <u>4,758</u>	4.4% <u>7.2%</u>
Rural areas					
Devizes CA remainder	490	286 <u>297</u>	182 <u>177</u>	468 <u>474</u>	-4.5% <u>-3.3%</u>
Marlborough CA remainder	240	160 <u>157</u>	46 <u>52</u>	206 <u>209</u>	-14.1% <u>-12.9%</u>
Pewsey CA	600	426 <u>416</u>	179 <u>192</u>	605 <u>608</u>	0.9% <u>1.3%</u>
Tidworth CA remainder	170	93 <u>89</u>	3 <u>23</u>	96 <u>112</u>	-43.5% <u>-34.1%</u>
TOTAL	1,500	965 <u>959</u>	410 <u>444</u>	1,375 <u>1,403</u>	-8.3% <u>-6.5%</u>

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

Table 4.10 North and West Wiltshire HMA – Distribution of housing development 2006-2026

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
Urban areas					
Bradford on Avon	595	387 384	242 218	599 602	1%
Calne	1,440	964 1,034	807 847	4,768 1,881	23% 31%
Chippenham	4,510	4,204 1,230	3,849 3,016	5,023 4,246	44% -6%
Corsham	1,220	646 597	587 629	4,233 1,226	4% 0%
Malmesbury	885	560 657	455 385	4,045 1,042	45% 18%
Melksham and Bowerhill	2,240	4,370 1,445	4,224 1,113	2,594 2,558	46% 14%
Royal Wootton Bassett	1,070	997 1,014	458 140	4,155 1,154	-18% 8%
Trowbridge	6,810	2,965 3,019	2,625 2,544	5,590 5,563	-45% -18%
Warminster	1,920	603 615	4,055 1,140	4,658 1,755	-44% -9%
Westbury	1,500	877 940	934 851	4,808 1,791	24% 19%
TOTAL	22,190	40,570 10,935	41,874 10,883	22,444 21,818	4% 2%
Rural areas					
Bradford on Avon CA remainder	185	419 123	72 56	494 179	3% -3%
Calne CA remainder	165	92 96	453 171	245 267	49% 62%
Chippenham CA remainder	580	409 419	443 166	522 585	-40% 1%
Corsham CA remainder	175	255 285	96	354 381	104% 118%
Malmesbury CA remainder	510	336 340	444 210	480 550	-6% 8%
Melksham CA remainder	130	404 115	38 44	439 159	7% 22%
Royal Wootton Bassett and Cricklade CA remainder	385	345 305	450 177	465 482	24% 25%
Trowbridge CA remainder	165	255 256	23 32	278 288	69% 75%
Warminster CA remainder	140	64 91	53 68	143 159	2% 14%

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

Westbury CA remainder	115	61 <u>60</u>	47 <u>46</u>	408 <u>106</u>	-6% <u>-8%</u>
TOTAL	2,550	2,033 <u>2,090</u>	890 <u>1,274</u>	2,923 <u>3,364</u>	15% <u>24%</u>

Table 4.11 South Wiltshire HMA – Distribution of housing development 2006-2026

Area	Indicative requirement 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	TOTAL	% Variation
Urban areas					
Amesbury, Bulford and Durrington	2,440	1,311 <u>1,446</u>	1,101 <u>873</u>	2,412 <u>2,319</u>	-1% <u>-5%</u>
Salisbury	6,060	2,273 <u>2,436</u>	3,833 <u>2,956</u>	6,637 <u>5,924</u>	10% <u>-2%</u>
Wilton		323 <u>321</u>	208 <u>211</u>		
TOTAL	8,500	3,907 <u>4,203</u>	5,142 <u>4,040</u>	9,049 <u>8,243</u>	6% <u>-3%</u>
Rural areas					
Amesbury CA remainder	345	479 <u>176</u>	58 <u>73</u>	237 <u>249</u>	-31% <u>-28%</u>
Mere CA remainder	50	37 <u>42</u>	5 <u>7</u>	42 <u>49</u>	-15% <u>-2%</u>
Mere	235	426 <u>123</u>	439 <u>143</u>	265 <u>266</u>	13%
Downton	190	88 <u>101</u>	405 <u>92</u>	193	2%
Tisbury	200	470 <u>169</u>	5 <u>9</u>	475 <u>178</u>	-42% <u>-11%</u>
Wilton CA remainder	255	445 <u>123</u>	44 <u>14</u>	426 <u>137</u>	-51% <u>-46%</u>
Southern Wiltshire CA remainder	425	385 <u>389</u>	78 <u>98</u>	463 <u>487</u>	9% <u>15%</u>
Tisbury CA remainder	220	60 <u>62</u>	44 <u>16</u>	74 <u>78</u>	-68% <u>-65%</u>
TOTAL	1,920	4,160 <u>1,185</u>	412 <u>452</u>	4,572 <u>1,637</u>	-48% <u>-15%</u>

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

Table 4.4 East Wiltshire Housing Market Area – Summary of allocations

Settlement	SHLAA reference	Site name	Approximate dwellings
Market Lavington	1089	Southcliffe	15
	2055/530	Underhill Nursery	50
	3443	East of Lavington School	15
Ludgershall	553	Empress Way	270 ²

Table 4.5 North and West Wiltshire Housing Market Area – Summary of allocations

Settlement	SHLAA reference	Site name	Approximate dwellings
Hullavington	690	The Street	50
Yatton Keynall	482	East of Farrells Field	30
Crudwell	3233	Ridgeway Farm	50 ³
Trowbridge	613	Elm Grove Farm	200 250
	1021	Church Lane	45
	3260	Upper Studley	20 45
	298	Land off the A363 at White Horse Business Park	450 300
	3565	Southwick Court	180
	297/263	Elizabeth Way	205 355
Warminster	603	East of the Dene	100
	302/1032	Bore Hill Farm	70
	304	Boreham Road	30
Chapmanslade	316	Barthers Farm Nurseries	35
Bratton	321	Court Orchard/Cassways	40 35

² This total includes 109 dwellings that already have planning permission

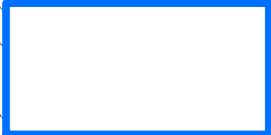
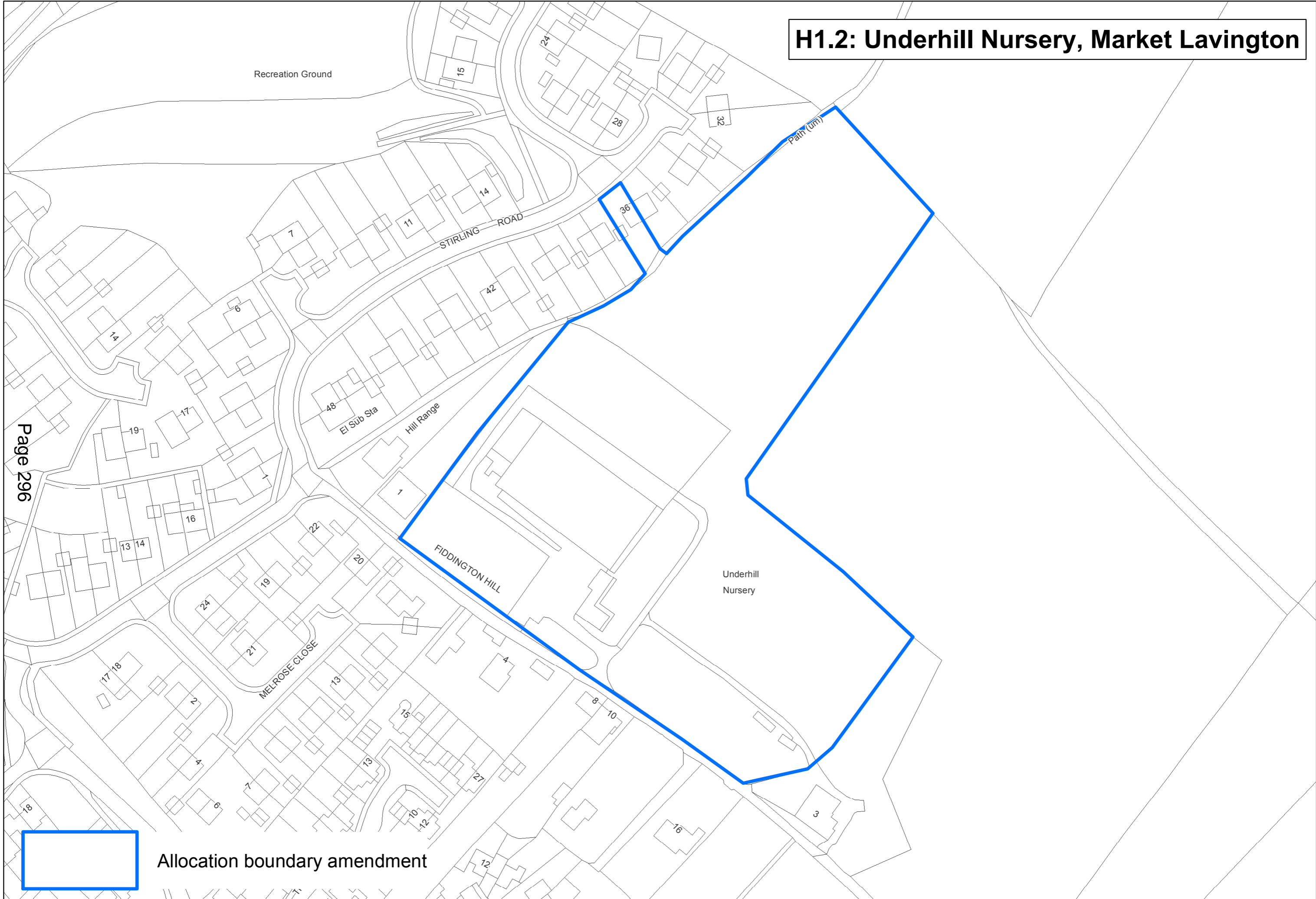
³ This total includes 10 dwellings that already have planning permission

Appendix 2: Schedule of Proposed Changes to the Pre-submission Draft Plan (May 2018)

Table 4.6 Southern Wiltshire Housing Market Area – Summary of allocations

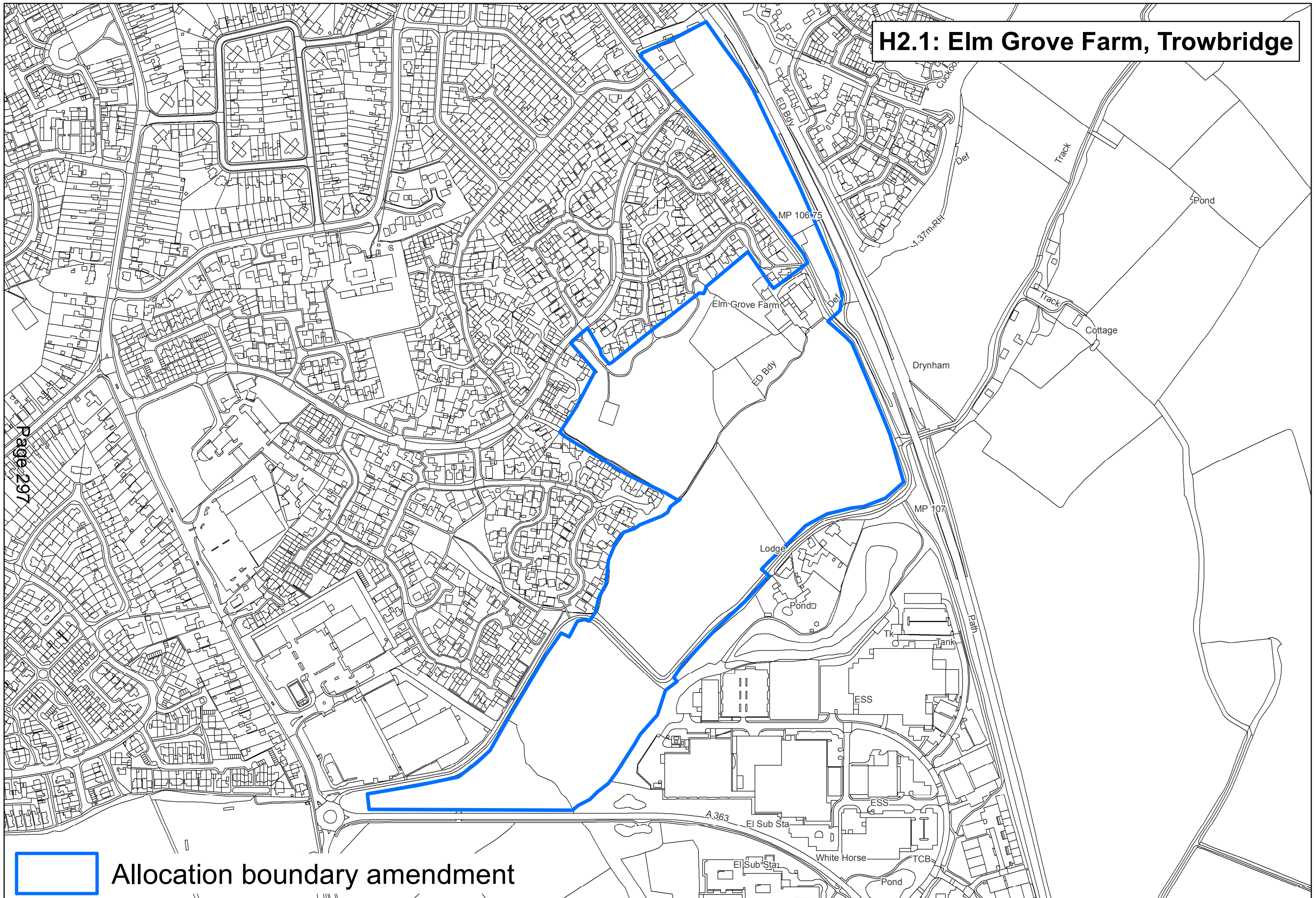
Settlement	SHLAA reference	Site name	Approximate dwellings
Durrington	3154/S98	Clover Lane	45
	3179	Land off Larkhill Road	15
Salisbury	S1028	Land at Netherhampton Road	640
	S61	Land at Hilltop Way	10
	S1027	North of Netherhampton Road	100
	3272	Rowbarrow	100
	<u>OM003</u>	<u>The Yard</u>	<u>14</u>

H1.2: Underhill Nursery, Market Lavington



Allocation boundary amendment

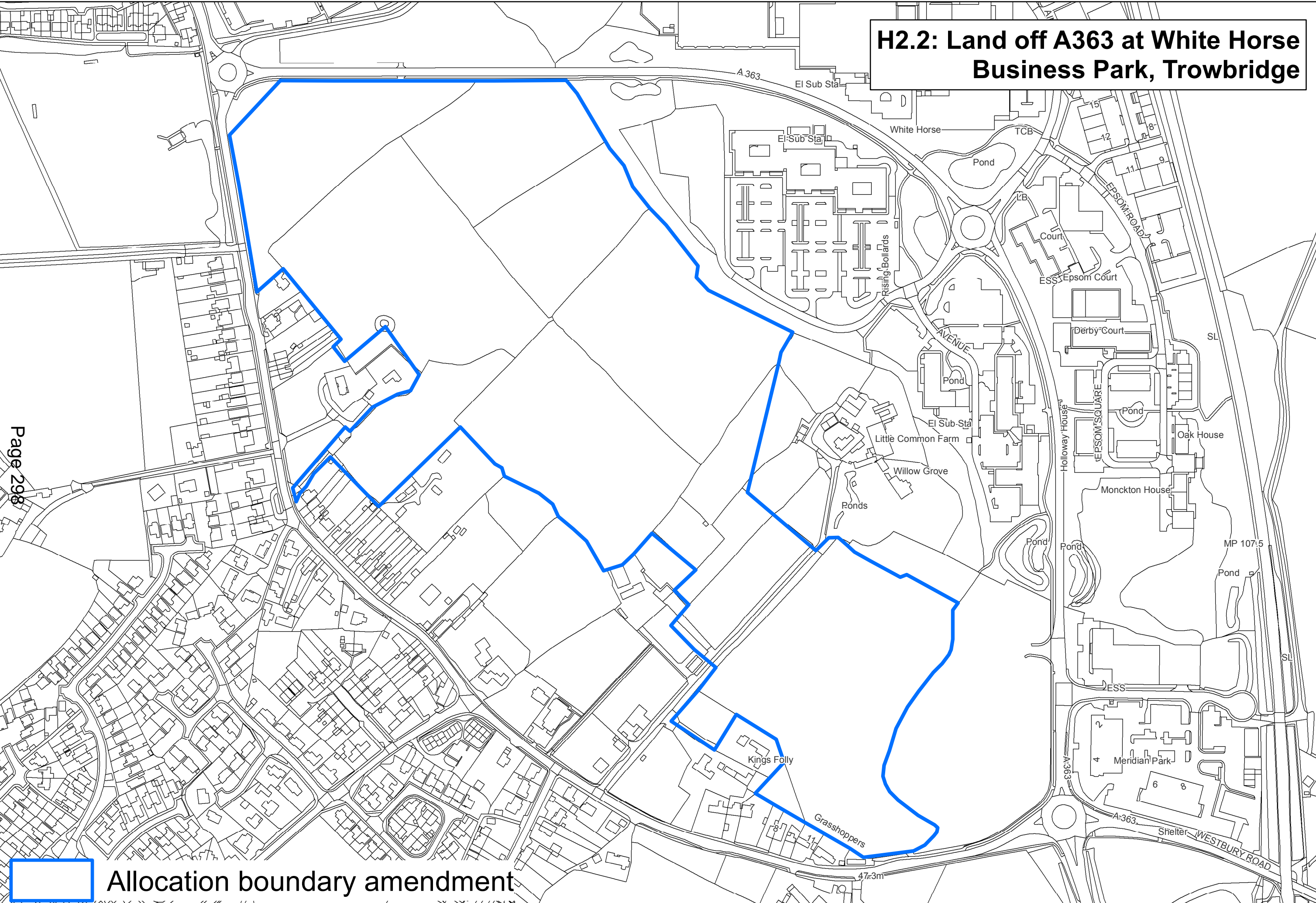
H2.1: Elm Grove Farm, Trowbridge



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 Allocation boundary amendment

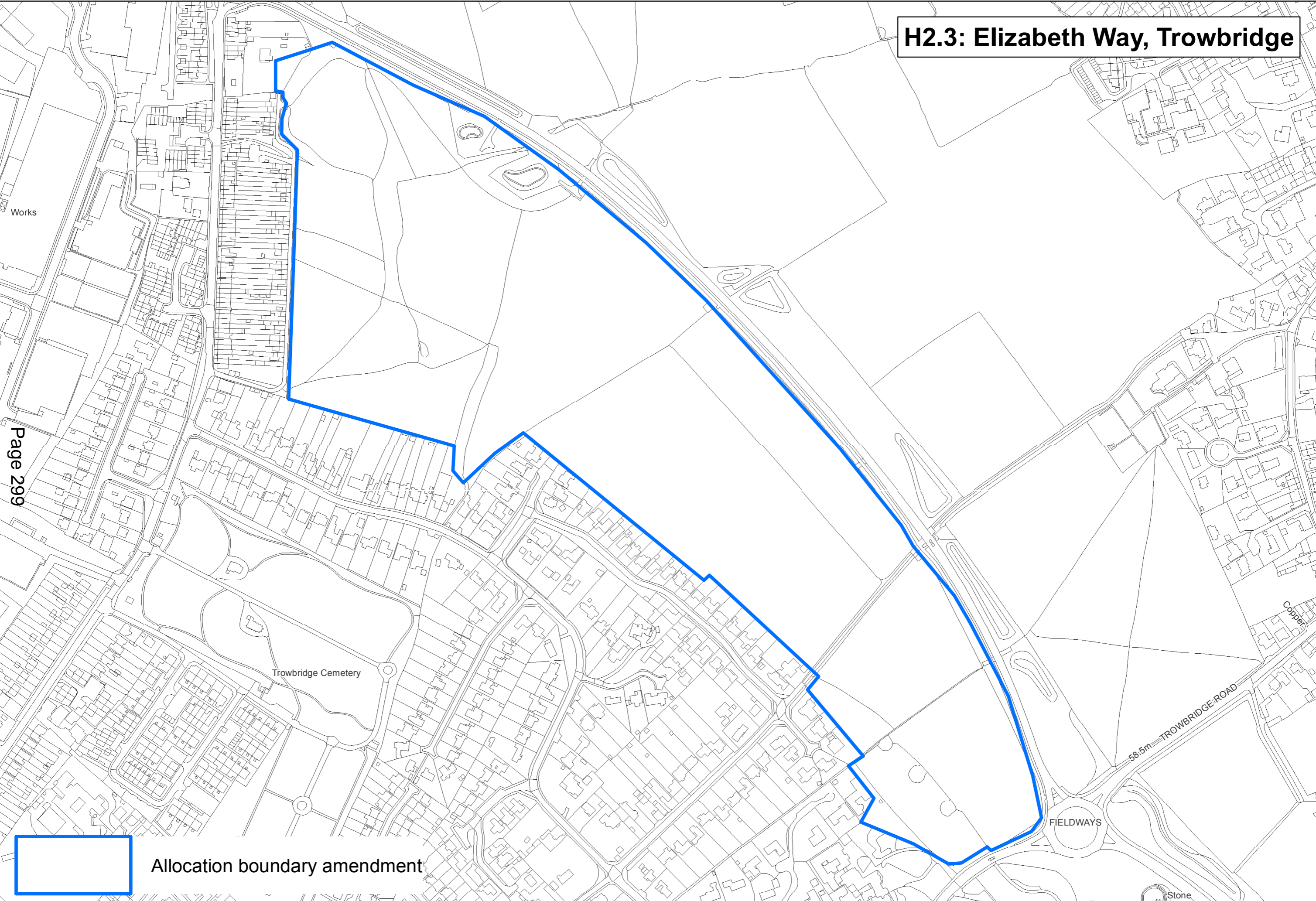
H2.2: Land off A363 at White Horse Business Park, Trowbridge



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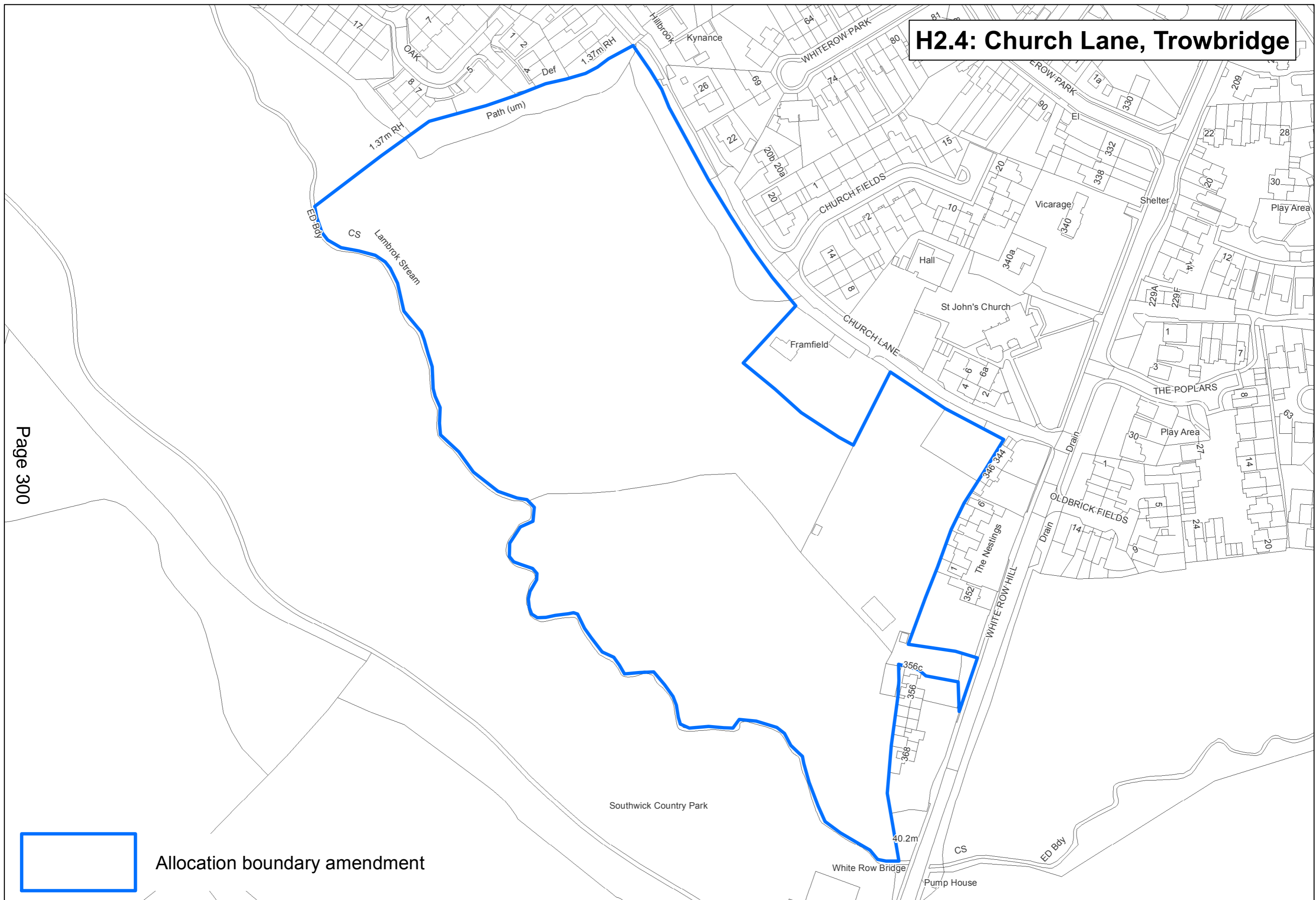
 Allocation boundary amendment

H2.3: Elizabeth Way, Trowbridge



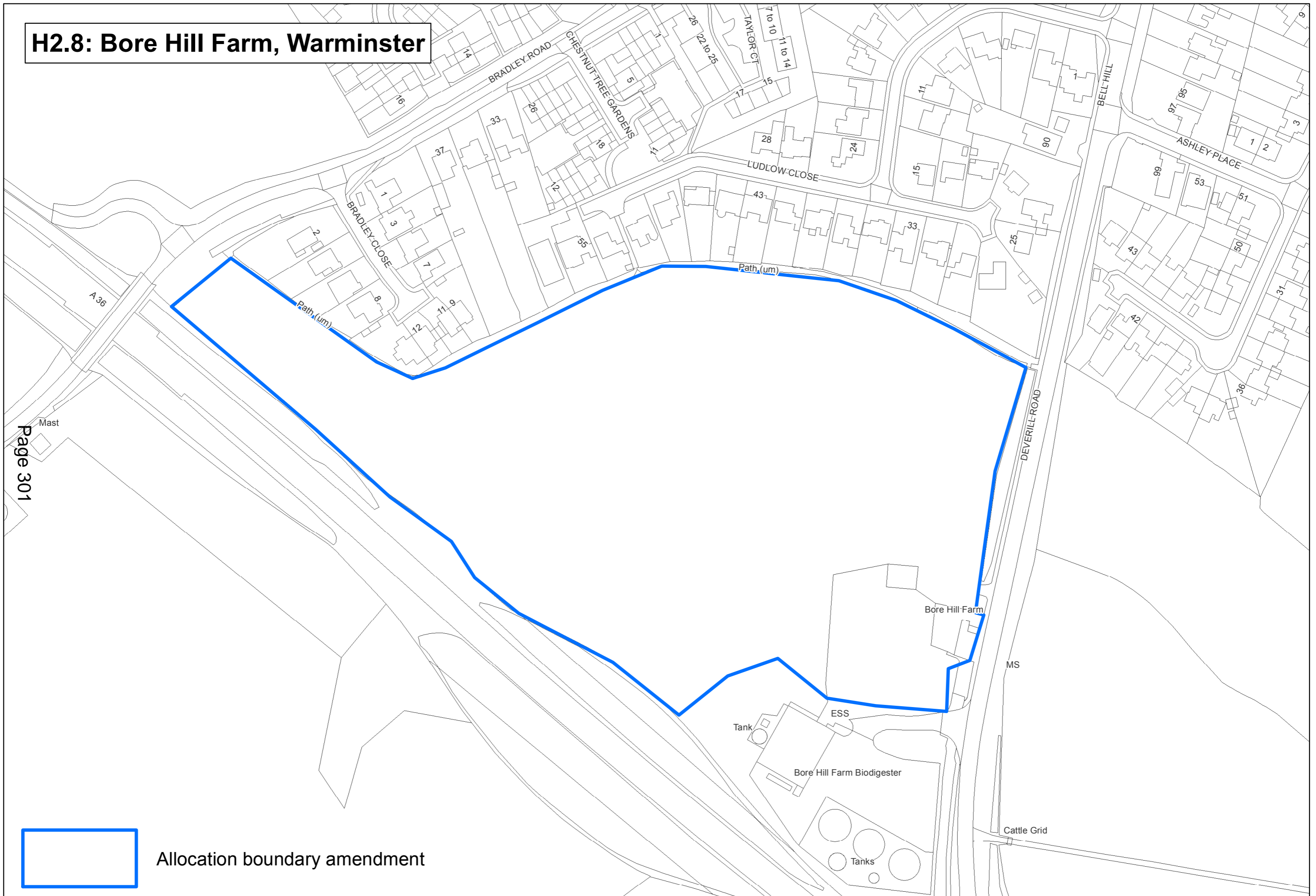
Allocation boundary amendment

H2.4: Church Lane, Trowbridge



Allocation boundary amendment

H2.8: Bore Hill Farm, Warminster

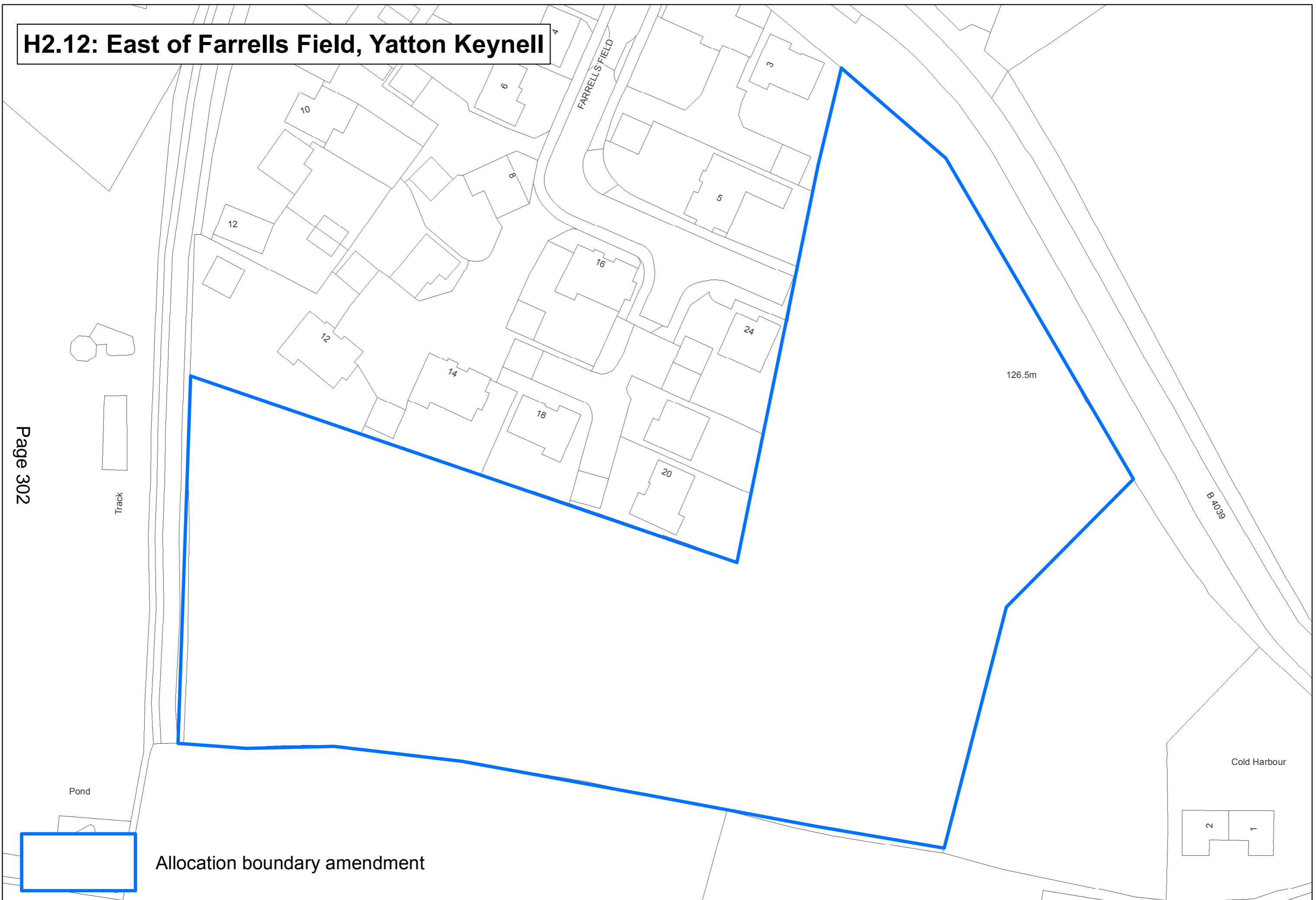


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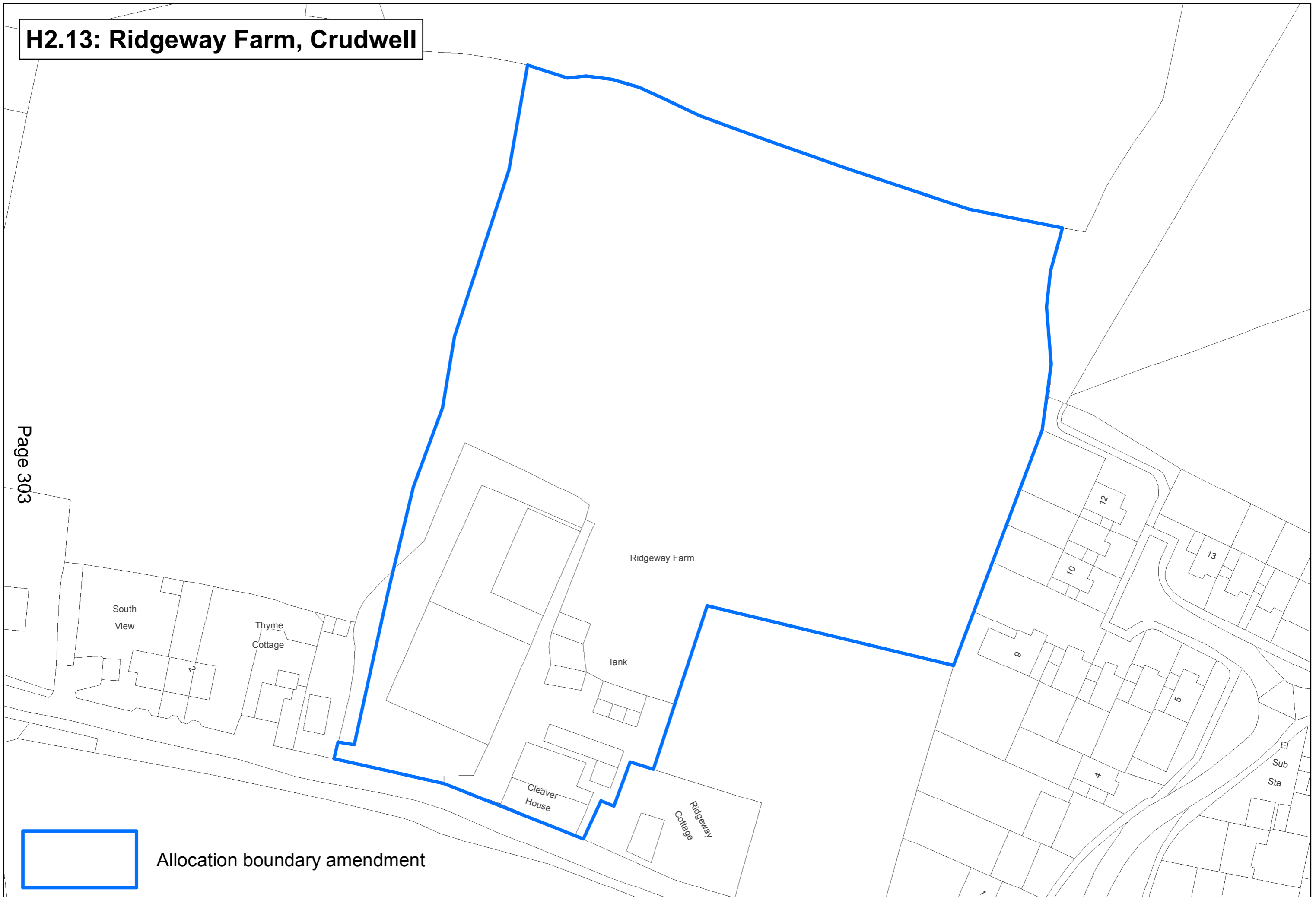
Allocation boundary amendment

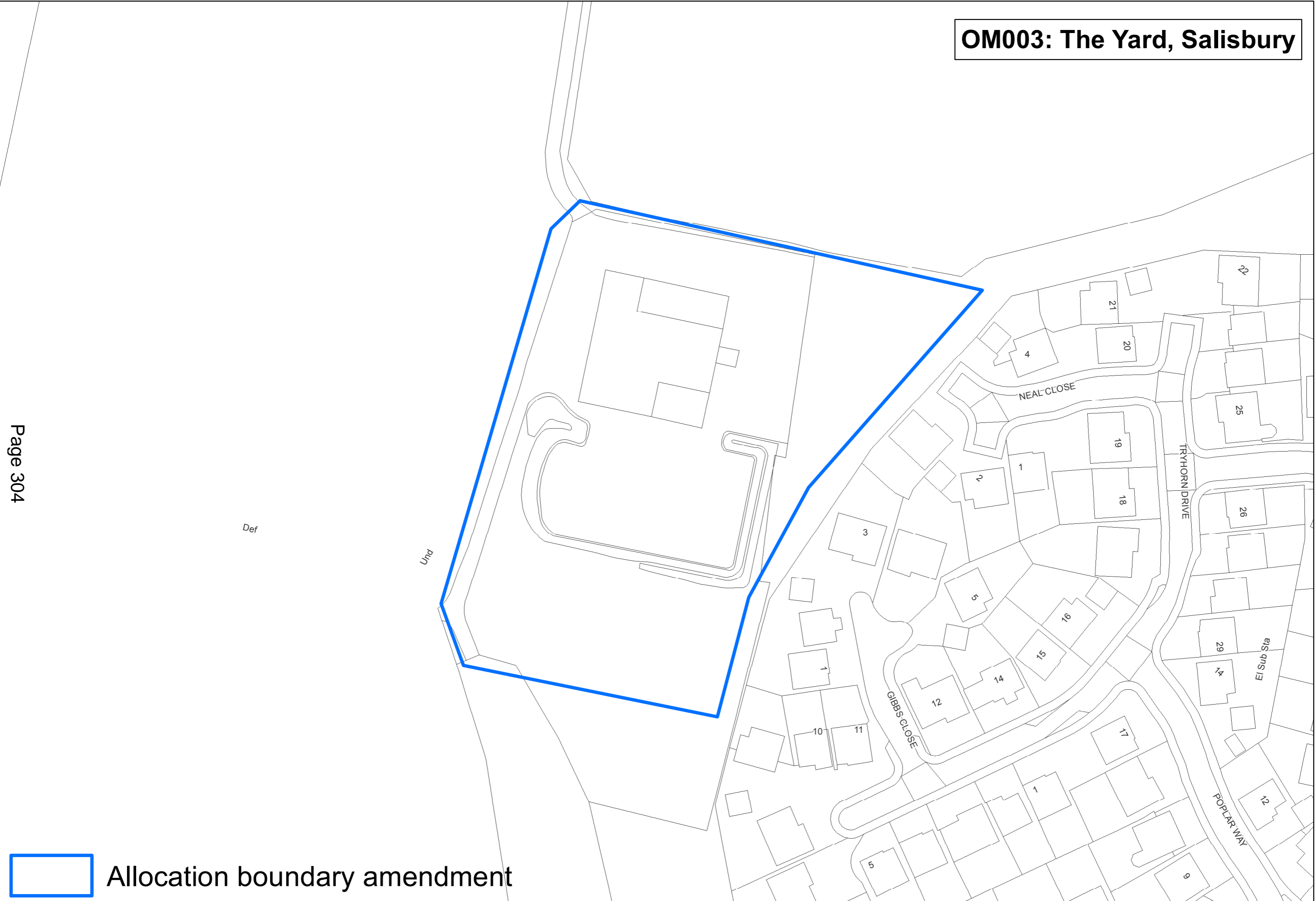
H2.12: East of Farrells Field, Yatton Keynell



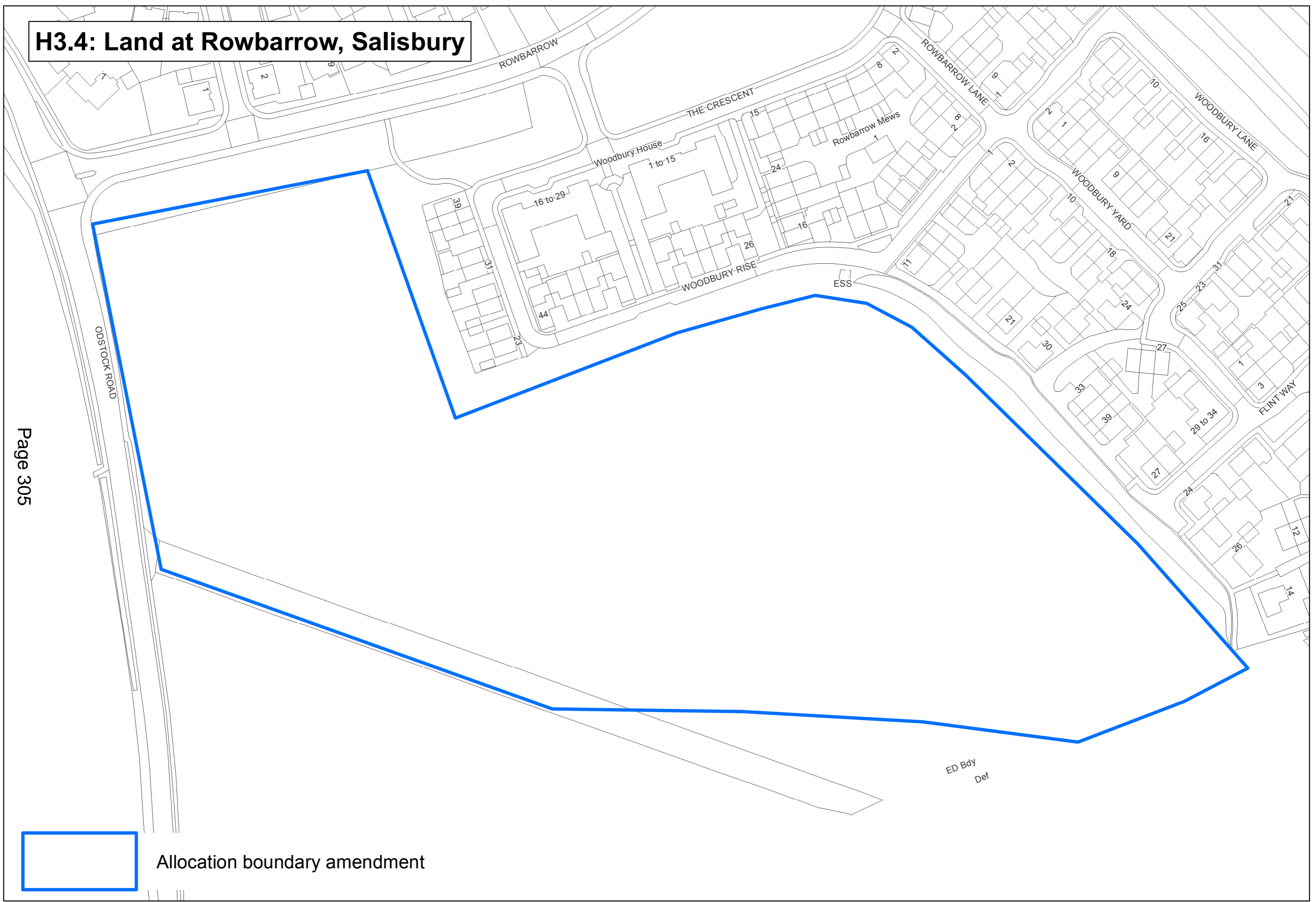
H2.13: Ridgeway Farm, Crudwell

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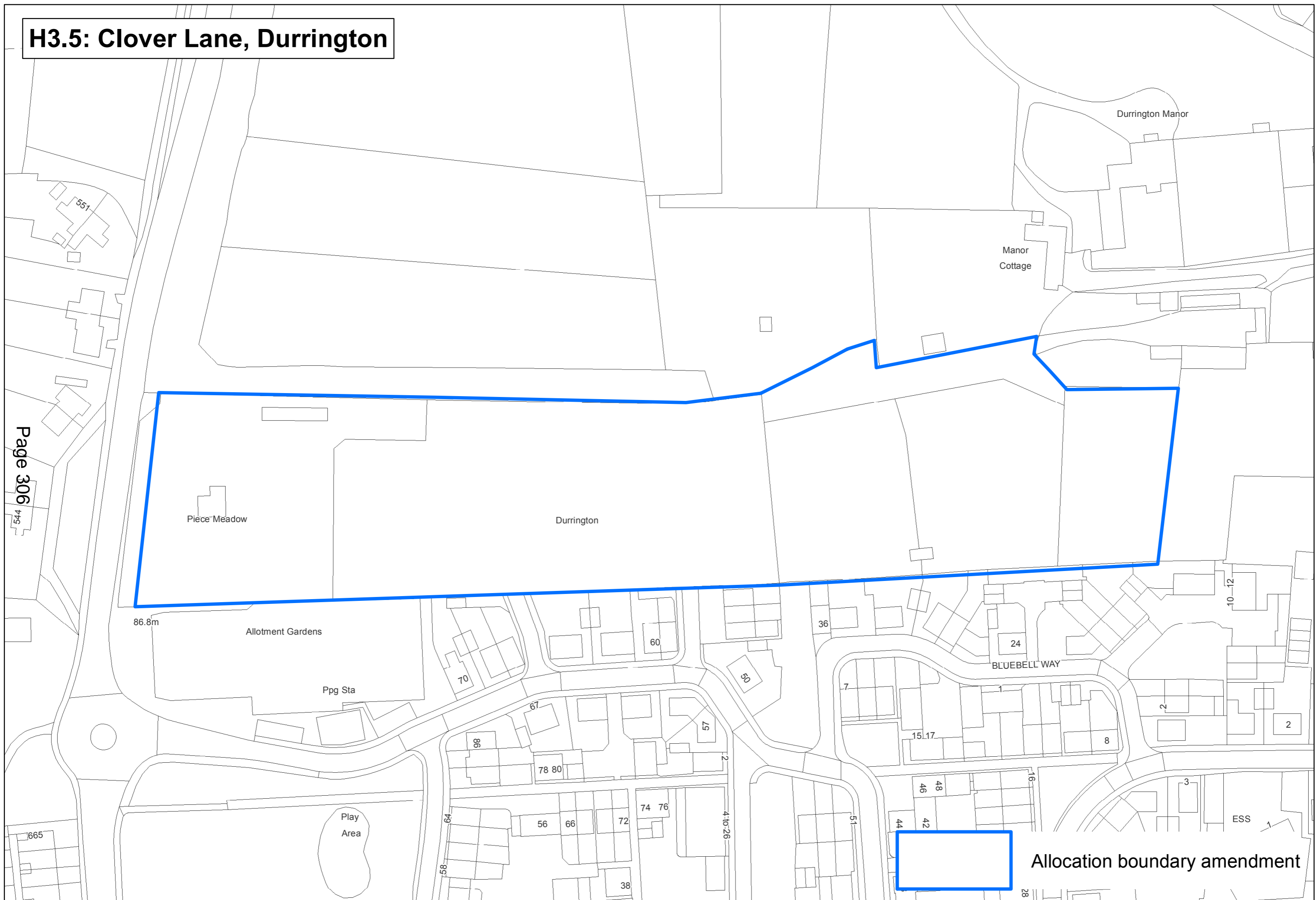


H3.4: Land at Rowbarrow, Salisbury



Allocation boundary amendment

H3.5: Clover Lane, Durrington



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Allocation boundary amendment

Note on Elm Grove Field and Implications for Asset Transfer

1. Background

1.1 The Queen Elizabeth II Field, known as Elm Grove Field, is owned by Wiltshire Council and comprises a playing field of approximately 2.85 hectares (2.7 hectares within the ring fence) accessed from Wiltshire Drive and Champion Drive. It includes a small play area in poor condition and a basketball hoop. The field has no marked-out pitches as it is very wet and thus unsuitable for team sports. Its current use appears to mainly be for dog walking.

1.2 The field was dedicated as the Queen Elizabeth II (QE II) Field at Elm Grove Open Space by a Deed of Dedication dated 15th June 2012 (2012 Deed of Dedication). This was part of a scheme to dedicate fields to celebrate the Queen's diamond jubilee in that year.

The 2012 Deed of Dedication was made between:

- 1) Wiltshire Council; and
- 2) National Playing Fields Association (also known as Fields in Trust).

1.3 There is currently a chronic shortage of primary school places in Trowbridge and the Wiltshire Housing Site Allocations Plan seeks to bring forward a new school site as part of site allocation H2.1 Elm Grove Farm. The Elm Grove Field, which lies adjacent to site allocation H2.1 would provide a suitable site for a new school. This is subject to surface water drainage being improved and the open space provision lost to that school being replaced within the locality - this second point being a requirement of the 2012 Deed of Dedication. Current guidelines require a school of at least 1.8 hectares.

2. Main Considerations

2.1 The field remains part of Wiltshire Council's corporate property holding. The 2012 Deed of Dedication restricts use of the field to open space for recreational or sports facilities and requires Wiltshire Council to obtain the consent of Fields in Trust (FiT) for any disposal. This will include using the land for other purposes.

2.2 The terms on which FiT can consider giving consent are set out in the 2012 Deed of Dedication. These are that the Council: "*replaces or agrees to replace the Property with a piece of freehold land approved by FiT which is of equivalent or better quality than the Property, with equivalent or better facilities than the Property, of the same or greater dimensions than the Property, in the same catchment area as the Property and as accessible to the public as the Property (the Replacement Site) and applies such of the proceeds of any sale of the Property as are necessary to do so*" and "*enters into another deed of dedication on the same terms as this Deed in respect of the Replacement Site*". These requirements are in line with what Wiltshire Council would seek to obtain from a developer in these circumstances. The 2012 Deed of

Dedication also states that, if the above requirements are met, FiT will not unreasonably withhold its consent.

- 2.3 There is the opportunity to incorporate the Elm Grove Field into the proposed site allocation H2.1, which will allow for enhanced open space and sports provision.
- 2.4 The developer would be expected to carry out a comprehensive scheme to improve surface water drainage, which should ensure that the facilities provided will be suitable for team games throughout the year. The 'Replacement Site' is therefore likely to satisfy the requirements of the 2012 Deed of Dedication.
- 2.5 Informal discussions have been held with FiT. Their officer has indicated that if the requirements of the 2012 Deed of Dedication are met, they would be likely to recommend that consent is given.
- 2.6 The current main access to the field (off Wiltshire Drive) is sufficiently large that, subject to highways considerations, it can be used for construction traffic. This means that if the existing field is used for the new school, delivery can be achieved early in the site's development rather than in a later phase where delivery is reliant on infrastructure being in place first. Being able to build the new school early on will help to alleviate the shortage of primary school places in Trowbridge.

3. Procedural matters

- 3.1 Prior to the 2012 Deed of Dedication, the land was held by the Council as open space. Should FiT grant its consent, it would need to be appropriated so that it is held for educational purposes in order that it may be used for a school.
- 3.2 It is normal practice for the Council to acquire land for community purposes once planning permission has been secured. Provisions are generally made through a Section 106 Legal Agreement to secure the transfer of land for specific uses. However, given the 2012 Deed of Dedication, there are additional separate requirements that would need to be finalised following the grant of planning permission as follows:
 1. To seek consent from FiT and secure the release of Elm Grove 'QE II' Field from the 2012 Deed of Dedication; and
 2. Upon the transfer of the 'Replacement Site', Wiltshire Council enters into a new Deed of Dedication with FiT (i.e. National Playing Fields Association), dedicating the replacement field as a QEII Field.

ADDENDUM TO
'Wiltshire Housing Site Allocations Plan
Pre-Submission Draft (June 2017)
Assessment under the Habitats Regulations'

Date of Addendum: 4 May 2018

Wiltshire Council

1. INTRODUCTION

- 1.1 The Habitat Regulations Assessment (HRA) for the Wiltshire Housing Site Allocations Plan was prepared at the time of the pre-submission document¹. This addendum to the HRA supports the submission document due to be presented to cabinet and Full Council in May 2018 and provides an update on progress with the mitigation strategies made to date.
- 1.2 The approach to mitigation for the River Avon Special Area of Conservation (SAC) has been simplified following advice received from the statutory agencies in March. Annex 2 of the Nutrient Management Plan (NMP) remains at the centre of the approach which is now being progressed in partnership with other authorities in the catchment and the statutory agencies.
- 1.3 Work on the mitigation strategy for the Bath and Bradford on Avon Bats SAC has been contracted to an ecological consultancy with appropriate expertise, and good progress is being made. This Addendum expands on what the strategy aims to deliver and considers the implications for this SAC of the increased housing numbers proposed at four allocations at Trowbridge.
- 1.4 Since the pre-submission HRA was prepared, the 'HRA and Mitigation Strategy for Salisbury Plain SPA' has been revised and two site allocations not previously considered have been included due to revised measurements which show they fall within the zone that generates most visitor pressure. The Addendum explains the implications of this in terms of numbers of additional visitors and consequences for the Special Protection Area (SPA) mitigation strategy.

2. FURTHER INFORMATION AVAILABLE SINCE JUNE 2017

2.1 Salisbury Plain SPA

- 2.1.1 The following changes have occurred since the pre-submission HRA:
 - Closer examination of the allocated sites has identified that two sites not previously included, should be counted towards calculations of residents who will be living within 6.4km of the SPA. These are: Land off the A363 at White Horse Business Park at Trowbridge (H2.2) and, Barter's Farm Nurseries at Chapmanslade (H2.10). These two sites are therefore screened in for likely significant effects, along with the other ten allocations within 6.4km of the SPA boundary.
 - The 'HRA and Mitigation Strategy for Salisbury Plain SPA'² has been revised to take account of the implications of the growth proposed in the Wiltshire Housing Site Allocations Plan submission draft and its distribution.

2.2 River Avon SAC

¹ Wiltshire Housing Site Allocations Plan Submission Draft: Assessment under the Habitats regulations, 21 June 2017 Wiltshire Council

² HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreation pressure from residential development). Wiltshire Council May 2018

- 2.2.1 Since the pre-submission HRA was written, the Council has been advised by the Environment Agency (EA) and Natural England that it cannot rely on the River Avon Special Area of Conservation Nutrient Management Plan (NMP) which was published in April 2015. A joint statement advised:

“Evidence suggests that the targets in the Hampshire Avon nutrient management plan are unlikely to be delivered by 2021. We are modelling what this means for the Nutrient Management Plan, and will be providing recommendations in March 2019.

We know that there will be new development and we advise that the new development within the catchment of the Hampshire Avon needs to be “phosphate neutral”. We will work with you to help you demonstrate how that can be best achieved.” (Email from EA to Wiltshire Council, New Forest District Council and East Dorset/Christchurch Council, 9th March 2018)

- 2.2.2 The aim of the NMP is to bring phosphate concentrations in the River Avon SAC down to the conservation targets set by Natural England in order to bring the river system into favourable condition as required by the Habitats Regulations. Due to the complex factors influencing phosphate in the Avon, the NMP set interim progress goals which were to be achieved by the end of 2021. The underlying premise of the plan was that increases in sewage derived phosphate would be more than offset by reductions from agricultural sources, such as farming, due to the catchment sensitive farming initiative which is funded through Defra. However, by early 2018, Natural England and the EA reported that catchment sensitive farming was much less effective than projected in the NMP modelling and unlikely to offset increased phosphates from new development.
- 2.2.3 Consequently, the Council has been advised that in order to comply with the Habitats Regulations, it should demonstrate all development is “phosphate neutral” for an interim period until any necessary permanent reductions can be accommodated in the water company’s asset management plan. During this period, the availability of permit headroom cannot be taken into consideration. The relevant parties have agreed to work under a Memorandum of Understanding (MoU) which sets out a method for calculating and offsetting phosphate generated by each new development approved in the interim period and commits to identifying measures that will be delivered to reduce phosphates in the catchment. It is recognised that the conservation targets will only be met in the long term if measures are taken to reduce runoff from agricultural land and discharge concentrations from sewage treatment works. Both these measures are outside the control of local authorities.

2.3 Bath and Bradford on Avon Bats SAC

- 2.3.1 Changes which have occurred since the pre-submission HRA are as follows:
- 2.3.2 Natural England has responded to the pre-submission consultation in a letter dated 28 September 2017 raising several limitations of the plan. It queries whether bat survey evidence is adequate to support the housing numbers proposed at Trowbridge and asks for clarification on how bat habitat will be mitigated on-site. These matters are picked up in the discussion below.

2.3.3 In terms of addressing in-combination effects, Natural England agrees that a strategic approach is capable of addressing residual effects. With regard to this, significant progress is being made with the Trowbridge Recreation Management Mitigation Strategy, now confirmed as the **Trowbridge Bat Mitigation Strategy** (TBMS). A specialist consultancy has been engaged and is working to progress the following:

- A map showing zones where development would have a high or medium risk of adverse effects for features of the bats SAC (i.e. greater horseshoe, lesser horseshoe and Bechstein’s bats) and where recreational pressure is likely to lead to in-combination effects
- Standards for assessing developer proposals to retain, protect, buffer and maintain key bat habitats within application sites
- Principles for mitigating loss of habitat on greenfield sites, including an offsetting metric to determine size and quality of offset habitats to be created within allocations, and if necessary offsite
- Measures for offsetting effects of recreational pressure, taking into consideration latent capacity at existing non-woodland recreational sites and standards for new open spaces created within allocations
- An implementation plan for long term management and oversight arrangements for measures being implemented off site

2.3.4 The strategy will be sufficiently advanced during the examination to allow the Council to demonstrate that the plan is sound and will have no adverse effects on the SAC.

2.3.5 In light of submissions from prospective developers to increase housing density and the government’s ambition to make the best use of development land, the Council has tested the capacity of the allocations to accept further housing. As a result, housing at the following allocations in Trowbridge has been increased.

Table 1: Proposed capacity at site allocations

Site Ref	Site Name	Current proposed capacity	Proposed capacity Approximate number of dwellings
H2.1	Elm Grove Farm, Trowbridge	200	250
H2.2	Land off A363 at White Horse Business Park, Trowbridge	150	225
H2.3	Elizabeth way, Trowbridge	205	355
H2.5	Upper Studley, Trowbridge	20	45

- 2.3.6 The Council is working with Natural England and other local authorities in the West of England to develop a Local Bat Conservation Plan which would underpin planning guidance for the bat SACs in this area. This would lend weight to the individual approaches each authority is taking, ensure that the same basic principles were applied throughout and ensure that functional linkages between the SACs are recognised in the HRAs undertaken by these competent authorities. The urgency of this work, which is being driven by Natural England's aim to reduce the burden of regulation for developers and authorities alike, was emphasised by competent authorities at a meeting on 25 April 2018.
- 2.3.7 The Guidance for the North Somerset and Mendip Bats Special Area of Conservation (SAC)³ was adopted by North Somerset Council in January 2018. This document brings together a considerable body of research in relation to lesser and greater horseshoe bats which are features of this SAC and to that extent is also relevant to the Bath and Bradford on Avon Bats SAC.

3. DISCUSSION

3.1 Salisbury Plain SPA – Recreational Pressure

Effects alone

- 3.1.1 As a consequence of the 2015 visitor survey⁴, the radius for 75% of visitors accessing the plain was revised to 6.4km and the percentage of residents visiting the plain was revised to 1%. Although Land off the A363 at White Horse Business Park at Trowbridge (H2.2) and Barter's Farm Nurseries at Chapmanslade (H2.10) were screened out of the pre-submission appropriate assessment, closer examination shows these sites are within this radius and therefore they are now screened into it.
- 3.1.2 The inclusion of White Horse Business Park and Barters Farm Nurseries increases the number of estimated visits to the plain from 14.4 visits per day to 20.2 visits per day.
- 3.1.3 Within the overall context of the scale of growth proposed by the Core Strategy this small additional increase does not lead to the Plan to causing effects on the SPA alone.

Effects in-combination

- 3.1.4 The effects of in-combination growth arising from the Core Strategy are dealt with in the 'HRA and Mitigation Strategy for Salisbury Plain SPA'. In 2012⁵ this document concluded that the in-combination levels of growth proposed in the Core Strategy had the potential to lead to adverse effects on stone curlew due the fact this ground nesting bird was vulnerable to walkers, particularly dog-walkers. The document went

³ North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document. Adopted January 2018. North Somerset Council

⁴ Panter, C., & Liley, D. (2015) Salisbury Plain Visitor Survey 2015. Unpublished report by Footprint Ecology for Wiltshire Council

⁵ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreation pressure from redevelopment). Wiltshire Council March 2012

on to provide details of the proposed mitigation strategy to deal with in-combination effects.

- 3.1.5 Since the pre-submission HRA was completed, the 'HRA and Mitigation Strategy for Salisbury Plain SPA' has been revised⁶. The revision examines the effectiveness of mitigation measures to date and assesses the impact of additional housing which is coming forward under the Core Strategy as well as in-combination growth from other plans and projects including the Army Basing Project. A HRA for the latter project concluded no likely significant effect on the basis of a bespoke package of measures agreed with Natural England.
- 3.1.6 The review recognises that since 2002 there has been a steady increase in breeding success of stone curlew, measured as numbers of breeding pairs and young fledged per nest and the period 2012-2017 also reflects this trend. The conservation target for the SPA is to maintain the breeding population at or above 15 pairs. Over the last ten years the number of pairs has remained fairly stable at around 25 and it can therefore be concluded that the SPA is in favourable condition in respect of this target. Although not a target, the productivity figure of 0.61 birds per pair is used as an indication of whether the population is maintaining itself. In 2017 the productivity on the SPA was 0.65 after a period of 5 years when the figure was about 0.55. It appears that breeding on agricultural land outside the SPA where the productivity is higher is helping to support the SPA population and this has been recognised for a number of years. Overall the revised 'HRA and Mitigation Strategy for Salisbury Plain SPA'⁷ concludes that the SPA remains in favourable condition and there is no evidence that increased visitor numbers are having an impact.

Mitigation

- 3.1.7 The current mitigation strategy funds an ornithologist to survey breeding stone curlew on Salisbury Plain up to a 2km outside the SPA boundary; provide advice to landowners on the timing of land management activities, and; collate data on breeding success. The review demonstrates that following delivery of almost half the growth proposed by the Core Strategy, the stone curlew population remains in favourable condition. The review therefore proposes the mitigation strategy continues to be funded at the same level to ensure the response of the stone curlew population to remaining growth is monitored. This approach is considered acceptable given that conservation measures to restore stone curlew are well understood and therefore the prospect of being able to reverse a decline if this is detected is good.

Implications for integrity test

- 3.1.8 The review of the 'HRA and Mitigation Strategy for Salisbury Plain HRA' demonstrates that a total of 17,375 dwellings are currently expected to be delivered within the visitor catchment during the period 2006 and 2026 as a result of planned growth in the core strategy and the Wiltshire Housing Site Allocations Plan. This

⁶ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreation pressure from residential development). Wiltshire Council May 2018

⁷ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreation pressure from residential development). Wiltshire Council May 2018

compares with 16,130 dwellings if the 2012 housing figures are reassessed using the latest visitor survey data. The review estimates that current planned growth will result in an additional 2,826 residents within the visitor catchment over and above those which would have resulted from the 2012 housing figures. Approximately 1% of these residents can be expected to visit the plain regularly, representing an additional 28 visits per day over and above those which would have resulted from the 2012 housing figures. To put this in context, planned growth would result in an estimated additional 1% of visitors over the plan period, compared to the 2012 housing figures.

- 3.1.9 The review concludes that planned growth as a result of the Core Strategy, the Wiltshire Housing Site Allocations Plan and Army Basing Project will not have an adverse effect on the integrity of the Salisbury plain SPA, either alone or in-combination there with other plans and projects.

Recommendation: Salisbury Plain SPA Recreational Pressure

There are no recommendations for changes to policies or supporting text in the Plan as a result of this addendum. The Council has updated the 'HRA and Mitigations Strategy for Salisbury Plain SPA' to take account of the latest visitor survey results and stone curlew monitoring. Natural England, the RSPB and MoD will be consulted on this revision.

3.2 River Avon SAC - Phosphate

Effects alone and in-combination

- 3.2.1 The pre-submission HRA identified that the Lower Avon and Upper Wylde (headwaters) sub-catchments were high risk, i.e. development within the headroom of sewage treatment works could compromise the delivery of the interim progress goals as there was a risk that increased growth would not be offset by reductions in diffuse agricultural phosphate.

- 3.2.2 This risk was extended to the whole catchment when the EA and NE issued a joint interim position statement that said:

"Evidence suggests that the targets in the Hampshire Avon nutrient management plan are unlikely to be delivered by 2021. We are modelling what this means for the Nutrient Management Plan, and will be providing recommendations in March 2019.

We know that there will be new development and we advise that the new development within the catchment of the Hampshire Avon needs to be "phosphate neutral". We will work with you to help you demonstrate how that can be best achieved." (Email from EA to WC, NFDC and East Dorset/Christchurch Council, 9th March 2018)

- 3.2.3 As a consequence, any development within the River Avon (Hampshire) catchment has the potential to give rise to impacts alone and in-combination with other developments on the River Avon SAC. Allocations at Warminster, Salisbury and

Durrington must therefore demonstrate that they will be phosphate neutral in order to demonstrate there will be no adverse effect from development.

Implications for integrity test

- 3.2.4 The Council, Natural England (NE), the EA, Wessex Water PLC, New Forest District Council, New Forest National Park Authority and Christchurch and East Dorset Council are making constructive progress, and developing a Memorandum of Understanding (MoU) which will be available to support submission of the Plan. It will describe how each local planning authority will ensure that development is 'phosphate neutral', and will define 'phosphate neutral'.
- 3.2.5 The MoU will cover an interim period until the end of the financial year of the next Water Industry Asset Management Plan (AMP) 2025-2030. After this date it is likely measures can be replaced by those secured through the next Periodic Review (PR24) process and implemented under Wessex Water's Asset Management Plan (AMP). The period may end sooner as a result of new evidence, an early start on implementing PR24 measures in the AMP or an alternative approach (such as measures secured through a revised NMP for the catchment).
- 3.2.6 A main component of the approach is agreement on the nature, extent and delivery means for measures that will help to off-set the additional phosphorous load arising from development. These will be set out in an annex to the NMP (Annex 2).
- 3.2.7 Both EA and NE take the view that the approach and commitments contained in the MoU provide greater certainty with respect to nutrient management, sufficient for the Council to conclude that the Plan will support phosphate neutral development that is unlikely to have adverse effects upon the integrity of the SAC. This staged approach has been taken on their advice and recognises the need to maintain rates of housing delivery where there is a good prospect that environmental constraints will be overcome. The MoU will commit the parties to delivering phosphate neutral development. It is anticipated that this will include:
- Imposing a condition on all planning permissions for new dwellings requiring construction to the Building Regulations optional requirement for a maximum water use of 110 litres per person per day.
 - To have a draft Annex 2 within three months of the MoU being signed.
 - To use appropriate developer contributions to secure measures identified in Annex 2 sufficient to ensure that all development permitted up to 2025 is phosphate neutral. Thereafter it is expected that Wessex Water will have agreed measures to reduce phosphate as part of its asset management plan for 2025-2030, as water customers, rather than developers, are the more appropriate funders of water treatment in the long term.
- 3.2.8 The Wiltshire Council Community Infrastructure Levy (CIL) Regulation 123 list expressly includes an item to support the 'Nutrient Management Plan – to address the level of phosphate in the River Avon.' Annex 4 to the NMP already provides some estimates of costs for off-setting measures and it is clear that together local planning authorities in the catchment are capable of funding off-setting measures for

as long as they are needed. The MoU will list the measures currently under consideration.

Recommendation: River Avon SAC - phosphate

An agreed form of wording with the EA and NE should be inserted into the Plan to provide greater certainty over the need to provide for phosphate neutral development. The MoU should be finalised as a matter of priority before submission to support this HRA addendum.

3.3 Bath and Bradford on Avon Bats SAC - habitat loss / deterioration

Effects alone

- 3.3.1 In its consultation response, Natural England has questioned whether the housing numbers in the Plan are deliverable, as in the absence of bat surveys and mitigation standards the capacity of the allocations is uncertain. Alternatively, in order to achieve housing numbers, key habitats might be lost thus leading to impacts alone.
- 3.3.2 Developers will be required to undertake bat surveys to support applications at Trowbridge but it must be recognised that due to the difficulties with detecting horseshoe and Bechstein's bats, a precautionary approach will need to be taken in determining what constitutes key bat habitat. Habitats such as hedgerows, tree planting and streams will be assumed to be of key importance to bats within the consultation zones⁸ and also outside them where strategic routes may link important roosts. Specific habitats have been identified for each site at Trowbridge in the Plan. Other habitats at allocation sites may also be of significance as identified in evidence gathered for the North Somerset and Mendip Bats SAC and that guidance will be referred to in assessing the overall impact of development at the allocation sites.
- 3.3.3 Increasing the housing numbers at four allocations in Trowbridge would take the number of dwellings proposed at Trowbridge from 800 to 1100 on greenfield sites. The implications of increases at each site are as follows:
- a. At Elm Grove (H2.1) the allocation boundary has been extended to include open space adjacent to Elm Grove Farm resulting in greater green field land take to accommodate the additional 50 dwellings proposed.
 - b. Land off the A363 at White Horse Business Park (H2.2) has potential significance as a strategic link for bats moving east-west between woodland breeding sites in the south and the SAC to the north. For a strategic link to be maintained, it is likely that hedgerows would need to be maintained within a field matrix rather than an urbanised development. This may reduce the scope to increase the urban footprint when increasing the layout from 150 to 225 dwellings.
 - c. The allocation at Elizabeth Way (H2.3) has been increased from 205 to 355 dwellings. Below Middle Lane the allocation lies within the consultation area for

⁸ Bat Special Areas of Conservation (SAC): Planning Guidance for Wiltshire. Issue 3.0, 10 September 2015, Wiltshire Council

Bechstein's bats and it seems that an increase of this scale could require this area to become partly urbanised.

- d. At Upper Studley (H2.4) the increase from 20 to 45 dwellings could bring dwellings closer to the mature trees along the Lambrok stream. The wooded stream is likely to be a historical commuting and foraging route and could be of potential strategic importance for SAC bats. Increased development could extend the effects of urban lighting towards this habitat and in due course, retaining the habitat could conflict with the amenity and health and safety concerns of residents.

Effects in-combination

- 3.3.4 In-combination effects would occur where there is loss of habitat which at a site level is of low significance but which cumulatively could lead to impacts at a landscape scale. Such habitats could include grassland and arable habitats. The effects of such habitat loss could occur in combination with the residual effects after mitigation of development at Ashton Park and to a much lesser extent with windfall development which will be constrained to brownfield sites within the settlement boundary. In addition, development at Drynham Lane which forms the final part of the strategic allocation for Trowbridge may give rise to in-combination effects. That development is currently at the application stage and can only be permitted if it can be concluded there will be no effects alone and in-combination with other plans and projects.

Mitigation

- 3.3.5 The Trowbridge Bat Mitigation Strategy is being prepared by a specialist consultancy and phase 1 will be available to support the Plan through the examination. NE has been involved in its scoping and is supportive of the Council's approach. The work being undertaken is complex and requires iterative consultation with bat experts and planners to test the deliverability of proposals. The overall approach will be to safeguard key habitat features on site and offset the loss of others by creating new habitat according to a metric. This type of approach is being pursued by NE in relation to other protected species and underpins the Local Bat Conservation Plan for the West of England.
- 3.3.6 The Council recognises that delivering habitat offsetting through local authorities is still in its infancy. In order to de-risk phase 1 of the strategy, the Council anticipates that the majority of habitat offsetting for the Wiltshire Housing Site Allocations Plan will occur within the allocations sites themselves and only to a limited extent will developers rely on offsite provision. The second phase of the TBMS will support development beyond the current Core Strategy using lessons learned from phase 1 to expand offsetting in line with the NE approach as appropriate.
- 3.3.7 In relation to habitat loss/deterioration, Phase 1 of the TBMS will:
 - Identify two zones of potential habitat impact. A high risk zone will be based on evidence gained from in depth studies of Bechstein's bats at Trowbridge and elsewhere. Only development of a very minor nature would be permitted in this zone and any allocations which could have encroached into it have already been

screened out through the pre-submission HRA. A medium risk zone will identify areas which can only be developed where habitat offsetting is provided either on or offsite. The metric for offsetting will be defined in the TBMS.

- Define the parameters to be used in designing schemes which retain, protect, buffer and maintain potential bat habitat already existing within the allocation sites. The parameters will include for example, stand-off widths, the degree to which breaches for access roads may be acceptable and lighting standards.
- Develop a metric and offsetting strategy to allow lost habitats such as grassland and arable habitats to be offset by the creation of new habitats either within or outside the allocation site. Strategic locations will be identified for each SAC species where any offsite habitat creation would be located in order to have maximum ecological benefit. Funding will be required for long term management and ongoing oversight and this could be secured through S106 or potentially CIL if TBMS projects are added to the CIL regulation 123 list.
- Undertake sensitivity testing to understand the effects of different scales of windfall development for recreational pressure on the woodlands.

Implications for the Integrity Test

3.3.8 The capacity of housing allocations has been calculated on the basis of 30 dph and excludes parts of the sites that are undevelopable due to environmental and heritage constraints. In principle, the density of development at each site could be increased without leading to impacts alone as long as it can be demonstrated that:

- The principles in the TBMS for protecting key bat habitat on site can be met
- The landscape remains porous to bat movements to the same extent after development as it was prior to development

3.3.9 As outlined above, adverse effects may arise from increasing scales of development envisaged on each allocation. However, these have each been reviewed in the light of the possible effects that have been identified and it has been concluded that likely individual effects can be mitigated. Original estimates in the pre-submission draft Plan were based on a low density and there will be only marginal or no change to the footprint of development and the extent to which it may impinge upon habitat areas. The TBMS will guide design and layout so that effects are mitigated, if necessary offsite, and no additional safeguards need to be incorporated into the Plan.

3.3.10 In view of the fact that the bats response to development is likely to be delayed and difficult to ascertain with confidence, this could suggest a need for phasing further development over and above the current draft and adopted allocation that might arise from the Local Plan Review. Otherwise there would be a risk that the capacity of the area to support the internationally important population of Bechstein's bats may be exceeded and as a result have significant adverse effects on the integrity of the SAC. However, this would be a matter for the Review to resolve and is not necessary to progress in this Plan.

3.3.11 In conclusion, the amendments to the Plan can be accommodated by the TBMS and it is therefore possible to conclude there will be no loss of integrity to the SAC.

3.4 Bath and Bradford on Avon Bats SAC – Recreational Pressure

Effects Alone

3.4.1 A detailed examination was made of the risks of locating development within easy walking distance of the woodlands in the pre-submission HRA. As a result, the closest allocations were removed at the screening stage such that none of the allocations is expected to give risk to significant recreational impacts alone.

Effects in-combination

3.4.2 A detailed discussion was provided in the pre-submission HRA of developments which could have in combination effects with the Plan. The main in-combination project will be Ashton Park, which was resolved to approve at committee in April 2018. This will deliver 2500 new homes over the next 15 years and is required to implement a complex and wide reaching mitigation strategy which focuses on intensive wardening at the woodlands and extensive provision of new habitats to provide an alternative to visiting the woodlands and to offset loss of bat habitat. The application went through a lengthy HRA process which concluded there would be no adverse effects. Nevertheless, the potential for residual effects could not be discounted.

Mitigation

3.4.3 Phase 1 of the TBMS will address in combination recreational effects of the Plan and residual effects arising from the Core Strategy allocation comprising Ashton Park and, in due course, any permission which is granted at Drynham Lane.

3.4.4 In relation to recreational pressure Phase 1 of the TBMS will:

- Use data from the 2017 visitor survey of open spaces in Trowbridge⁹ to identify two zones of potential recreational impact. A high risk zone will be identified where recreational impacts may lead to impacts alone or in-combination and only development of a very minor nature would be permitted. A medium risk zone will identify where contributions will be made to offsite recreational mitigation measures and / or provision will be made within allocation sites over and above the standard open space requirements.
- Identify a number of projects which will be funded by contributions towards offsite recreational mitigation. These would represent new provision at existing sites rather than maintenance of existing facilities. The latent capacity at existing non-woodland recreational sites will be assessed with a view to identifying how contributions from smaller schemes could be used to increase their capacity and attractiveness.
- Identify the criteria by which new recreational provision on allocation sites will be assessed as being adequate to offset recreational pressure on the woodlands.
- Put forward an implementation plan, including a long term management plan and funding and oversight arrangements for measures being implemented offsite.

Implications for integrity Test

⁹ Panter, C., Lake, S. & Liley, D. (2107). Trowbridge Visitor Survey and Recreation Management Strategy. Unpublished report by Footprint Ecology for Wiltshire Council

- 3.4.5 The increased housing numbers at four sites in combination with windfall applications will have some effect on the extent to which recreational pressure can be absorbed. At this stage, these increases are unlikely to have significant additional effects although this will need to be tested through the TBMS Phase 1.
- 3.4.6 The development of Ashton Park generates a specific in-combination effect. Phase two of the TBMS will explore how further phases of development beyond 2026 will not lead to adverse effects on the SAC in-combination. Detailed delivery of further housing will need to be preceded by a review of the effectiveness of the TBMS Phase 1 and the Ashton Park mitigation strategy.
- 3.4.7 In conclusion, the amendments to the plan can be accommodated by the TBMS and it is therefore possible to conclude there will be no loss of integrity to this SAC.

Recommendation: Bath and Bradford on Avon Bat SAC – Habitat loss / deterioration and Recreational Pressure

There are no recommendations for changes to policies or supporting text in the Plan as a result of this addendum.

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1. Background

- 1.1 The draft Wiltshire Housing Site Allocations Plan ('draft WHSAP') has been prepared in the light of relevant legislation¹ and national policy². However, through the formal pre-submission consultation process, Historic England submitted representations that identified concerns with the Council's evidence base in terms of how it had assessed, where relevant, the significance of heritage assets, including any contributions made by their setting.
- 1.2 Historic England did not raise any 'show-stopper' concerns through their representation. Nevertheless, they were concerned about the potential scale of effects that would be attributable to development proceeding on certain site allocations where the risk of harm to designated and non-designated heritage assets represents a key consideration. In this regard, they advised that the draft WHSAP should address heritage matters head-on and not delegate the need for detailed assessments to be undertaken at the planning application stage.
- 1.3 It was agreed with Historic England that a proportionate assessment of six of the proposed allocations would be undertaken to bolster the evidence base. Consultants were commissioned to undertake a Heritage Impact Assessment (HIA)³. The report produced is robust and adds to the Council's understanding of the various heritage assets associated with the six sites appraised. In this regard, it is a helpful piece of work as it provides a deeper understanding of heritage constraints.
- 1.4 The HIA appropriately addresses the statutory and national planning policy advice. Indeed, it takes a conservative and precautionary approach to the assessment of heritage assets and the degree to which their significance would potentially be harmed by development proceeding. Of the six sites assessed, the proposed allocations at Upper Studley (H2.4) and Church Lane (H2.5) on the urban edge of Trowbridge and adjacent to H2.6 – Southwick Court are considered to be low risk in terms of the scale of harm to the significance of heritage assets and can therefore proceed as allocations. However, the report establishes that significant challenges would likely be generated if development proceeds in respect of the other four sites at:
- Southwick Court, Trowbridge (H2.6);
 - Land off the A363 at White Horse Business Park, Trowbridge (H2.2);
 - East of The Dene, Warminster (H2.7); and
 - Land North of Netherhampton Road, Salisbury (H3.3).
- 1.5 What follows is a summary of the HIA advice as it applies to these four sites.

¹ Planning (Listed Buildings and Conservation Areas) Act 1990, Sections 66(1) and Section 72(1)

² National Planning Policy Framework, March 2012

³ Wiltshire Housing Site Allocations Plan - Heritage Impact Assessment, Land Use Consultants, March 2018

2. H2.6 - Southwick Court, Trowbridge

- 2.1 The HIA acknowledges that the proposed allocation (H2.6) is set within the vicinity of the Grade II* listed Southwick Court farmstead complex (including the medieval moat and gatehouse). The significance of this very important heritage asset and its functional relationship with surrounding, non-designated but somewhat degraded water-meadows and wider agrarian landscape is firmly acknowledged in the HIA and the draft WHSAP.
- 2.2 The HIA recommends that development of the entire proposed allocation would sever Southwick Court from its historic, economic agrarian context. The nature and extent of the contribution of the setting to Southwick Court is understood to make the historic landscape within and around the proposed allocation particularly sensitive to change, a point acknowledged in the draft WHSAP at paragraphs 5.78 and 5.79.
- 2.3 Taking a precautionary position on these matters, the HIA notes that applying mitigation by design to minimise harm would not be a realistic option if delivery of significant numbers of houses on site are proposed.
- 2.4 The overall assessment of likely effects associated with development proceeding on the proposed allocation is considered to be significant. Indeed, based on an assessment of potential cumulative effects on the relationship between the various assets that comprise Southwick Court and its agrarian connections, the scale of harm of development proceeding is conservatively assessed as approaching substantial.
- 2.5 The starting point for the assessment of whether a proposal would cause substantial harm to a heritage asset is the consideration of impact on its significance. Significance derives from the physical presence of a heritage asset and the contribution made by its setting. It is the degree of harm to the asset's significance rather than the scale of development that is to be assessed when determining the scale of harm. In this context, a judgement of substantial harm would likely result from:
- total loss of a heritage asset; or
 - physical damage to an asset; or
 - the insertion of development within the setting of an asset that would significantly alter the experience, or interpretation of an asset.
- 2.6 Whilst presenting an appropriate, conservative and precautionary approach to addressing the significance of heritage assets, the HIA does not state that substantial harm would be caused by development proceeding on the proposed allocation. In fact, the assessment concludes that less than substantial harm would likely result, albeit at a perceived higher end of the less than substantial harm scale.
- 2.7 It is clear that development of the proposed allocation will be significantly challenging. However, the decision to allocate this site (and all sites the

subject of the HIA) is based on a balance of a range of factors, where heritage is afforded special regard.

- 2.8 As outlined in the draft WHSAP, it is considered that appropriate urban design measures would need to be employed to lessen the scale of likely impacts associated with developing the eastern half of the site for housing. Indeed, based on such measures being delivered as part of a comprehensive and sensitively planned development, a range of significant public benefits would be accrued (e.g. the delivery of housing locally, a boost to affordable housing, habitat creation, generation of Community Infrastructure Levy etc). These undeniable benefits are considered capable of satisfying the test set out in paragraph 134 of the Framework and would significantly outweigh the less than substantial harm to heritage assets.

3. H2.2- Land off the A363 at White Horse Business Park, Trowbridge

- 3.1 In a similar vein to the proposed Southwick Court site, the proposed allocation H2.2 presents a challenge in terms of managing the risk of harm to the significance of heritage assets and their respective settings. The HIA assesses such matters in a robust manner. Five heritage assets are identified as being sensitive to change and would potentially be affected if development proceeds:

- Baptist burial ground – Grade II listed gateway and perimeter walls (curtilage listed);
- Kings Farmhouse – Grade II listed building and associated agricultural connections;
- Willow Grove – Grade II listed building and associated agricultural connections;
- Little Common Farm – non-designated, but closely related in agricultural terms to neighbouring farmsteads; and
- Manor Farm – Grade II listed building to the south of proposed site with potential for development to lead to setting changes

- 3.2 The HIA considers that the current landscape structure of relatively large fields enclosed by hedgerows would offer few easy options for mitigating harm to these heritage assets. However, the assessment concludes that development of whole allocation would result in less than substantial harm to the four designated heritage assets. That said, the level of change that would be introduced by development proceeding would be significant and thereby capable of eroding the legibility of the relatively intact post-medieval agricultural landscape, which in turn informs the character of North Bradley.

- 3.3 As the designated assets are essentially clustered in the south-eastern half of the site, the report considers that development should be concentrated in the north-east end of the site. Such an approach would help conserve the relationships between the local farmsteads and still deliver a reasonable developable area.

- 3.4 Moreover, and as outlined in the draft WHSAP, with the application of appropriate urban design measures, including significant bolstering of existing green infrastructure to help support protected bat species, a sensitively planned development could minimise harm to the significance of heritage assets and character of North Bradley village.
- 3.5 In addition, development would likely deliver significant public benefits (e.g. the delivery of housing locally, a boost to affordable housing, habitat creation, generation of Community Infrastructure Levy etc) capable of satisfying the test set out in paragraph 134 of the Framework and thereby significantly outweigh the less than substantial harm to heritage assets.

4. H2.7 - East of The Dene, Warminster

- 4.1 As outlined in the draft WHSAP, the development of this proposed allocation would be challenging from a heritage perspective. The site is complex and clearly relates to a number of designated and non-designated heritage assets including:
- Bishopstrow House – Grade II listed building and associated designed landscape/agricultural setting;
 - Bishopstrow Home Farm ('model farm' complex) – non-designated farmstead and associated agricultural setting;
 - Bishopstrow Conservation Area – potential for development to affect the setting of the Conservation Area;
 - 196/198 Boreham Road – non-designated dwellings of historic character;
 - An area of high archaeological potential; and
 - Potential loss of a section of historic walling along the Boreham Road.
- 4.2 As outlined in the draft WHSAP, the development of southern half of the site would likely lead to significant effects on the setting of Bishopstrow House and Bishopstrow Home Farm and this is highlighted in the HIA. The report considers the scale of effects on individual heritage assets arising from developing the site would be high and difficult to mitigate. Moreover, the challenge for developing the site essentially arises when the scale of effects is considered in a cumulative manner. In this sense, the report takes a precautionary approach and conservatively considers harm would be significant, but nonetheless less than substantial.
- 4.3 As outlined in the draft WHSAP, the site will need to be sensitively planned to give special regard to conserving the significance of local heritage assets and thereby deliver appropriate urban design measures to lessen the scale of likely impacts. Indeed, based on such measures being delivered, a range of significant public benefits would also be accrued through developing the site (e.g. the delivery of housing locally, a boost to affordable housing, habitat creation, generation of Community Infrastructure Levy etc). These benefits are therefore considered capable of satisfying the test set out in paragraph

134 of the Framework and would significantly outweigh the less than substantial harm to heritage assets.

5. H3.3 - North of Netherhampton Road, Salisbury

- 5.1 There are no designated heritage assets within the proposed allocation site, but the site nonetheless has a functional relationship with recorded archaeological features and non-designated water-meadows. The draft WHSAP acknowledges that the proposed allocation is situated in a sensitive location on a key approach to the City of Salisbury where relatively uninterrupted, long distance views of the internationally significant Cathedral are important considerations in heritage terms. The HIA therefore takes a holistic approach and considers these issues within the context of the City of Salisbury Conservation Area Appraisal and Management Plan (2014), rather than just the heritage significance of the Cathedral.
- 5.2 The HIA considers that development would likely result in substantial harm to / loss of archaeological remains on site. However, it is considered unlikely that this would constitute a major constraint to development provided a precautionary approach is taken (e.g. undertaking detailed field evaluations to support a subsequent planning application).
- 5.3 Development would potentially reduce or remove visibility of the Cathedral Spire and thereby conflict with the objective to conserve the key characteristics of the Conservation Area. The extent to which this effect could be considered to be harmful to the heritage significance of the Cathedral itself is debatable, as longer views of the Spire from the west would remain available.
- 5.4 However, applying a precautionary approach would suggest that it would be unlikely that the effects of development could be entirely avoided, or totally mitigated and hence development would likely be considered as conflicting with the requirement to conserve strategic views set out in the City of Salisbury Conservation Area Appraisal and Management Plan. That said, the HIA is silent on the scale of harm to the significance of heritage assets, albeit there would be no direct impact on the Cathedral itself and archaeology would not be a sufficient reason to stop development. Therefore, the conclusion one reasonably draws in this circumstance is that in an overall sense, the scale of harm can only be described as being less than substantial.
- 5.5 The report recognises that the nature, scale (particularly height and massing) and location of development would be critical considerations in determining the precise levels of impact. Therefore, as anticipated by the draft WHSAP, development of the site will need to be sensitively planned to give special regard to the significance of local heritage assets and thereby deliver appropriate urban design measures to lessen the scale of likely impacts. Indeed, based on such measures being delivered, a range of significant public benefits would also be accrued through development. Whilst the HIA is silent of the assessment of harm, these benefits are considered to be significant within the overall planning balance.

5.6 Therefore, if less than substantial harm can be definitively demonstrated, the scale of public benefits (e.g. the delivery of housing locally, a boost to affordable housing, habitat creation, generation of Community Infrastructure Levy etc) would be capable of satisfying the test set out in paragraph 134 of the Framework and thereby significantly outweigh the less than anticipated less than substantial harm to heritage assets.

6. Considerations

6.1 The degree of harm to the significance of heritage assets brought about by developing each of the six sites appraised through the HIA is considered to be less than substantial. However, in the case of the four sites detailed above, the scale of likely harm associated with such development would nonetheless be of a more severe nature. In the light of this evidence consideration needs to be given to how the Council proceeds.

6.2 One option would be to bolster the policy considerations already set out in the draft WHSAP through a set of proposed changes that will then be considered through the independent Examination process. A second option would be to simply recommend to the appointed Inspector that the Council wishes to remove the proposed allocations in question on heritage grounds alone and thereby not consider the benefits that would undoubtedly accrue from development.

6.3 If the four proposed site allocations are recommended for removal prior to the examination, the net effect will be to weaken the draft WHSAP and thereby undermine one of its purposes, namely – the timely delivery of housing to maintain local supply. In this circumstance, the Council will likely need to provide contingency measures to address the loss of housing.

6.4 Whilst a case could be made to recommend the deletion of all four sites, a counter case will undoubtedly be made by the proponents of these sites. In this context, the HIA is a helpful piece of work in terms of furthering our understanding of heritage constraints. Indeed, based on the evidence gathered to date through the site assessment process, including that provided by the proponents of the sites through representations, the level of harm to the significance of heritage sites that may result through development proceeding is recognised as being a significant concern.

6.5 However, it is important to note that the assessments for all six sites essentially concludes that the potential scale of harm that would be generated because of development proceeding would be less than substantial. Therefore, the advice set out in paragraph 134 of the National Planning Policy Framework ('the Framework') would be engaged.

6.6 As defined by paragraph 134 of the National Planning Policy Framework, where a proposed development would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of development proceeding.

- 6.7 The need for housing, including affordable housing is recognised as being a priority of national and local policy. Moreover, addressing the need for housing in Trowbridge, Warminster and Salisbury goes to the heart of the strategy of this draft Plan. A public interest case can be demonstrated for proceeding with the proposed allocations, albeit the planning balance exercise that would flow through the determination of detailed development proposals would need to carefully consider a range of matters. In this regard, heritage impact is but one of many competing and important issues that need to be balanced through the planning system.

7. Conclusion

- 7.1 Having appraised all options in the light of the evidence prepared and submitted to date, it is considered that there is no justification for recommending the deletion of proposed site allocations on heritage grounds. However, in the light of the HIA, officers recommend that proposed changes be submitted alongside the draft Plan that emphasises and reinforces the special regard that must be applied to conserving heritage assets in a manner appropriate to their significance. These changes and the evidence relating to the proposed allocations will then be considered through the Examination.

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Wiltshire Housing Site Allocations Plan

Submission draft plan

Equalities Impact Assessment

May 2018

Wiltshire Council

Information about Wiltshire Council services can be made available on request in other languages including BSL and formats such as **large print** and audio. Please contact the council on **0300 456 0100**, by textphone on 01225 712500 or by email on customerservices@wiltshire.gov.uk.

如果有需要我們可以使用其他形式（例如：大字體版本或者錄音帶）或其他語言版本向您提供有關威爾特郡政務會各項服務的資訊，敬請與政務會聯繫，電話：0300 456 0100，文本電話：(01225) 712500，或者發電子郵件至：customerservices@wiltshire.gov.uk

يمكن، عند الطلب، الحصول على معلومات حول خدمات مجلس بلدية ويلتشرير وذلك بأشكال (معلومات بخط عريض أو سماعية) ولغات مختلفة. الرجاء الاتصال بمجلس البلدية على الرقم ٠٣٠٠٤٥٦٠١٠٠ أو من خلال الاتصال النصي (تيكست فون) على الرقم ٧١٢٥٠٠ (٠١٢٢٥) أو بالبريد الإلكتروني على العنوان التالي: customerservices@wiltshire.gov.uk

ولتشار کونسل (Wiltshire Council) کی سروسز کے بارے میں معلومات دوسری طرزوں میں فراہم کی جاسکتی ہیں (جیسے کہ بڑی چھپائی یا آڈیو) اور درخواست کرنے پر دوسری زبانوں میں فراہم کی جاسکتی ہیں۔ براہ کرم کونسل سے 0300 456 0100 پر رابطہ کریں، ٹیکسٹ فون سے (01225) 712500 پر رابطہ کریں یا customerservices@wiltshire.gov.uk پر ای میل بھیجیں۔

Na życzenie udostępniamy informacje na temat usług oferowanych przez władze samorządowe hrabstwa Wiltshire (Wiltshire Council) w innych formatach (takich jak dużym drukiem lub w wersji audio) i w innych językach. Prosimy skontaktować się z władzami samorządowymi pod numerem telefonu 0300 456 0100 lub telefonu tekstowego (01225) 712500 bądź za pośrednictwem poczty elektronicznej na adres: customerservices@wiltshire.gov.uk

Equality Analysis Evidence Document					
Title: What are you completing an Equality Analysis on?					
Submission Draft Wiltshire Housing Site Allocations Plan (the draft Plan)					
Why are you completing the Equality Analysis? (please tick any that apply)					
Proposed New Policy or Service Yes – new planning policies.	Change to Policy or Service		Service Review		
Version Control					
Version control number	3	Date	27 6 17	Reason for review (if appropriate)	
Version control number	4	Date	30-4-18	Reason for review (if appropriate)	Further work has been carried out to produce a submission version draft Plan which will be submitted to the Secretary of State for Examination.
Risk Rating Score (use Equalities Risk Matrix and guidance) **If any of these are 3 or above, an Impact Assessment must be completed. Please check with equalities@wiltshire.gov.uk for advice					
Criteria		Inherent risk score on proposal		Residual risk score after mitigating actions have been identified	
Legal challenge		4		1	
Financial costs/implications		3		1	
People impacts		2		1	
Reputational damage		3		1	

Section 1 – Description of what is being analysed

A planning policy document, the Wiltshire Housing Site Allocations Plan (hereafter referred to as the draft Plan), is being prepared for the purposes of maintaining and ensuring both surety and continuity of housing land supply across Wiltshire, and thereby is supporting the implementation of the Wiltshire Core Strategy (WCS). A separate and complimentary document, the Chippenham Site Allocations Plan, addresses the identification of land for strategically important housing and employment sites at Chippenham. The draft Plan sits directly under the Wiltshire Core Strategy. The draft Plan has now reached submission stage and subject to endorsement by Cabinet and approval by Council will be submitted to the Secretary of State for Examination. The duty to carry out an Equalities Impact Assessment is set out in the Equality Act 2010¹. The Equalities Impact Assessment is classified under Regulation 22 (1) (e) as a supporting document which in the Council's opinion is relevant to the preparation of the local plan.

The National Planning Policy Framework² sets out the following requirements which have been met by the draft Plan:

- Paragraph 50. To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).
- Paragraph 69. The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans.
- Paragraph 155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively.

It is the purpose of this draft Plan to implement the framework set by the WCS by allocating additional housing sites across Wiltshire in accordance with the settlement strategy as outlined in Core Policy 1. In this respect it should be noted that the draft Plan is only seeking to address the indicative housing requirement of 36,950 dwellings (excluding Chippenham Town and West Swindon) as expressed in Table 1 of Core Policy 2 of the WCS through allocating housing sites across the Wiltshire in accordance with the spatial strategy for the period up to 2026. In addition, the draft Plan assesses the existing "settlement boundaries" or "Limits of Development" as they are referred to in Core Policy 2.

In planning for future housing numbers the proposals of this draft plan will be in line with the Wiltshire Core Strategy suite of policies and will seek to:

- Provide for the most sustainable pattern of development that minimises the need to travel and maximises the use of sustainable transport.
- Align residential development to the employment growth planned for in the WCS, in order to achieve a greater self-containment of communities and not intensify out commuting.
- Manage development to ensure the timely delivery of supporting infrastructure to mitigate the impact of growth on local services and facilities.

¹ Sections 1 and 149 of the Equalities Act 2010.

² <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- Protect, and where possible enhance, the natural, historic and built environment within and surrounding settlements whilst recognising development on the periphery of settlements is inevitable.
- Respect the individual identities of villages, towns and cities within the landscape setting and their relationship to one another through careful site selection and requiring high quality design and landscaping.
- Deliver affordable housing as a proportion of the housing development in line with Core Policy 42 of the Wiltshire Core Strategy which requires 30-40% of housing to be affordable.

Section 2A – People or communities that are currently **targeted or could be affected** by any change (please take note of the Protected Characteristics listed in the action table).

The overarching strategy of the WCS is to deliver homes, infrastructure, services and employment opportunities to meet the needs of all who live, work and visit Wiltshire and the draft Plan will help to deliver that strategy.

The draft Plan has been developed in an open and collaborative manner in line with the Council’s Statement of Community Involvement³:

A record of the consultation that has taken place can be found in the Statement of Early Community Engagement June 2017, and associated reports and the Regulation 22 (1) (c)⁴ Report⁵. To date it has included the following consultations:

Consultation	Date	Who was consulted
Formal Regulation 18 consultation on the scope.	24 th March – 5 th May 2014	All listed below
Informal consultation draft proposals for amending settlement boundaries.	28 th July – 22 nd September 2014	Town and parish councils
Informal consultation on the site assessment methodology and initial site options.	23 rd February – 31 st March 2015	Town and parish councils Developers Specialist bodies
Informal consultation on the approach to large villages.	30 th June – 12 th August 2015	Town and parish councils Developers Specialist bodies
Landowner Deliverability Consultation.	21 st August – 2 nd October 2015	Landowners
Formal consultation on the draft Wiltshire Housing Site Allocations DPD.	14 July – 22 September 2017	All listed below
Examination.	TBC	TBC

The consultations are based on the Wiltshire Council spatial planning database, national legislation and national policy advice, and specialist knowledge within the organisation. This

³ <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/statementofcommunityinvolvement.htm>.

⁴ Town and Country Planning (Local Planning) (England) Regulations 2012

⁵ The consultation statements can be found on the following link:

<http://www.wiltshire.gov.uk/planningpolicydocuments.htm?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD>

includes:

- All citizens who have requested contact
- Local town and parish councils
- All elected representatives
- The Environment Agency
- English Heritage
- Natural England
- Network Rail
- Highways England
- Relevant health providers
- Relevant water and sewerage providers
- Homes and Communities Agency
- Voluntary bodies some or all of whose activities benefit any part of the local planning authority's area
- Bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area
- Bodies which represent the interests of different religious groups in the local planning authority's area
- Bodies which represent the interests of disabled persons in the local authority's area
- Bodies which represent the interests of persons carrying on business in the local planning authority's area

As well as the standard local, regional and national consultees, for the draft Plan the following hard to reach groups were consulted:

- Young Persons Council
- Friends Families and Travellers
- The Showman's Guild of Great Britain
- Selwood Housing Society
- SCOPE - Partnership & Community Development Division
- Kennet and Avon Boating Community
- Diabetes UK Wiltshire

All the above groups can be directly affected by the volume, location and design of new homes in Wiltshire. The techniques used to ensure effective engagement are covered in Section 3 below.

Section 2B – People who are **delivering** the policy or service that are targeted or could be affected (i.e. staff, commissioned organisations, contractors)

The draft Plan contents were discussed at various meetings with the Council's development management officers and specialist areas such as conservation, highways and archaeology. Those elsewhere in the Council affected by or involved in the delivery of the draft Plan were primarily involved in the preparation of relevant evidence papers on site selection by providing information and by establishing requirements for policies and proposals.

Section 3 –The underpinning **evidence and data** used for the analysis (Attach documents where appropriate)

Prompts:

- What data do you collect about your customers/staff?
- What local, regional and national research is there that you could use?
- How do your Governance documents (Terms of Reference, operating

procedures) reflect the need to consider the Public Sector Equality Duty?

- What are the issues that you or your partners or stakeholders already know about?
- What engagement, involvement and consultation work have you done? How was this carried out, with whom? Whose voices are missing? What does this tell you about potential take-up and satisfaction with existing services?

Are there any gaps in your knowledge? If so, do you need to identify how you will collect data to fill the gap (feed this into the action table if necessary)

The context for the evidence and data used to inform this process is set within the National Planning Policy Framework at paragraph 158:

Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

All parts of the draft Plan are based on the collation and analysis of evidence, including the evidence base studies that underpin the WCS and an evidence base dealing specifically with the delivery of housing.

The draft Plan is based on sound research and analysis to identify the challenges faced in site allocation. All conclusions reached in the draft Plan are founded on analysis of the evidence, which is available for scrutiny.

The evidence behind the site allocation process is published for each Community Area in the form of Community Area Topic Papers. A number of other evidence based topic papers are published alongside the community area topic papers and include:

- Topic Paper 1 - Settlement Boundary Review Methodology (Updated May 2018)
- Topic Paper 2 – Site Selection Process Methodology June 2017
- Topic Paper 3 – Housing Land Supply June 2017
- Addendum to Topic Paper 3 - Housing Land Supply May 2018
- Topic Paper 4 – Developing Plan Proposals June 2017
- Addendum to Topic Paper 4 - Developing Plan Proposals May 2018
- Assessment of Viability, BNP Paribas, June 2017
- Sustainability Appraisal Report, Atkins, updated May 2018
- Assessment under the Habitat Regulations June 2017
- Duty to Cooperate Report June 2017
- Addendum to the Duty to Cooperate Report May 2018
- Statement of Early Community Engagement June 2017, and associated reports
- Regulation 22 (1) (c) Report of Pre-Submission Consultation Summer 2017
- Heritage Impact Assessment, LUC, March 2018
- Draft Trowbridge Transport Strategy Refresh 2018
- Draft Salisbury Transport Strategy Refresh 2018
- Addendum Assessment under Habitats Regulations

The draft Plan is supported by a Sustainability Appraisal (as referred to above) prepared by Atkins which is an evidence tool to assess and inform the development of the draft Plan. The Sustainability Appraisal promotes sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

***Section 4 – Conclusions** drawn about the impact of the proposed change or new service/policy

Prompts:

- What actions do you plan to take as a result of this equality analysis? Please state them and also feed these into the action table
- Be clear and specific about the impacts for each Protected Characteristic group (where relevant)
- Can you also identify positive actions which promote equality of opportunity and foster good relations between groups of people as well as adverse impacts?
- What are the implications for Procurement/Commissioning arrangements that may be happening as a result of your work?
- Do you plan to include equalities aspects into any service agreements and if so, how do you plan to manage these through the life of the service?
- If you have found that the policy or service change might have an adverse impact on a particular group of people and are **not** taking action to mitigate against this, you will need to fully justify your decision and evidence it in this section

The actions necessary to be delivered as part of this equality assessment are those enshrined within the strategy. The strategy will have a significant positive impact on the large majority of the communities in Wiltshire. The draft Plan attempts to tackle existing inequalities highlighted in the evidence base, including in the Strategic Housing Market Assessment, through the delivery of the following outcomes:

- Enabling the delivery of a significant amount of affordable housing and increased access for all to a decent affordable home. The housing sites delivered will include a proportion of affordable housing in line with Core Policy 42 of the Core Strategy which requires 30-40% of housing to be affordable.
- Enabling the delivery of improved and accessible services and infrastructure for the benefit of all members of the community. This includes the provision of new primary school provision to support new housing where necessary.
- Undertaking consultation exercises which engages minority and hard to reach groups.
- Protection and enhancement of the built heritage and natural environment, in line with the WCS.
- Protection of open space, public rights of way and recreation facilities through the site selection process and within policy. There are requirements for further open space provision within the draft Plan.
- Buildings that provide access for all.
- Viable communities that are robust and resilient, and able to retain important local services.
- Provision of meaningful transport choices for those who are marginalized due to not having a private motor car.
- To ensure that the elderly have good access to vital services.
- To ensure rural communities are able to retain locally valued services and facilities.
- To ensure that larger scale development in Wiltshire is complemented by smaller scale and appropriately managed development in rural areas to ensure that benefits are felt across Wiltshire as a whole.
- Ensuring development is of high quality design that creates a strong sense of place.

The draft Plan involves allocating new development sites in Wiltshire, and there will be people who feel disadvantaged by the development that will take place. This is expressed

through representations in response to public consultations which object to new development. The strategy has been devised to address such concerns where possible, and represents a proportionate response to the need to deliver the housing requirement for Wiltshire while protecting the quality of life of existing residents. Furthermore, potential environmental impacts will be mitigated through careful master planning.

Development could lead to pressure on existing services in smaller rural settlements, and could have an impact on access to services in more rural locations. One of the challenges will be retaining existing and valued services in the smaller settlements, and the WCS, which the draft Plan sits with, includes protective policies which seek to aid the retention of local services in Core Policies 48 and 49.

The ongoing continuous improvement of the service in producing all planning policies and future documents will be supported by the following measures:

- Ensure an in depth understanding of the diversity of the community and discuss with experts from a national and local level on how best to engage hard to reach groups.
- Target easy to understand and participatory activity sessions, such as 'planning for real' more widely and at specific groups.
- Ensure lead-in and frontloading is designed into the process, to give the time to identify and set up positive dialogue and partnerships with under-represented groups.
- Training of communication skills best suited to each audience.
- Ensuring that time, costs and resources are properly planned for and that consultation is not reduced to a 'tick-box' exercise.

It is important to seek balanced views and where there is conflict a forum which promotes debate between parties with differing views is extremely beneficial in seeking compromise.

***Section 5 – How will the outcomes from this equality analysis be monitored, reviewed and communicated?**

Prompts:

- Do you need to design performance measures that identify the impact (outcomes) of your policy/strategy/change of service on different protected characteristic groups?
- What stakeholder groups and arrangements for monitoring do you have in place? Is equality a standing agenda item at meetings?
- Who will be the lead officer responsible for ensuring actions that have been identified are monitored and reviewed?
- How will you publish and communicate the outcomes from this equality analysis?

How will you integrate the outcomes from this equality analysis in any relevant Strategies/Policies?

This assessment will sit alongside other key documents such as the Sustainability Appraisal and Assessment under the Habitats Regulations and form part of a toolbox that has informed the development of the draft Plan. The outcomes of the draft Plan will be reviewed and monitored through the Authority's Monitoring Report (formerly the Annual Monitoring Report).

It will be ensured that changes in law, guidance and best practice are identified and incorporated wherever relevant.

This Equality Impact Assessment forms an important supporting document to the draft Plan.

It will be published and be available as part of a suite of documents supporting the submission draft Plan.		
<p>The draft Plan aims to positively manage growth in accordance with the Wiltshire Core Strategy and seeks to ensure sufficient homes are available to meet housing needs. The public consultations have been designed to help ensure that everyone has the opportunity to comment on the draft Plan.</p> <p>When the draft Plan is submitted to the Secretary of State for examination, it will be accompanied by this Equalities Impact Assessment undertaken as part of a process to help the Council ensure that it discharges its duties under section 1 and section 149 under the Equality Act 2010 to have due regard to the need to: eliminate discrimination; advance equality of opportunity between persons who share a “relevant protected characteristic” and persons who do not share it; foster good relations between persons who share a “relevant protected characteristic” and persons who do not share it.</p>		
Completed by:	Dave Milton	
Date	20.9.16	
Signed off by	Georgina Clampitt-Dix	
Reviewed by: (to support the pre-submission draft Plan)	Jane Wilkie	
Date	27.6.17	
Reviewed by: (to support the submission draft Plan)	Jane Wilkie	
Date	30.4.18	
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Equality Impact Issues and Action Table (for more information on protected characteristics, see definitions at the end of this document)					
Identified issue drawn from your conclusions (only use those characteristics that are relevant)	Actions needed – can you mitigate the impacts? If you can how will you mitigate the impacts?	Who is responsible for the actions?	When will the action be completed?	How will it be monitored?	What is the expected outcome from the action?
Age					
<p>Sites identified in the draft Plan will deliver sustainable communities that will be delivered in line with the adopted policies of the WCS, which have been designed to safeguard all sectors of the community.</p> <p>The draft Plan provides for policies which will provide equal opportunities for all, including younger people.</p> <p>New education provision is planned to support the additional demand that growth in housing numbers will bring.</p> <p>Groups representing</p>	<p>WCS Core Policy 46 sets out the strategy for meeting the needs of Wiltshire's vulnerable and older people.</p>	<p>Partnership working between Wiltshire Council, developers and local communities.</p>	<p>Up to 2026</p>	<p>Authority's Monitoring Report</p>	<p>Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).⁶</p>

⁶ <http://www.wiltshire.gov.uk/housing-local-housing-needs>

<p>young people have been targeted through the consultation including:</p> <ul style="list-style-type: none"> • Young Persons Council • Youth Action (Wilts) Youth Development Centres 					
Disability					
<p>Strategic sites identified in the draft Plan will deliver sustainable communities that will be delivered in line with the adopted policies of the WCS, which have been designed to safeguard all sectors of the community.</p> <p>Disabled groups have been targeted through the consultation including:</p> <ul style="list-style-type: none"> • Transport for the Disabled and Pensioner's Voice • The Multiple Sclerosis Society • Royal National Institute of Blind people • Diabetes UK Wiltshire 	<p>The new development proposed by the draft Plan will be required to meet the relevant nationally set access standards (part M of the Building Regulations) and will not result in discrimination of people with disabilities.</p>	<p>Partnership working between Wiltshire Council, developers and local communities.</p>	<p>Up to 2026</p>	<p>Authority's Monitoring Report</p>	<p>Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).</p>

Gender Reassignment					
The draft Plan provides for policies which will provide equal opportunities for all, regardless of gender.	Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).
Marriage and Civil Partnership					
The draft Plan provides for policies which will provide equal opportunities for all, regardless of marital status.	Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).
Pregnancy and Maternity					
The draft Plan provides for policies which will provide equal opportunities for all, regardless of this issue.	Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).
Race (including ethnicity or national origin, colour, nationality and Gypsies and Travellers)					
The draft Plan provides for policies which will	WCS Core Policy 47 deals with providing for	Spatial Planning	2016	Authority's Monitoring Report	Providing adequate pitches and facilities for

<p>provide equal opportunities for all, regardless of race.</p> <p>Ethnic groups have been targeted through the consultation including:</p> <ul style="list-style-type: none"> • Friends Families and Travellers • The Showmans Guild of Great Britain • Turkish Community Union • Friends of Romania's Horses • The Romany Gypsy Council • Gypsy Council • Racial Equality Council 	<p>Gypsies and Travellers. A Gypsy and Traveller Development Plan Document is also under preparation. The draft Plan will complement the policies of both documents.</p>				<p>the Gypsy and Traveller needs within Wiltshire.</p>
<p>Religion and Belief</p>					
<p>The draft Plan provides for policies which will provide equal opportunities for all, regardless of religion.</p> <p>Faith groups have been engaged throughout the consultation process. The Plan does not propose any form of development that would obstruct faith groups functioning as normal.</p>	<p>Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.</p>	<p>Partnership working between Wiltshire Council, developers and local communities.</p>	<p>Up to 2026</p>	<p>Authority's Monitoring Report</p>	<p>Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).</p>

Religious groups have been targeted through the consultation including: <ul style="list-style-type: none"> Sikh Missionary Society Dauntsey Church. 					
Sex					
The draft Plan provides for policies which will provide equal opportunities for all, regardless of sex.	Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).
Sexual Orientation					
The draft Plan provides for policies which will provide equal opportunities for all, regardless of sexual orientation.	Implementation of the draft Plan to provide the homes necessary to meet future needs of Wiltshire.	Partnership working between Wiltshire Council, developers and local communities.	Up to 2026	Authority's Monitoring Report	Delivering the homes necessary, including affordable and lifetime homes to meet objectively assessed housing needs as assessed in the Strategic Housing Market assessment (SHMA).

Calculating the Equalities Risk Score

You will need to calculate a risk score twice:

1. On the inherent risk of the proposal itself (without taking into account any mitigating actions you may identify at the end of the Equality Analysis (EA) process)
2. On the risk that remains (the residual risk) after mitigating actions have been identified

This is necessary at both points to:

- Firstly, identify whether an EA needs to be completed for the proposal and;
- Secondly, to understand what risk would be left if the actions identified to mitigate against any adverse impact are implemented

Stage 1 - to get the inherent risk rating:

1. Use the [Equalities Risk Criteria Table](#) below and score each criteria on a scale of 1 - 4 for the impact and their likelihood of occurrence. Multiply these 2 scores together (Likelihood x Impact) to get an overall score (this will range from 1 – 16)
2. Consider the scores and if any one aspect scores a 4 then this is likely to outweigh all others. On this basis determine the appropriate score for the risk. (Do not average scores since this will almost always produce a low – average scored risk)
3. Assess whether you need to carry out an EA using the guidance box below (stage 2)
4. If an EA is needed (i.e. your score is above 3) make a note of your inherent score using the red, amber, green colour rating on the [first page](#) of the EA template

Stage 2 - to identify whether an EA needs to be carried out:

If your inherent risk score is:

12 – 16 or Red = High Risk. **An Equality Analysis must be completed.** Significant risks which have to be actively managed; reduce the likelihood and/or impact through control measures.

6 – 9 or Amber = Medium Risk. **An Equality Analysis must be completed.** Manageable risks, controls to be put in place; managers should consider the cost of implementing controls against the benefit in the reduction of risk exposure.

3 – 4 or Green = Low Risk. **An Equality Analysis must be completed**

1 – 2 or Green = Low Risk. **An Equality Analysis does not have to be completed**

Stage 3 - to get the residual risk rating:

1. Repeat the process above when mitigating actions have been identified and evidenced in the [table](#) on page 3 to calculate the **residual risk**
2. Make a note of the residual risk score using the red, amber, green colour rating on the [first page](#) of the EA template

Equalities Risk Criteria Table

Impact Criteria	Low 1	Moderate 2	Substantial 3	Critical 4
Legal challenge to the Authority under the Public Sector Equality Duty	Complaint/initial challenge may easily be resolved	Internal investigation following a number of complaints or challenges	Ombudsman complaint following unresolved complaints or challenges	Risk of high level challenge resulting in Judicial Review
Financial costs/implications	Little or no additional financial implication as a result of this decision or proposal	Medium level implication with internal legal costs and internal resources	High financial impact - External legal advice and internal resources	Severe financial impact - legal costs and internal resources
People impacts	No or Low or level of impact on isolation, quality of life, achievement, access to services. Unlikely to result in harm or injury. Mitigating actions are sufficient	Significant quality of life issues i.e. Achievement, access to services. Minor to significant levels of harm, injury, mistreatment or abuse OR, low level of impact that is possible or likely to occur with over 500 people potentially affected	Serious Quality of Life issues i.e. Where isolation increases or vulnerability is greatly affected as a result. Injury and/or serious mistreatment or abuse of an individual for whom the Council has a responsibility OR, a medium level of impact that is likely to occur with over 500 people potentially affected	Death of an individual for whom the Council has a responsibility or serious mistreatment or abuse resulting in criminal charges OR High level of impact that is likely to occur, with potentially over 500 people potentially affected
Reputational damage	Little or no impact outside of the Council	Some negative local media reporting	Significant to high levels of negative front page reports/editorial comment in	National attention and media coverage

Equalities Risk Matrix

		Acceptable		Actively managed	
Impact	Critical (4)	4	8	12 Significant Risk	16 Significant Risk
	Substantial (3)	3	6	9	12 Significant Risk
	Moderate (2)	2	4	6	8
	Low (1)	1	2	3	4
		Very Unlikely (1)	Unlikely (2)	Likely (3)	Very Likely (4)
		Likelihood of occurrence			

The protected characteristics:

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds). This includes all ages, including children and young people and older people.

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender reassignment - The process of transitioning from one gender to another.

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Marriage and civil partnership - Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships' and get married (from 29th March 2014) at certain religious venues. Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and maternity - Pregnancy is the condition of being pregnant. Maternity refers to the period of 26 weeks after the birth, which reflects the period of a woman's ordinary maternity leave entitlement in the employment context.

Sex (this was previously called 'gender') - A man or a woman.

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

You are also protected if you are discriminated against because you are **perceived** to have, or are **associated** with someone who has, a protected characteristic. For example, the Equality Act will protect people who are caring for a disabled child or relative. They will be protected by virtue of their association to that person (e.g. if the Carer is refused a service because of the person they are caring for, this would amount to discrimination by association and they would be protected under the Equality Act)

This document was published by the Spatial Planning team, Wiltshire Council, Economic Development and Planning Services.

For further information please visit the following website:

<http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan.htm>

Information about Wiltshire Council services can be made available in other formats (such as large print or audio) and languages on request. Please contact the council on 0300 456 0100, by textphone on (01225) 712500 or by email on customerservices@wiltshire.gov.uk.

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Wiltshire Housing Site Allocations Plan

Sustainability Appraisal Report

Non-Technical Summary

Atkins and Wiltshire Council

May 2018

Notice

This document and its contents have been prepared and are intended solely for Wiltshire Council's information and use in relation to the Wiltshire Housing Site Allocations Plan.

Atkins assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its contents.

Document history

Job number: 5139589						
Revision	Purpose description	Originated	Checked	Reviewed	Authorised	Date
0.10	Non technical summary	BN / CW	KP	KP	KP	15/05/17
0.20	Final Non technical summary	BN / CW	KP	KP	KP	28/05/17
0.30	Non technical summary	BN / CW	KP	KP	KP	27/06/17
0.40	Final following pre-submission consultation	KP	KP	CW	MH	04/05/18

Client signoff

Client	Wiltshire Council
Project	Wiltshire Housing Site Allocations Plan
Document title	SA Report
Job no.	5139589

Non-Technical Summary

Purpose of this report

This report is the Sustainability Appraisal (SA) Report of the Wiltshire Housing Site Allocations Plan (the Plan). The purpose of this SA Report is to assess and inform the development of the Housing Site Allocations Plan. The report has been produced jointly by WS Atkins Limited (Atkins) and Wiltshire Council.

This section is the non-technical summary of the SA Report, setting out the SA process for the Plan and summarising the key assessment findings and recommendations. Wiltshire Council is preparing the Plan to support the delivery of new housing set out in the Wiltshire Core Strategy (adopted January 2015). The Plan will identify sufficient land (in the form of sites) across Wiltshire to ensure delivery of the Wiltshire Core Strategy housing requirement and maintain a five year housing land supply up to the end of the plan period to 2026. It will also review settlement boundaries across Wiltshire.

This SA Report will be published for submission to the Secretary of State alongside the Final Housing Site Allocations Plan. It has been updated following pre-submission consultation on the draft Plan and associated SA Report between 14 July 2017 and 22 September 2017.

Wiltshire Housing Site Allocations Plan – Purpose and Objectives

Purpose

The purpose of the Plan is twofold:

- revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and
- allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026.

Objectives

The Plan has three objectives:

Settlement boundary review

- Objective 1: To ensure there is a clear definition to the extent of the built up areas at principal settlements, market towns, local service centres and large villages

Housing site allocations

- Objective 2: To help demonstrate a rolling five year supply of deliverable land for housing development - a duty on each Local Planning Authority required by the National Planning Policy Framework
- Objective 3: To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy. The spatial strategy for Wiltshire contained in the Core Strategy promotes the sustainable development of the County

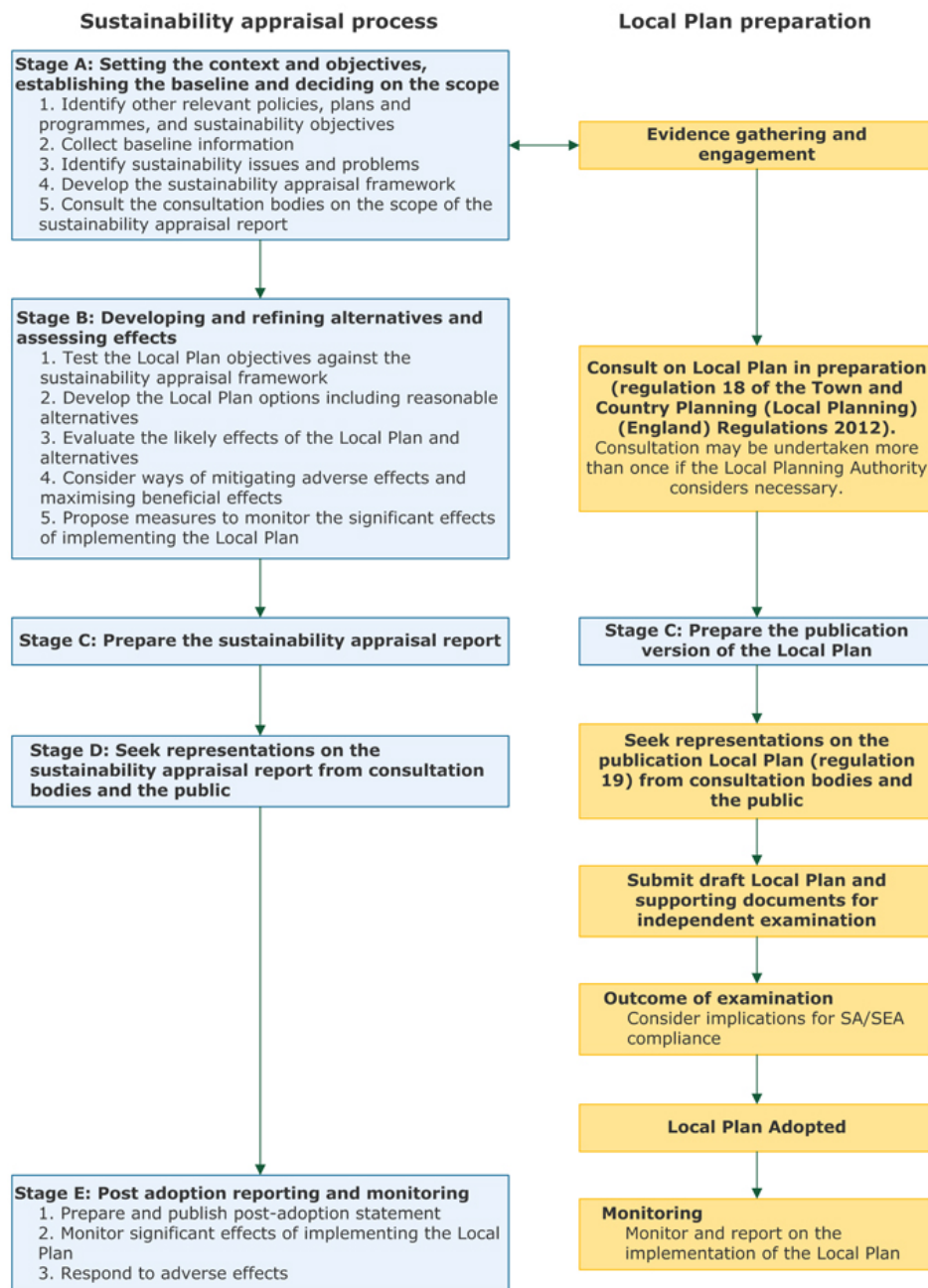
Sustainability Appraisal

SA is required during the preparation of a Local Plan. SA promotes sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

This SA Report has been produced in line with national guidance and legislation. It is also in line with the SA Scoping Report which was published for stakeholder consultation in the middle of 2014 which set out how the SA would be undertaken.

The main stages in the SA process are shown below and involve:

- Stage A – Setting the context and objectives, establishing the baseline and deciding on scope;
- Stage B – Developing and refining options and assessing effects;
- Stage C – Preparing the Sustainability Appraisal Report;
- Stage D – Consultation on the Plan and the Sustainability Appraisal Report; and
- Stage E – Monitoring the significant effects of implementing the plan.



This SA Report document forms part of SA Stage C.

Habitats Regulations Assessment

Alongside the SA process it is also necessary to assess whether the sites contained in the Plan are likely to have a significant effect upon Natura 2000 sites. These comprise designated and candidate Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, which are designated as European sites for their ecological value.

The HRA prepared by Wiltshire Council comprised an early HRA Settlement Level Screening Assessment for the Wiltshire housing sites during the initial development of the Plan. This was used to inform the assessment of the individual site options in Chapter 7 of this report.

A Screening Assessment and Appropriate Assessment of the Plan policies was also undertaken as part of the HRA, which has been used to update the findings of the screening exercise and to inform the assessment of the Plan policies in Chapter 8 of this report.

In conclusion, the HRA identified no adverse effects on the integrity of Natura 2000 sites as a result of the Plan, either alone or in combination with other plans and projects, assuming that the mitigation proposed in the HRA is implemented.

Following pre-submission consultation, an Addendum to the HRA was prepared and additional recommendations made in relation to Bath and Bradford on Avon Bats SAC and the River Avon Special Area of Conservation, and this has been taken into account in this updated SA Report.

Key sustainability issues

The SA process involves setting the context and objectives, establishing the baseline and deciding on the scope of issues to assess. This was done by reviewing various relevant plans and programmes and gathering baseline information on current and likely trends.

From this analysis, the key sustainability issues identified for Wiltshire are briefly summarised below:

Biodiversity

There are numerous Natura 2000 sites in Wiltshire. Development has the potential to affect a number of these sites through habitat disturbance, recreational pressure, water abstraction and pollution. There are also approximately 1,550 County Wildlife Sites (CWSs) in Wiltshire covering approximately 21,000ha of semi-natural habitats. The CWS network does not receive any statutory protection and is vulnerable as a result.

Development has the potential to result in long and short term disturbance of the natural environment resulting in a range of effects on species and habitats (both direct and indirect), which, particularly when taken in combination can be significant.

Across Wiltshire there are opportunities to restore major areas of broadleaved woodland, neutral grassland, limestone grassland, chalk downland, river networks and wetland habitats linking to features shown on the South West Nature Map.

Land and Soil Resources

Due to the county's predominantly rural nature, there is low availability of brownfield land meaning development on greenfield sites is necessary. Nevertheless, the economic and other benefits of the best and most versatile agricultural land should be recognised and priority for development should be given to poorer quality land. Future development needs to provide the opportunity to remediate and redevelop Wiltshire's remaining brownfield sites, particularly in town centres.

Water Resources and Flood Risk

Several key locations within the administrative area of Wiltshire Council have been identified as the focus of a Strategic Water Management Plan – Chippenham, Trowbridge and Salisbury. Historically, the majority of reported flooding issues within Trowbridge have been linked with fluvial flooding from the River Biss. Surface water flooding incidents have been limited, with no significant issues identified.

Historically, the majority of reported flooding issues within Salisbury and the surrounding area have been linked with fluvial flooding from the River Avon (Hampshire), River Nadder and River Bourne. However, due to the nature of the underlying bedrock, base flows within these rivers are inherently linked with groundwater levels. During wet periods, surface water infiltration into the underlying aquifer causes groundwater levels to rise causing increases in base flow within river channels. These cause longer duration flood events that are a combination of groundwater and fluvial flows.

The River Avon SAC and ground water sources are particularly vulnerable to the effects of diffuse and point source pollution, in particular to elevated phosphate levels from additional sewage discharges in the catchment. This can be addressed through the introduction of a Nutrient Management Plan (NMP) to reduce phosphate levels.

Nitrogen enrichment of surface waters and groundwater is already regarded as problem in a number of areas. Wiltshire's chalk streams are internationally important for biodiversity, but currently suffer from a number of interacting factors that are having negative impacts.

Groundwater resources need to be protected and managed to ensure sustainable future supplies. There are two key risks to groundwater: pollution / contamination; and over use of groundwater.

Air Quality and Environmental Pollution

Wiltshire Council has declared a number of AQMAs due to exceedances in nitrogen dioxide. Future development has the potential to result in air quality impacts on biodiversity. Development may also affect noise, vibration and light pollution levels.

Climatic Factors

Wiltshire's ecological footprint is significantly greater than the average global ecological footprint. Efforts directed at climate change adaptation and mitigation at the local level such as reducing the use of non-renewable energy and reducing vehicle journeys, will contribute to reducing the county's ecological footprint. In Wiltshire, there is a local need to reduce carbon emissions and deliver an increased level of renewable energy.

Heritage

Within wider Wiltshire district there is a rich and historic landscape which forms part of Wiltshire's rich natural heritage.

Wiltshire has nearly 20,000 archaeological sites ranging from the prehistoric through to Roman and medieval times and the civil war battlefield at Roundway Down. There are also approximately 12,000 listed buildings, 37 historic parks and gardens and more than 200 conservation areas. There is a need to retain/ preserve and where possible enhance designated and non designated heritage assets. Wiltshire's rural settlements and villages include many historic farm buildings.

Opportunities exist to promote the wider contribution of the historic environment to sustainable development.

Landscape

Wiltshire has high quality and valued landscapes. There are 3 AONBs in Wiltshire: Management plans have been prepared for the three AONBs and will need to be considered in proposals for future development.

With regards to Wiltshire Council's Landscape Character Assessment (LCA) and Special Landscape Areas (SLA) there may be an opportunity to identify those truly unique areas of Wiltshire and protect them for the future, while also avoiding unnecessarily rigid local designations which restrict opportunities for sustainable development. Through new development there are opportunities as well as a need to promote sustainable design in Wiltshire that respects and complements the character of the local landscape.

Part of the Western Wiltshire Green Belt falls in Wiltshire including land surrounding Bradford on Avon, Trowbridge and west of Corsham. The particular objectives of the Western Wiltshire Green Belt are to maintain the open character of undeveloped land adjacent to Bath, Trowbridge and Bradford on Avon, to limit the spread of development along the A4 between Batheaston and Corsham and to protect the historic character and setting of Bradford on Avon.

Population and Housing

Wiltshire faces a number of challenges including an ageing population, issues in respect to provision of Gypsy and Traveller accommodation and lack of affordable housing.

Efficient use of land in Wiltshire is very important, particularly given the rural nature of the county with low levels of previously developed land. It is essential that design solutions are encouraged which will achieve higher density levels wherever possible. There is the opportunity through new development to significantly increase the affordable housing stock.

Healthy and Inclusive Communities

Wiltshire is not a deprived county however there are three small areas - two in Trowbridge and one in Salisbury - which are in the top 20% of deprived areas nationally; they are home to slightly more than 5,000 people. There are also scattered areas of poverty in rural Wiltshire. The most prevalent form of deprivation in Wiltshire relates to barriers to housing and services.

There are a number of challenges faced by rural areas in Wiltshire. These include lack of affordable housing, an ageing population, rural isolation, and lesser accessibility as well as a decline in basic facilities.

New development should be designed to enhance a sense of community through the provision of public/community spaces and facilities, with the provision of appropriate levels of good quality affordable housing to meet local need. Development should also be located within easy access of local services so that these can be accessed on foot, by bike or using public transport.

Education and Skills

Wiltshire has a higher than average proportion of young people not in Employment, Education or Training (NEET). Data suggests that many jobs taken by 16-18 year olds are often temporary; either genuinely short contract or seasonal jobs or the young people move between jobs until they settle.

With regards to workplace skills, Wiltshire has been dominated by low value, low skilled manufacturing and service sectors, resulting in the county becoming an attractive place for the higher skilled and higher paid in which to live, but not to work.

The skills base of Wiltshire is relatively polarised with a high proportion of residents with high skills levels, but equally a significant proportion with poor basic skills and, as a result of the recession, increasing unemployment levels.

Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work. An appropriate level of high quality educational facilities in accessible locations to meet the needs of the community is also required.

Transport

High car ownership is reflective of the rural nature of the county although there are clear geographic differences in the distribution of households without access to cars. The future growth of Wiltshire's largest towns should focus on creating more favourable conditions for people to be less reliant on the car.

There is a need to ensure that employment, education, health, shops, and other essential facilities are accessible to all, and not just those with access to a private car.

There are opportunities to increase the proportion of journeys made on foot as well as increasing the percentage of people cycling to work. Wiltshire's relative affluence and high levels of cycle ownership offer a good opportunity to increase levels of cycling. There is scope for improving walking and cycling facilities in town centres.

Economy and Enterprise

There are discrepancies between average earnings by workplace and average earnings by residence in Wiltshire suggesting that Wiltshire's higher skilled resident workers are unable to secure the higher than average earnings within Wiltshire and therefore commute outside of the county for work.

Housing development should be located in proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport.

Chippenham, Salisbury and Trowbridge should be the focus of both housing and employment development in the future.

The Sustainability Appraisal Framework

The SA Framework is a key component in undertaking the SA by creating a systematic and easily understood tool that allows the prediction and assessment of effects considered likely to arise from the implementation of the Plan.

The SA objectives are as follows:

1. Protect and enhance all biodiversity and geological features and avoid irreversible losses
2. Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings.
3. Use and manage water resources in a sustainable manner.
4. Improve air quality throughout Wiltshire and minimise all sources of environmental pollution
- 5a. Minimise our impacts on climate change – through reducing greenhouse gas emissions.
- 5b. Minimise our impacts on climate change – through reducing our vulnerability to future climate change effects.
6. Protect, maintain and enhance the historic environment
7. Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place
8. Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
9. Reduce poverty and deprivation and promote more inclusive and self-contained communities.
10. Reduce the need to travel and promote more sustainable transport choices.

11. Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth
12. Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce.

Assessment of effects

The Plan has been subject to the SA to predict and evaluate the nature and scale of sustainability effects. The sites and related policies were assessed in two main stages:

- Assessment of a range of reasonable alternative sites using the SA Framework; and
- Assessment of policies for allocation of sites, building on the existing sites assessments, using an assessment rationale derived from the SA Framework of objectives.

An SA assessment scale was used for both assessments, as shown below; further details are provided in Chapter 2.

Generic Assessment Scale

Major adverse effect (- - -)	Option likely to have a major adverse effect on the objective with no satisfactory mitigation possible. Option may be inappropriate for housing development.
Moderate adverse effect (- -)	Option likely to have a moderate adverse effect on the objective. Mitigation likely to be difficult or problematic.
Minor adverse effect (-)	Option likely to have a minor adverse effect on the objective. Mitigation measures are readily achievable.
Neutral or no effect (0)	On balance option likely to have a neutral effect on the objective or no effect on the objective.
Minor positive effect (+)	Option likely to have a minor positive effect on the objective as enhancement of existing conditions may result.
Moderate positive effect (+ +)	Option likely to have a moderate positive effect on the objective as it would help resolve an existing issue.
Major positive effect (+ + +)	Option likely to have a major positive effect on the objective as it would help maximise opportunities.

Assessment of sites

Reasonable alternative site options for assessment in the SA were identified by the Council using the Housing Site Selection Process Methodology. Potential housing sites in areas of search which did not progress to the stage of SA have not been considered as ‘reasonable alternatives’. The Council’s Topic Paper 2 ‘Site Selection Process Methodology’ which accompanies the Plan, explains why housing site allocations in these areas have not been sought.

Reasonable alternatives that were identified through this process were, however, then subject to SA. These reasonable alternative site options were assessed against this scoring system, the results of which were used to identify whether a site was ‘more sustainable’, ‘less sustainable’, or not to be considered further, in order to inform the sites to be taken forward by Wiltshire Council to Stage 4 (the selection of preferred sites stage).

Following pre-submission consultation, a number of additional sites were identified that required SA; and these have been incorporated into Chapter 7 of the SA Report.

In terms of identification of ‘more sustainable’ site options, prediction of minor adverse effects indicate that mitigation is possible and resulting effects are likely be minor (not significant) and thus not a cause of concern. The same is true for site options with neutral or no effects. Thus site options exhibiting the most number of this type of effect across SA objectives were considered ‘more sustainable’.

Moderate adverse effects, on the other hand, indicate that mitigation is problematic, potentially resulting in the occurrence of undesirable significant adverse effects. On this basis, the least number of moderate adverse effects a site option presents, the more preferred it becomes from a sustainability perspective as the risks involved are less.

As a general rule of thumb, site options with five or more moderate adverse effects result in a site being considered ‘less sustainable’; and site options with four or less moderate adverse effects are considered ‘more sustainable’.

It should be noted that less sustainable sites might nonetheless be taken forward by the Council to Stage 4 if more sustainable options have become undeliverable for various reasons, or where a site presents significant beneficial effects, or if there are other reasons for considering these sites beyond the criteria of the SA.

Major adverse effects indicate that mitigation of effects is not considered possible for a particular site option, and therefore that site should not be considered further.

The following sites were assessed in the SA as either ‘more sustainable’, ‘less sustainable’, or not to be considered further; **additional sites that have been considered and any changes to existing sites are identified in BOLD and strikethrough**:

Area of search	Site	SA assessment conclusion
Amesbury Community Area Remainder		
Shrewton	S146 Land to the west of Tanner’s Lane and south of the Hollow, Shrewton	Not to be considered further
	S150 Land north of the A360, Shrewton	Not to be considered further
	S151 Land South of Nettley Farm, Shrewton	Not to be considered further
	S152 Land at Rollestone Manor Farm, Shrewton	Not to be considered further
	S154 Land to the south of London Road, Shrewton	Not to be considered further
	S1067 Land off Maddington Street, Shrewton	Not to be considered further
The Winterbournes	S90 Land between Winterbourne Earls Village School and the Railway Line, The Winterbournes	Not to be considered further
	S91 Land by Summerlug Estate and Railway, The Winterbournes	Not to be considered further
	S92 Land by Railway Line and Vicarage, The Winterbournes	Not to be considered further
	3528 Land adjacent and including Winterbourne Motors, The Winterbournes	Not to be considered further
Amesbury (including Bulford and Durrington)		
Durrington	S98 Land to Rear of Durrington Manor, Durrington	Less sustainable
	3154 Piece Meadow, Durrington	More sustainable
	3179 Land to the south of Larkhill Road, Durrington	More sustainable
Amesbury	3379 Land north of London Road, Amesbury	Less sustainable

Area of search	Site	SA assessment conclusion
Chippenham Community Area Remainder		
Hullavington	689 Land directly behind Gardeners Drive	More sustainable
	690 The Street – Hullavington	More sustainable
	1112 Land to rear of Newton	More sustainable
	3162 Rear of Darley House, The Street	More sustainable
	3377 Land at Green Lane	More sustainable
	<u>3129 The Street, Hullavington</u>	<u>More sustainable</u>
	<u>OM011 Land at Hullavington airfield, Hullavington</u>	<u>Less sustainable</u>
Kington St Michael	797 Manor Farm	Not to be considered further
Yatton Keynell	474b Land adjacent to The Old Forge, The Street	More sustainable
	482 Land East of Farrells Field	More sustainable
	643 Land at Littlemead Farm	Not to be considered further
	<u>OM015 Land east of Yatton Keynell off B4039, Yatton Keynell</u>	<u>Less sustainable</u>
Devizes Community Area Remainder		
Market Lavington	529 Land at Southcliffe Road	More sustainable
	530 Fiddington Hill	More sustainable
	374 R/O 37 White Street	More sustainable
	3268 Land at the Spring	Not to be considered further <u>More sustainable</u>
	1089 Southcliffe	More sustainable
	2055 Underhill Nursery	More sustainable
	3443 Land to the east of Lavington School	More sustainable
	Malmesbury Community Area Remainder	
Crudwell	3233 Land at Ridgeway Farm	More sustainable
	<u>Site OM014 - Land at Tuners Lane, Crudwell</u>	<u>More sustainable</u>
Oaksey	3128 Land off Wick Road	More sustainable
Salisbury Principal Settlement (including Wilton Town)		
Salisbury	S61 Land at Hilltop Way	More sustainable
	S80 Land to the north of Old Sarum	Less sustainable
	S159 Land to the north of Downton Rd	Less sustainable
	S178 Land to the south of Roman Road, Old Sarum	Not to be considered further
	S1027 North of Netherhampton Rd	More sustainable
	S1028 Land at Netherhampton Rd	More sustainable
	3187 Land at Harnham Business Park	Not to be considered further
	3272 Land at Rowbarrow, Odstock Rd	More sustainable

Area of search	Site	SA assessment conclusion
	3421 Land adjacent to A354, Harnham	Less sustainable
	3554a Land to west of Milford Care Home, Salisbury	Not to be considered further
	<u>Site 3435 – Land off Britford Lane</u>	<u>Less sustainable</u>
	<u>Site OM002 - Land north of A3094</u>	<u>Less sustainable</u>
	<u>Site OM003 - The Yard, Hampton Park</u>	<u>More sustainable</u>
Wilton	S1057 Land rear of Bulbridge Rd	More sustainable
Tidworth and Ludgershall Market Town		
Ludgershall	553 Land at Empress Way	More sustainable
Tisbury Community Area Remainder		
Fovant	3449 Badges View	Not to be considered further
	3450 Land at Pembroke Farm	Not to be considered further
Trowbridge Principal Settlement		
Trowbridge	613 Elm Grove Farm/Land off A363 at White Horse Business Park, Drynham Lane (now incorporates Site: 248)	More sustainable
	261 Land at Lower Biss Farm	Not to be considered further
	262 Land west of Yarnbrook Road (A350)	Not to be considered further
	256 Land south of Green Lane, Trowbridge	Not to be considered further
	292 Land north of Green Lane	Not to be considered further
	297 Elizabeth Way	More sustainable
	263 Elizabeth Way	More sustainable
	293 Land to the east of Elizabeth Way	Less sustainable
	1021 Church Lane	More sustainable
	3260 Upper Studley	More sustainable
	298 Land off A363 at White Horse Business Park	More sustainable
	3565 Land east of the A361 at Southwick Court	Less sustainable
Warminster Community Area Remainder		
Chapmanslade	316 Barbers Farm	More sustainable
	1022 Green Farm Industrial Estate and adjacent land	Not to be considered further
	3203 Land at North West Chapmanslade	More sustainable
Codford	612 Chitterne Road	Not to be considered further
	3397 Bury Farmyard, Green Lane	Not to be considered further
	3491 Mayflower Farm	Not to be considered further
	3506 Manor House Grounds	Not to be considered further
Heytesbury	3486 Heytesbury Park	Not to be considered further
	<u>Site OM004 Land west of Heytesbury, adjacent to Greenlands, Heytesbury</u>	<u>Not to be considered further</u>

Area of search	Site	SA assessment conclusion
Warminster Market Town		
Warminster Market Town	302 Land at Bradley Road	More sustainable
	603 Land east of The Dene	Less sustainable
	793 Westbury Road	Not to be considered further
	1032 Bore Hill Farm	Less sustainable
	3242 Land adjacent to Fanshaw Way	Not to be considered further
	304 Land at Boreham Road	More sustainable
	<u>Site OM005 Land at Brick Hill</u>	<u>Less sustainable</u>
	<u>Site OM006 Land to the south of Boreham Road</u>	<u>Not to be considered further</u>
	<u>Site 1030 – 44 & 45 Bath Road</u>	<u>More sustainable</u>
	<u>Site 239 – Land on Upper Marsh Road</u>	<u>Less sustainable</u>
<u>Site 2091 – Land between Bath Road and A36</u>	<u>Less sustainable</u>	
Westbury Community Area Remainder		
Bratton	321 Land off B3098 adjacent to Court Orchard/Cassways, Bratton	More sustainable
	<u>Site 738 – Land south of Westbury Road, Bratton</u>	<u>More sustainable</u>

Assessment of policies

The Plan pre-submission document proposes three policies relating to the Housing Market Areas of Wiltshire and a number of other policies and site allocations for individual sites as set out in the table below. **As a result of the pre-submission consultation, a few amendments have been made to the number of dwellings; and one further site has been included for allocation; these changes are noted in the table below.**

Sites proposed for housing development within Plan pre-submission document:

Policy	Community Area	Policy/site allocation	Site Name	No. of Dwellings
H1 East Wiltshire Housing Market Area	Tidworth	Policy H1.1	Empress Way, Ludgershall	270
	Deveses	Site allocation H1.2	Underhill Nursery, Market Lavington	50
		Site allocation H1.3	Southcliffe, Market Lavington	15
		Site allocation H1.4	East of Lavington School, Market Lavington	15
H2 North and West Wiltshire Housing Market Area	Trowbridge	Policy H2.1	Elm Grove Farm, Trowbridge	200 250
		Site allocation H2.2	Land off A363 at White Horse Business Park, Trowbridge	150 300
		Site allocation H2.3	Elizabeth Way, Trowbridge	205 355
		Site allocation H2.4	Church Lane, Trowbridge	45
		Site allocation H2.5	Upper Studley, Trowbridge	20 45
		Site allocation H2.6	Southwick Court, Trowbridge	180

Policy	Community Area	Policy/site allocation	Site Name	No. of Dwellings
	Warminster	Policy H2.7	East of the Dene, Warminster	100
		Site allocation H2.8	Bore Hill Farm, Warminster	70
		Site allocation H2.9	Boreham Road, Warminster	30
		Site allocation H2.10	Barters Farm Nurseries, Chapmanslade	35
	Chippenham	Policy H2.11	The Street, Hullavington	50
		Site allocation H2.12	East of Farrells Field, Yatton Keynell	30
	Malmesbury	Site allocation H2.13	Ridgeway Farm, Crudwell	50
	Westbury	Site allocation H2.14	Off B3098 adjacent to Court Orchard / Cassways, Bratton	40 35
H3 South Wiltshire Housing Market Area	Salisbury	Policy H3.1	Netherhampton Road, Salisbury	640
		Site allocation H3.2	Hilltop Way, Salisbury	10
		Site allocation H3.3	North of Netherhampton Road, Salisbury	100
		Site allocation H3.4	Land at Rowbarrow, Salisbury	100
		<u>New site allocation</u>	<u>OM003 The Yard, Hampton Park, Salisbury</u>	<u>14</u>
	Amesbury	Site allocation H3.5	Clover Lane, Durrington (comprising sites S98 and 3154)	30 45
		Site allocation H3.6	Larkhill Road, Durrington	15

The three Housing Market Area policy options were reviewed taking into account the combination of the site allocations, individual sites making up the Policy and the mitigation measures proposed in the Plan for that Policy. Each Housing Market Area Policy was then assessed using the generic assessment scale identified above. A summary table of the overall sustainability effects of the three Housing Market Area policies is presented below. The assessment takes into account the mitigation measures proposed within the Plan, which to a large part covers the issues identified in the SA of the individual sites; as such, the overall score of the Policies against certain SA Objectives may be more positive than the sum of individual site assessment scores, as appropriate mitigation has been proposed within the Policy. **It also presents updates taking into account the proposed Plan modifications and where these strengthen the Plan in relation to the SA Objectives.**

For some SA Objectives, both positive and negative effects have been identified for the Housing Market Area Policy; this reflects that either sufficient mitigation has been included in the policy or site allocation within the Policy, but for others further mitigation is recommended; and/or that both positive and negative effects can be anticipated as a result of the Policy e.g. adverse effects on biodiversity due to the loss of existing habitats, however the potential for longer term benefits through improved planting and landscaping on site leading to biodiversity gain.

The specific details for each score are presented in the SA Report at Table 8.5.

Summary effects of Housing Market Area policies

SA Objective		Policy H1	Policy H2	Policy H3
1	Protect and enhance all biodiversity and geological features and avoid irreversible losses	++ / -	++ / -	++ / -
2	Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings	+ / -	+ / -	+ / -
3	Use and manage water resources in a sustainable manner	++ / -	++ / -	++ / -
4	Improve air quality throughout Wiltshire and minimise all sources of environmental pollution	+ / -	+ / -	+ / -
5a	Minimise our impacts on climate change – through reducing greenhouse gas emissions	++ / -	++ / -	++ / -
5b	Minimise our impacts on climate change – through reducing our vulnerability to future climate change effects	++ / -	++ / -	++ / -
6	Protect, maintain and enhance the historic environment	-	-	-
7	Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place	+ / -	+ / -	+ / -
8	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures	++	+++	++
9	Reduce poverty and deprivation and promote more inclusive and self-contained communities	+	++ / -	+ / -
10	Reduce the need to travel and promote more sustainable transport choices	+ / -	+ / -	+ / -
11	Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth	+	++	+++
12	Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local business and a changing workforce	+	+	+

The three Housing Market Area policies which relate to specific sites have been assessed both individually, in-combination with one another and cumulatively with other plans. The results are as follows:

Policy H1

Policy H1 allocates land in the East Wiltshire Housing Market Area, in Tidworth and Devizes Community Areas. The policy will deliver 350 dwellings.

Mixed effects (**moderate**/minor positive and minor negative) and minor adverse are predicted in relation to a number of objectives. Negative effects may occur on biodiversity as a result of construction due to the removal for example of hedgerows, however positive effects may occur in the long term as a result of enhancement measures. ~~The HRA has identified no LSE in relation to these sites~~ **Proposed Plan modifications support and strengthen requirements in relation to HRA and protection of Natura 2000 sites** (SA Obj. 1). Development of the proposed sites will result in the inevitable loss of greenfield/ agricultural land (SA Obj. 2). There are potential negative effects on surface water management, however

the policy identifies the need for further assessment of drainage and flood risk assessments **and is further strengthened through proposed Plan modifications** (SA Obj. 3 and 5b).

Minor negative effects are identified in relation to air quality and the policy identifies general mitigation to this effect, though some of the wording could be strengthened. Ultimately, though, the allocation of a number of sites will result in an increase in the number of private car journeys (SA Obj. 4).

Though the proposed policy requires that new development adheres to high quality design and construction standards and that for more substantial sites, a Sustainable Energy Strategy will be required, the development of the sites is likely to result in an inevitable increase in the carbon footprint of Wiltshire (SA Obj. 5a).

Localised effects may occur on cultural heritage and archaeology, although the policy within the cross-cutting themes provides for the requirement of heritage impact assessments where appropriate (SA Obj. 6).

Impacts on the landscape will be inevitable and result in the increased urbanisation of Wiltshire villages and towns, however the policy provides for the requirement for appropriate landscaping, planting and screening (SA Obj. 7).

The policy will promote more inclusive and self-contained communities, however at some sites this could result in increased pressure on local school and health care facility capacity; however, given the overall quantum of development, these issues are addressed directly through the provision of a school as part of the policy or through infrastructure contributions (SA Obj. 9).

The allocation is likely to provide significant social and economic benefits such as providing good quality, affordable housing and varied housing (SA Obj. 8) and contributing positively to the growth of the local economy and to the provision of jobs (SA Objs. 11 and 12).

Policy H2

Policy H2 allocates land in the North and West Wiltshire Housing Market Area, in Trowbridge, Warminster, Chippenham, Malmesbury and Westbury Community Areas. The policy will deliver ~~4205~~ **1575** dwellings.

Mixed effects (**moderate**/minor positive and minor negative) and minor adverse are predicted in relation to a number of objectives. Negative effects may occur on biodiversity as a result of construction due to the removal for example of hedgerows, however positive effects may occur in the long term as a result of enhancement measures. ~~The HRA has identified no LSE in relation to these sites~~ **Proposed Plan modifications support and strengthen requirements in relation to HRA and protection of Natura 2000 sites** (SA Obj. 1). Development of the proposed sites will result in the inevitable loss of greenfield/ agricultural land, with sites identified within this policy as containing best and most versatile land, as well as one site containing a landfill (SA Obj. 2).

There are potential negative effects on surface water management, however the policy identifies the need for further assessment of drainage and flood risk assessments **and is further strengthened through proposed Plan modifications** (SA Obj. 3 and 5b).

Minor negative effects are identified in relation to air quality and the policy identifies general mitigation to this effect, though some of the wording could be strengthened. Ultimately, though the allocation of a number of sites will result in an increase in the number of private car journeys (SA Obj. 4).

Though the proposed policy requires that new development adheres to high quality design and construction standards and that for more substantial sites, a Sustainable Energy Strategy will be required, the development of the sites is likely to result in an inevitable increase in the carbon footprint of Wiltshire (SA Obj. 5a).

Localised effects may occur on cultural heritage and archaeology, although the policy within the cross-cutting themes provides for the requirement of heritage impact assessments where appropriate (SA Obj. 6).

Impacts on the landscape will be inevitable and result in the increased urbanisation of Wiltshire villages and towns, however the policy provides for the requirement for appropriate landscaping, planting and screening (SA Obj. 7).

The policy will promote more inclusive and self-contained communities, however at some sites this could result in increased pressure on local school and health care facility capacity; however, given the overall quantum of development, these issues are addressed directly through the provision of a school as part of the policy or through infrastructure contributions. **Furthermore, the Plan is strengthened in relation to this objective through the proposed modification** (SA Obj. 9).

The allocation is likely to provide social and economic significant benefits such as providing good quality, affordable housing and varied housing (SA Obj. 8) and contributing positively to the growth of the local economy and to the provision of jobs (SA Objs. 11 and 12).

Policy H3

Policy H3 allocates land in the South Wiltshire Housing Market Area, in Salisbury and Amesbury Community Areas. The policy will deliver ~~895~~ **924** dwellings.

Mixed effects (**moderate**/minor positive and minor negative) and minor adverse are predicted in relation to a number of objectives. Negative effects may occur on biodiversity as a result of construction due to the removal for example of hedgerows, however positive effects may occur in the long term as a result of enhancement measures. ~~Whilst the HRA has identified no LSE in relation to these sites on the River Avon SAC, recommendations have been made in the HRA and incorporated into the Policy~~ **Proposed Plan modifications support and strengthen requirements in relation to HRA and protection of Natura 2000 sites** (SA Obj. 1). There are potential negative effects on surface water management, however the policy identifies the need for further assessment of drainage and flood risk assessments **and is further strengthened through proposed Plan modifications** (SA Obj. 3 and 5b).

Development of the proposed sites will result in the inevitable loss of greenfield/ agricultural land (SA Obj. 2). Minor effects are identified in relation to air quality and the policy identifies general mitigation to this effect, though some of the wording could be strengthened. Ultimately, though the allocation of a number of sites will result in an increase in the number of private car journeys (SA Obj. 4).

Though the proposed policy requires that new development adheres to high quality design and construction standards and that for more substantial sites, a Sustainable Energy Strategy will be required, the development of the sites is likely to result in an inevitable increase in the carbon footprint of Wiltshire (SA Obj. 5a).

Localised effects may occur on cultural heritage and archaeology, although the policy within the cross-cutting themes provides for the requirement of heritage impact assessments where appropriate (SA Obj. 6).

Impacts on the landscape will be inevitable and result in the increased urbanisation of Wiltshire villages and towns, however the policy provides for the requirement for appropriate landscaping, planting and screening (SA Obj. 7).

The policy will promote more inclusive and self-contained communities, however at some sites this could result in increased pressure on local school and health care facility capacity; however, given the overall quantum of development, these issues are addressed directly through the provision of a school as part of the policy or through infrastructure contributions (SA Obj. 9).

The allocation is likely to provide social and economic significant benefits such as providing good quality, affordable housing and varied housing (SA Obj. 8) and contributing positively to the growth of the local economy and to the provision of jobs (SA Objs. 11 and 12).

Combined effects

When considering cumulative effects across the three Housing Market Area policies, there are likely to be elevated effects, both beneficial and adverse.

The main significant adverse cumulative effects relate to environmental issues, predominantly as the policies allocate sites on greenfield land. Significant adverse effects also arise from the scale of housing and associated development proposed.

The elevated adverse effects that are likely to arise from the combination of policies H1, H2 and H3 include:

- The total loss of best and most versatile land (SA Obj. 2);
- Effects on air quality, noise and light pollution (SA Obj. 4) – the overall scale of development and provision of new roads is likely to increase air, noise and light significantly for new and existing sensitive receptors.
- ~~Effects on the use and management of water resources in a sustainable manner (SA Obj. 3) – due to existing issues related to surface water management, drainage and flood risk that extend beyond the localised area.~~
- Effects on climate change as a result of greenhouse gas emissions (SA Obj. 5a) – the scale of development is likely to see a significant increase in the number of private car journeys, which may for example affect greenhouse gas emissions.
- ~~Effects on climate change (vulnerability to future climate change effects) (SA Obj. 5b) – similar to SA Obj. 3, whereby existing issues related to surface water management, drainage and flood risk extend beyond the localised area.~~
- Effects on transport and travel (SA Obj. 10) – the scale of development is likely to see a considerable increase in the number of private car journeys.

A number of significant beneficial effects will also arise, related to social and economic considerations. The combination of the policies will result in a substantial contribution to the provision of, and the opportunity to live in, good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures (SA Obj. 8) and contribute significantly to the local economy and enterprise (SA Obj. 11 and 12).

Cumulative effects

Cumulative effects have been considered in terms of the Wiltshire Housing Site Allocations Plan and the Core Strategy strategic sites at Amesbury, Trowbridge, Tidworth and Ludgershall, Warminster and Salisbury, the Chippenham Site Allocations Plan and the Army Basing Programme.

There may be cumulative effects as a result of Policy H1 with land identified for housing development at Drummond Park (MSA) Depot, Ludgershall in the Core Strategy; as a result of Policy H2 with land identified to the south east of the town at Ashton Park, Trowbridge in the Core Strategy; and land identified to the west of Warminster for strategic growth in the Core Strategy; and housing development identified in the Chippenham Site Allocations; and as a result of Policy H3 with strategic sites proposed at Salisbury and Amesbury in the Core Strategy. There may also be cumulative effects at Durrington associated with the Army Basing Programme and Policy H3.

In general, cumulative effects are likely to occur due to the additional scale of development potentially leading to elevated effects, which will generally be beneficial in social and economic terms and adverse in environmental terms within the general area (rather than site specific cumulative effects given the general distribution of the developments in relation to each other). Where environmental adverse effects are likely, these are capable of being mitigated in line with the policies set in the Chippenham Site Allocations Plan and the emerging masterplans for the strategic sites together with the SA recommendations made for the Wiltshire Housing Site Allocations Plan.

In most cases these adverse effects are the same as the combined effects for Policies H1, H2 and H3, however elevated effects may occur in relation to:

- SA Obj. 5a. Minimise our impacts on climate change – through reducing greenhouse gas emissions. The various Plans are likely to see an increase in the amount of development and associated infrastructure such as roads, which is likely to lead to increased greenhouse gas emissions both during construction and operation. Overall, there will be an increase in the carbon footprint.
- SA Obj 7. Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place. Overall, there will be increased urbanisation, in particular at Warminster, Trowbridge and Chippenham. There may also be similar adverse cumulative effects in relation to the Policy H3 in Salisbury with strategic sites in the Core Strategy. Overall, landscaping should help to reduce adverse effects.

- SA Obj 9. Healthy and inclusive communities, SA Obj. 11 Economy and enterprise and SA Obj. 12 Economy and enterprise. Overall the cumulative beneficial effects should be considerable, as the all new developments proposed across the Wiltshire Housing Site Allocations and the Core Strategy Strategic Sites will assist in the support of viable local shops and services as well as generate direct and indirect construction employment, and will help stimulate the local economy once built.

Assessment of settlement boundaries

The Council has developed an updated methodology to review its settlement boundaries as part of the Plan. Settlement boundaries (or ‘limits of development’) define the built form of a settlement by, where practicable, following but not including clearly defined physical features, such as walls, fences, hedgerows, roads and water courses.

This revised methodology (refer to the Council’s Topic Paper 1) consists of six themes, as follows:

- Theme 1 ‘Physical features on the ground’ lists specific land uses and their physical relationship to the existing settlement;
- Theme 2 ‘Different types of Development’ covers specific land uses and their physical relationship to the existing settlement;
- Theme 3 ‘Planning Permissions’ explores which kind of planning permissions should be brought forward within the revised settlement boundary;
- Theme 4 ‘Sites allocated for development in the local plan’ identifies whether planning allocations should be included within the revised settlement boundary of Wiltshire Council;
- Theme 5 ‘The curtilage of properties, including large gardens’ covers the type of back garden to be included within the settlement boundary based on their capacity to extend the built form and their location in regards the existing settlement; and
- Theme 6 ‘Recreational or amenity space at the edge of settlements’ covers whether to include recreational and amenity spaces within the revised settlement boundary of Wiltshire Council based on their size and location.

From an SA perspective, the review of settlement boundaries is welcomed, however it is not the purpose of the SA to decide on the revised settlement boundary methodology as part of the Wiltshire Housing Site Allocations Plan. This is the role of Wiltshire Council who will have to make decisions about what physical elements to include within its revised boundaries.

Mitigation measures

A number of recommendations have been made in order to mitigate adverse effects that have been identified. These are both a mix of improvements to the policies in terms of wording and requirements, and further assessment. Measures are proposed in Chapter 8, and summarised in the table below, together with the Council’s response to the recommendations:

Plan policy	Recommendations	Council Response	Plan amendment
Cross-cutting themes in Chapter 5 of the Plan	As all sites will require ecological assessment, it is recommended that paragraph 5.4 is amended as follows (proposed addition in bold): “An ecological assessment will be required for all sites. The development will protect and improve opportunities for biodiversity and wildlife corridors within and adjoining the site in accordance with Core Policy 50 (Biodiversity and Geodiversity)” .	Plan allocations involve greenfield sites. The suggested text provides useful further clarification.	Add to paragraph 5.4 “An ecological assessment will be required for all sites. The development will...”
	In paragraph 5.7, the policy could be strengthened by requiring that some of the new housing meets the specific needs of vulnerable and older people.	Further material would replicate measures already included in the development plan, in Core Policy 46.	No change

Plan policy	Recommendations	Council Response	Plan amendment
	<p>It is recommended that the following sentence (in bold) is added to paragraph 5.11: <i>“As appropriate, additional evidence will need to be prepared at a level of detail to support a planning application. In many cases, particularly important items are referred to for each allocation. Such evidence may include, but is not limited to a Landscape and Visual Impact Assessment, Heritage Assessment, Biodiversity Report, Surface Water Management plan, Flood Risk Assessment and Transport Statement. This should include a Construction Environmental Management Plan (CEMP) to capture the management measures proposed by individual assessments. Such new evidence can be used as a material consideration when considering a specific planning application.”</i></p>	<p>Further material would replicate measures already provided as standing advice. Measures would be sought as a part of the master planning process and/or conditioned as part of planning permission.</p>	<p>No change</p>
	<p>It is recommended that the following sentence is added in after paragraph 5.11: <i>“Depending on the size of the site and likely impacts, as appropriate, a statutory Environmental Impact Assessment (EIA) may be required”.</i></p>	<p>Additional text replicates measures already included in the planning system. All planning applications are screened for the likelihood of significant environmental effects in accordance with regulations.</p>	<p>No change</p>
	<p>It is recommended that the following requirements are also included:</p> <p><i>“Development will consider opportunities for integrated surface water management and pollution prevention measures such as Sustainable Drainage Systems (SuDS); Surface water management should achieve equivalent or less than current Greenfield rates of run-off so there will be no deterioration of current run-off conditions”.</i></p> <p><i>“Where applicable, development will consider school and healthcare facility capacity and ensure that a sustainable solution is provided”.</i></p> <p><i>“Wherever possible, development will provide for sustainable modes of travel, including safe access for vulnerable road users (pedestrians, cyclists) and incorporate footpaths and cycle lanes”.</i></p> <p><i>“Developments will seek to protect air quality and ensure that noise impact is properly considered during the construction and operational phases.”</i></p> <p><i>“Development will seek to reduce the overall loss of best and most versatile agricultural land wherever possible. The loss of soil resources can be mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an after use appropriate to the soil’s quality).”</i></p>	<p>Further text replicates measures or objectives already included in the development plan or elsewhere:</p> <ul style="list-style-type: none"> • regarding surface water management, in Core Policy 67 • regarding air quality, in Core Policy 55 • regarding sustainable modes of travel in Core Policy 61 <p>Individual Plan allocations identify where additional school or healthcare capacity is necessary to enable development to go ahead.</p> <p>Individual Plan allocations identify where additional measures may be required to protect against noise pollution.</p> <p>Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and Re-use of soil along these lines would be sought as a part of the master planning process and/or conditioned as part of planning permission.</p>	<p>No change</p>
<p>Policy H1 East Wiltshire Housing Market Area</p>			

Plan policy	Recommendations	Council Response	Plan amendment
Individual site policy/site allocation within Policy H1			
Site allocation H1.2 Underhill Nursery, Market Lavington	It is recommended that this site allocation could be strengthened by identifying the need for further cultural heritage assessment given that potential effects on SA Objective 6 are identified as moderate adverse at this site.	Medieval remains have been found on or adjacent to the site and further investigation and appraisal would be required. Reference is already made to the need for assessment so is already included.	No change
	The reference in the Plan to the site being within Groundwater Source Protection Zone 2 should be deleted because the SA states that the site is not within a Groundwater Source Protection Zone.	A portion of the site is subject to this protection.	No change
	It is recommended that the requirement for a noise impact assessment is included within the text of this site allocation.	Neighbouring uses are residential and low key business. Any need for an assessment will be considered through a planning application process.	No change
Site allocation H1.3 Southcliffe, Market Lavington	It is recommended that the requirement for the retention of priority habitat on site, a noise impact assessment and an archaeological assessment be included within the text of site allocation H1.3.	Further text would replicate measures or objectives already included in the development plan or elsewhere: <ul style="list-style-type: none"> regarding biodiversity, in Core Policy 50 regarding heritage assets, in Core Policy 58 Neighbouring uses are residential and low key business. Any need for an assessment will be considered through a planning application process	No change
Site allocation H1.4 East of Lavington School, Market Lavington	It is recommended that the requirement for a noise impact assessment and an archaeological assessment should be included within the text of the site allocation H1.4.	Further text would replicate measures or objectives already included in the development plan or elsewhere: <ul style="list-style-type: none"> regarding biodiversity, in Core Policy 50 regarding heritage assets, in Core Policy 58 Neighbouring uses are residential and low key business. Any need for an assessment will be considered through a planning application process	No change
Policy H2 North and West Wiltshire Housing Market Area			
Policy H2 North and West Wiltshire Housing Market Area	It is recommended that the supporting text for Policy H2 in relation to Trowbridge is amended as follows: Paragraph 5.45: <i>“Despite the need to identify sites for additional housing at the town, there are significant ecological (protected species and</i>	Paragraph 5.45 does not provide an exhaustive list of constraints that affect the town.	No change

Plan policy	Recommendations	Council Response	Plan amendment
	<p><i>potential impacts upon the Bath and Bradford on Avon Bats SAC</i> } (e.g. protected bat species), landscape (Green Belt) and infrastructure (i.e. e.g. education and health facility capacity) constraints that limit the choice of available sites. “</p> <p>The reference to mitigation for landscape and cultural heritage should be added to site allocation H2.4 – see the section on H2.4 below.</p>	Additional text referring to site specific mitigation measures is already included.	
	<p>In addition to the Priority Biodiversity Action Plan habitats, reference should be made at paragraph 5.45 to the HRA recommendations:</p> <p><i>“Habitats Regulations Assessment: Potential impacts upon the Bath and Bradford on Avon Bats SAC through habitat loss and disturbance have been identified in the HRA for sites in Trowbridge, and the HRA identifies mitigation that is required for specific sites. These measures are identified under relevant site allocation supporting text”.</i></p>	<p>Reference is made in paragraph 5.46.</p> <p>The HRA concludes that Plan allocations will not be likely to have significant adverse effects on the integrity of the River Avon SAC.</p>	No change
	<p>Whilst no LSE on the River Avon SAC and phosphate loading has been identified in the HRA, it is recommended that, when available, Annex 2 of the River Avon Special Area of Conservation Nutrient Management Plan for Phosphorus is reviewed for any additional mitigation measures that may be proposed.</p>	Any implications arising from review of the Nutrient Management Plan will be addressed as Plan preparation progresses.	No change
Individual site policy/site allocation within Policy H2			
Policy H2.1 Elm Grove Farm, Trowbridge	It is recommended that the requirement for potential statutory easements, as the existing foul sewerage infrastructure crosses the site, and a Noise Impact Assessment should be included within the text of the Policy H2.1.	<p>The treatment of statutory easements is a common feature of detailed design and layout that will be considered as part of the master plan process.</p> <p>Small parts of the site could potentially be affected by noise from a main road and railway, so additional text would be useful clarification.</p>	<p>Add to paragraph 5.53:</p> <p><i>“...In addition, development will need to minimise the potential to harm the significance of the Grade II Listed Drynham Lane Farmhouse.</i></p> <p><i>Measures may also be necessary to prevent potential noise pollution from the existing main road and railway.”</i></p>
Site allocation H2.2 Land off A363 at White Horse Business Park	Given the original size of development, moderate adverse effects regarding loss of Best and Most Versatile agricultural land were identified in the site assessment in Chapter 7; due to the reduction in the site size this effect has been mitigated to some degree though a moderate adverse effect is still possible. Should the site be developed, the cross-cutting theme in relation to soil retention on site should be applied to the site allocation supporting text: “Development will seek to reduce the overall loss of best and most versatile agricultural land wherever possible. The loss of soil resources can be	Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and re-use of soil along these lines would be sought as a part of the master planning process and/or conditioned as part of planning permission.	No change

Plan policy	Recommendations	Council Response	Plan amendment
	mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an after use appropriate to the soil's quality)."		
	Due to the size of the site, development would potentially lead to increased car-based movements and hence impact on the local highway network, even with the reduction in the number of dwellings proposed. The requirement for a Transport Assessment for this site should be identified in the site allocation.	Further text would replicate measures or objectives already included in the development plan regarding travel in Core Policy 61.	No change
Site allocation H2.3 Elizabeth Way	Approximately three quarters of the land within Site 263 appears to be underlain by Grade 3a Best and Most Versatile agricultural land; the reduction in site capacity will reduce some of the negative effects; however, the site is still of a significant size and therefore all effects cannot be mitigated totally. It is recommended that should the site be developed, the following text is added to this site allocation: <i>"Development will seek to reduce the overall loss of best and most versatile agricultural land wherever possible. The loss of soil resources can be mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an after use appropriate to the soil's quality)."</i>	Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and re-use of soil along these lines would be sought as a part of the master planning process and/or conditioned as part of planning permission.	No change
Site allocation H2.5 Upper Studley	It is recommended that the following text is added to this site allocation: <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town."</i>	The scale of development and its impact is not considered to be of a scale that contributions could be justified as fairly and reasonably related or necessary to enable it to go ahead.	No change
Policy H2.7 East of the Dene, Warminster	It is recommended that the Policy text identifies the need to reduce the loss of best and most versatile agricultural land where possible. It is recommended that should the site be developed, the following text is added to this Policy: <i>"Development will seek to reduce the overall loss of best and most versatile agricultural land wherever possible. The loss of soil resources can be mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an after use appropriate to the soil's quality)."</i>	Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and re-use of soil along these lines would be sought as a part of the master planning process and/or conditioned as part of planning permission.	No change
	It is recommended that the following text is added to this Policy: <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to</i>	The additional text provides useful clarification.	Additional text after paragraph 5.89: <i>"In order to facilitate development, appropriate contributions would</i>

Plan policy	Recommendations	Council Response	Plan amendment
	<i>increase capacity at local GP surgeries and dentistry at the town."</i>		<i>be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town."</i>
Site allocation H2.8 Bore Hill Farm	It is recommended that further consideration is required within the Plan to the extent of development at this site to reduce the impact on BMV.	The benefits of proposals outweigh harm from any loss of BMV. Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and the re-use of soil would be sought as a part of the planning application process and may be conditioned as part of planning permission.	No change
	It is recommended that the following text is added to this site allocation: <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town."</i>	The additional text provides useful clarification.	Additional text after paragraph 5.92: <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town."</i>
	Although only minor adverse effects, to ensure that the full suite of measures identified for this site are covered, it is recommended that the requirement a noise impact assessment is included within the text of site allocation H2.8.	Parts of the site could potentially be affected by noise, so additional text would be useful clarification.	Add to paragraph 5.92: <i>"... located between the operational bio-digester and proposed residential development, to provide separation between these uses. A noise assessment would form part of the planning application process and to inform detailed design and</i>

Plan policy	Recommendations	Council Response	Plan amendment
			<i>layout. Future development..."</i>
Site allocation H2.9 Boreham Road	It is recommended that appropriate mitigation for the landfill / rubble within this site should be identified within the site allocation supporting text.	Soil condition would be considered as a part of the application process and/or conditioned as part of planning permission.	No change
	The moderate adverse effect on education and health facility capacity is not addressed in the supporting text for Warminster or the site allocation. It is recommended that the following text is added to this site allocation. <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town."</i>	The additional text provides useful clarification.	Additional text after paragraph 5.98: <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town."</i>
Site allocation H2.10 Barbers Farm Nurseries, Chapmanslade	It is recommended that the site allocation text specifically identifies the need for detailed ecological assessment at this site.	Further text would replicate measures or objectives already included in the development plan regarding biodiversity, in Core Policy 50.	No change
Policy H2.11 The Street, Hullavington	It is recommended that the Policy text specifically identifies the need for detailed ecological assessment at this site. Furthermore, it is recommended that the requirement for a Heritage Impact Assessment is specifically identified in the Policy text.	Further text would replicate measures or objectives already included in the development plan regarding biodiversity, in Core Policy 50, and Heritage Impact Assessment in Core Policy 58.	No change
Site allocation H2.12 East of Farrells Field, Yatton Keynell	Site allocation H2.12 and its supporting text does not specifically address the moderate adverse effects related to the limited supply capacity in local distribution mains, the potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area. It is recommended that these issues are identified in the site allocation supporting text, and the need for a capacity appraisal and further assessment is required.	Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the planning application process in accordance with Core Policy 3.	No change
	Given the medium potential for archaeology at this site, it is recommended that the requirement for an archaeological assessment is specifically identified in the site allocation text.	Further text would replicate measures or objectives already included in the development plan regarding biodiversity, in Core Policy 58.	No change
	Site allocation H2.13 and its supporting text does not address the moderate adverse effect related to	A hydrological/ hydrogeological risk assessment may be required	No change

Plan policy	Recommendations	Council Response	Plan amendment
Site allocation H2.13 Ridgeway Farm, Crudwell	the fact that the site is within Groundwater Source Protection Zone 1 and potential significant effects on water quality could arise from development. Any discharge into the local watercourses would need to be at a controlled rate, however surface water systems are already at capacity in this location. It is recommended that these issues are identified in the site allocation supporting text, and the need for further assessment is required.	in order to support development proposals. This would form part of detailed design and consideration as part of the planning application process in accordance with Core Policy 67.	
	Given the medium potential for archaeology, it is recommended that the requirement for an archaeological assessment as well as a Heritage Impact Assessment as this site is near Crudwell Conservation Area is specifically identified in the site allocation text.	Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58.	No change
Site allocation H2.14 Court Orchard / Cassways Bratton	Site allocation H2.14 and its supporting text does not address the moderate adverse effect related to the fact that there are water pressure problems associated with the supply of water in Bratton and therefore a long offsite connection to mains water would be needed to provide capacity. Various infrastructure upgrades would be required for foul and surface water connections. It is recommended that these issues are identified in the site allocation supporting text, and the need for a foul flow capacity assessment is identified in the supporting text.	Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the planning application process in accordance with Core Policy 3.	No change
	Given the medium potential for archaeology, it is recommended that the requirement for an archaeological assessment is specifically identified in the site allocation text.	Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58.	No change
Policy H3 South Wiltshire Housing Market Area			
Individual site policy/site allocation within Policy H3			
Policy H3.1 Netherhampton Road, Salisbury	It is recommended that the Policy text identifies the need to reduce the loss of best and most versatile agricultural land where possible. It is recommended that should the site be developed, the following text is added to this Policy: <i>“Development will seek to reduce the overall loss of best and most versatile agricultural land wherever possible. The loss of soil resources can be mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an after use appropriate to the soil’s quality).”</i>	Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and re-use of soil along these lines would be sought as a part of the master planning process and/or conditioned as part of planning permission.	No change
	Given the high potential for archaeology, it is recommended that the requirement for an archaeological assessment and a noise impact assessment are specifically identified in the Policy text.	Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58.	No change

Plan policy	Recommendations	Council Response	Plan amendment
Site allocation H3.2 Hilltop Way	Although only minor adverse effects, to ensure that the full suite of measures identified for this site are covered, it is recommended that the requirement for a noise impact assessment is included within the text of site allocation H3.2.	Any need for an assessment will be considered through a planning application process.	No change
Site allocation H3.3 North of Netherhampton Road	Site allocation H3.3 and its supporting text addresses the moderate adverse effect in relation to flood risk, however does not specifically identify the limited capacity in local sewers; it would need to be confirmed whether any network reinforcement is necessary to maintain satisfactory service levels. It is recommended that this is identified in the site allocation supporting text and the need for further assessment identified.	Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the planning application process in accordance with Core Policy 3.	No change
	Given the medium potential for archaeology, it is recommended that the requirement for an archaeological assessment is specifically identified in the site allocation supporting text.	Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58	No change
Site allocation H3.4 Land at Rowbarrow	Although only minor adverse effects, to ensure that the full suite of measures identified for this site are covered, it is recommended that the requirement a noise impact assessment is included within the text of site allocation H3.4.	Neighbouring uses are generally low key. Any need for an assessment will be considered through a planning application process.	No change
Site allocation H3.5 Clover Lane, Durrington	Site allocation H3.5 and its supporting text addresses the moderate adverse effects in relation to cultural heritage and school and health facility capacity. However, the potential exacerbation of flood risk and difficulty in mitigating due to ground conditions and capacity of drainage is not identified in this site allocation and is not fully covered by the Amesbury, Bulford and Durrington supporting text. It is recommended that additional text should be added to this site allocation to address the requirement for further assessment.	Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the planning application process in accordance with Core Policies 3 and 67.	No change
	It is recommended that the HRA proposed wording is added to site allocation H3.5, or that general wording is added to Policy H3 that identifies that upgrades [by others] may need to be completed before development at this site can commence.	The HRA concludes that Plan allocations will not have an adverse effect on the integrity of the River Avon SAC. Paragraph 5.147 alludes to this possibility. Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is also a matter for detailed design and consideration as part of the planning application process in accordance with Core Policy 3.	No change
	The supporting text for Amesbury, Bulford and Durrington identifies the need for potential upgrades to the local water supply network; however, the supporting text does not identify that this site is within a Groundwater Source Protection Zone 2. It is recommended that the site allocation	Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the	No change

Plan policy	Recommendations	Council Response	Plan amendment
	supporting text is strengthened by identifying this and the need for further assessment.	planning application process in accordance with Core Policies 3 and 67. The protection of groundwater resources is a matter of detailed design that accords with the Environment Agency's (EA) standing policy advice. Further text would replicate this position.	
	Although only minor adverse effects, to ensure that the full suite of measures identified for this site are covered, it is recommended that the requirement a noise impact assessment is included within the text of site allocation H3.5.	Neighbouring uses are generally low key. Any need for an assessment will be considered through a planning application process.	No change
	It is recommended that the requirement for a Heritage Impact Assessment is included in the site allocation supporting text.	Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58.	No change
Site allocation H3.6 Larkhill Road	The supporting text for Amesbury, Bulford and Durrington identifies the need for potential upgrades to the local water supply network; however, site allocation H3.6 and its supporting text does not identify that this site is within a Groundwater Source Protection Zone 1. It is recommended that the site allocation supporting text is strengthened by identifying this and the need for further assessment.	Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the planning application process in accordance with Core Policies 3 and 67. The protection of groundwater resources is a matter of detailed design that accords with the Environment Agency's (EA) standing policy advice. Further text would replicate this position.	No change
	It is recommended that the HRA proposed wording is added to site allocation H3.5, or that general wording is added to Policy H3 that identifies that upgrades [by others] may need to be completed before development at this site can commence.	Paragraph 5.147 alludes to this possibility. Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is also a matter for detailed design and consideration as part of the planning application process in accordance with Core Policy 3.	No change
	It is recommended that the requirement for a Heritage Impact Assessment is included in the site allocation supporting text.	Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58.	No change

One additional mitigation measure was identified following SA of the modifications proposed to the Plan, in relation to the new site allocation at The Yard, Hampton Park, Salisbury (as reported in

Section 8.4). The moderate adverse effect identified for this site against SA Objective 3 is not fully covered in the proposed supporting text; it is recommended that, in line with other recommendations from the Environment Agency, that the following text is added:

“Any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.”

Monitoring

The Wiltshire Monitoring Framework has been published alongside the Core Strategy, and will be used to check on the effectiveness of the Core Policies and whether they are delivering sustainable development. The Monitoring Framework will be used to ask whether the policy is working, whether it is delivering the underlying objectives of the policy, and what the significant effects of this are. It sets out objectives and targets for each policy, and identifies the indicators which will be used to assess progress against these.

Potential indicators for monitoring the likely significant effects of the Plan have been identified as part of this appraisal and are listed under the relevant objective in the SA Framework. The monitoring framework proposed in this SA Report complements the Wiltshire Monitoring Framework.

Identified significant effects against which monitoring should be undertaken are:

- SA Objective 2: Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings
- SA Objective 3: Use and manage water resources in a sustainable manner
- SA Objective 4: Improve air quality throughout Wiltshire and minimise all sources of environmental pollution
- SA Objective 5a: Minimise our impacts on climate change – through reducing greenhouse gas emissions
- SA Objective 5b: Minimise our impacts on climate change – through reducing our vulnerability to future climate change effects
- SA Objective 8: Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures
- SA Objective 10: Reduce the need to travel and promote more sustainable transport choices
- SA Objective 11: Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth
- SA Objective 12: Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce

No additional monitoring was considered necessary following a review of the modifications to the Plan.

In order to reach a final framework of indicators for the Annual Monitoring Report (AMR) for the Housing Site Allocations Plan, the Council will need to consider the indicators proposed in the SA to identify those which can be most effectively used to monitor the sustainability effects. This will need to be undertaken in dialogue with statutory consultees and other bodies, as in many cases the monitoring information may need to be provided by outside bodies.

Conclusions

From this sustainability assessment, it is clear that many of the significant beneficial effects relate to social and economic considerations. The main significant adverse effects that have been identified relate to environmental issues, due in part to policies allocating sites on greenfield land but also due to the general effects of housing development and population growth.

Overall, it is concluded that the Housing Site Allocations Plan is broadly compatible with sustainability objectives; adverse effects identified are capable of being mitigated and significant social and economic sustainability benefits are likely. However, further requirements to reduce adverse effects could be added to the Plan to strengthen the overall sustainability of the policies and site allocations.

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Wiltshire Housing Site Allocations Plan

Pre-submission
draft plan

Duty to Cooperate

June 2017

Draft Wiltshire Housing Site Allocations Plan
Duty to Cooperate Statement

June 2017

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1. Introduction

1.1. The Localism Act received Royal Assent on 15 November 2011 and subsequent regulations came into force in 2012. It aims to shift power from central government back into the hands of individuals, communities and councils. The Localism Act introduced a legal 'Duty to Cooperate' in relation to plan making, replacing what was previously informal guidance on cooperation. An assessment of whether the 'Duty to Cooperate' has been satisfied by Wiltshire Council will be undertaken during the Wiltshire Housing Site Allocations Plan Public Examination. This report is a statement of how the duty has been met so far by the Council and outlines how Wiltshire Council has co-operated with relevant organisations as part of the plan preparation process.

2. National Context

The Localism Act 2011

2.1. Section 110 of the Localism Act introduces a 'Duty to Cooperate' in relation to planning for sustainable development (as a new section 33A into the Planning and Compulsory Purchase Act 2004). This requires Wiltshire Council to engage constructively, actively and on an on-going basis to maximise planning on strategic cross boundary issues. In effect, for Wiltshire Council, this means in preparing its development plan documents, the Council must co-operate with

- Neighbouring Local Planning Authorities and County Councils (see map of neighbouring authorities in Appendix 1)
- Other local planning authorities and county councils where sustainable development or use of land would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council, or on other strategic issues such as infrastructure which may have an impact; and
- The prescribed bodies defined in part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which are the:
 - Environment Agency
 - Historic England
 - Natural England
 - Highways England
 - Civil Aviation Authority
 - Homes & Communities Agency
 - NHS England
 - Office of Rail Regulation

2.2. The Localism Act requires the Council and relevant statutory agencies to:

- 'engage constructively, actively and on an ongoing basis' with these authorities and bodies to develop strategic policies.'
- set out planning policies to address issues which arise from the process of meeting the Duty; and

- consider joint approaches to plan making.
- 2.3. Wiltshire Council must also engage closely with the Local Enterprise Partnership (SWLEP), in terms of strategic planning matters in emerging development plans and especially where key development proposals are reliant on public infrastructure funding to assist deliverability and any Local Nature Partnership to deliver a strategic approach to encouraging biodiversity.

Housing White Paper

- 2.4. The housing white paper¹ 'Fixing our broken housing market' published in February 2017 sets out the government's plans to reform the housing market and boost the supply of new homes in England. It states that the Government would like to see more and better joint working where planning issues go beyond individual authorities, building on the existing duty to co-operate. The importance of the duty to cooperate to address cross boundary issues is set to grow in importance with further national guidance expected in this respect.

National Planning Policy Framework and Planning Policy Guidance

- 2.5. The National Planning Policy Framework (NPPF) provides some guidance on the interpretation of the duty to cooperate. It emphasises the importance of collaborative working and sets out strategic planning issues² which could cross administrative boundaries, where cooperation might be appropriate, as:
- The homes and jobs needed in a geographical area
 - The provision of infrastructure for transport telecommunications, waste management, water supply, waste water, flood risk and coastal change
 - The provision of retail, leisure and other commercial developments
 - The provision of health, security, community and cultural infrastructure and other local facilities and social infrastructure
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 2.6. The NPPF states that 'local planning authorities will be expected to demonstrate evidence of having successfully cooperated to plan for issues with cross boundary impacts when their Local Plans are submitted for examination'³.
- 2.7. This is reinforced within the Planning Practice Guidance (PPG) which sets out what is required and gives further guidance on the Duty to Cooperate, including that local authority officers and councillors have an important role to play in the process and that the duty requires active and sustained engagement, working together constructively from the outset of plan preparation.

¹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

² NPPF paragraph 156

³ NPPF paragraph 181

3. Local Context

Wiltshire Core Strategy

- 3.1. The adopted Wiltshire Core Strategy (WCS) sets out the spatial strategy for Wiltshire, identifying tiers of settlements as Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages. The WCS then allocates an indicative quantum of development to Principal Settlements, Market Towns and community areas (the latter which include the Local Service Centres and Large and Small Villages). The principle of directing growth to the most sustainable settlements, as well as the quantum of development, has therefore already been set. Significant development can already be accounted for since the beginning of the WCS plan period in 2006 by way of commitments and completions, this plan will seek to identify sites to contribute towards meeting the remaining indicative requirements in each Housing Market Area.
- 3.2. Neighbouring authorities and relevant prescribed bodies have supported the spatial strategy and quantum of development through the Core Strategy process. The spatial strategy and quantum of development can be considered to be strategic issues where the duty to cooperate has already been fulfilled through the Core Strategy process⁴.

Wiltshire Housing Sites Allocations Development Plan Document

- 3.3. The draft plan has two key purposes:
 - a. Reviews settlement boundaries: It reviews all 'settlement boundaries' or 'limits to development' in the Wiltshire Core Strategy (WCS) (except for Chippenham, which has been addressed through the Chippenham Site Allocations Plan); and
 - b. Allocates sites for housing development: It identifies, where necessary, new allocations for housing at settlements to provide for additional housing to help deliver the WCS housing requirement of at least 42,00 dwellings over the plan period 2006 to 2026.

⁴ 'Working Towards a Core Strategy for Wiltshire Statement on Duty to Co-operate' July 2012: <http://www.wiltshire.gov.uk/statement-on-duty-to-co-operate> and Wiltshire Core Strategy: Factual addendum on Wiltshire Council's Statement on Duty to Cooperate, May 2013 <http://www.wiltshire.gov.uk/corestrategydocument?directory=Examination%20Documents&fileref=56> 'Chippenham Site Allocations Plan Duty to Co-operate' July 2015: <http://www.wiltshire.gov.uk/chippenham-duty-to-cooperate.pdf>

- 3.4. The draft plan process has been collaborative and to date has included a number of formal and informal consultation stages as outlined in the table below.

Consultation	Dates
Formal Regulation 18 consultation on the scope of the draft plan. This consultation included neighbouring authorities and prescribed bodies.	24 th March-5 th May 2014
Informal consultation with town and parish councils on draft proposals for amending settlement boundaries.	28 th July – 22 nd September 2014
Informal consultation on the site assessment methodology and initial site options. This consultation included neighbouring authorities and prescribed bodies.	23 rd February – 31 st March 2015
Informal consultation on the approach to Large Villages.	30 th June – 12 th August 2015
Landowner deliverability consultation.	21 st August – 2 nd October 2015
Consultation with neighbouring authorities.	13 th – 24 th June 2016

- 3.5. There has also been ongoing and regular interaction with the prescribed bodies as part of the site selection technical process. This has included liaising with the prescribed bodies at different stages of the site selection process on specific sites and draft allocations.
- 3.6. Given the scope of the draft Plan, in exercising the duty to cooperate, the plan process needs to be alert to any further strategic cross boundary issues that may arise and address them through policies of the draft Plan.

4. Fulfilling the Duty to Cooperate

- 4.1. The next three sections will outline potential cross boundary strategic considerations and how we have engaged and worked with neighbouring authorities and the prescribed bodies on these.
- 4.2. As explained above the draft plan is largely focused on non-strategic housing sites to ensure housing supply is provided across the county for the plan period. Sites are only identified in locations where current housing supply is less than the core strategy indicative housing required for that area. Also explained above, the draft plan sits under the Wiltshire Core Strategy where close cooperation has already occurred on all key strategic issues effecting planning for Wiltshire. As a consequence, it has not been necessary to actively engage with the Civil Aviation Authority or the Office of Rail Regulation as the geographical coverage of the plan does not affect these bodies.

- 4.3. Similarly, the strategic housing issues in which the Homes and Communities Agency (HCA) would have an interest have already been discussed through the Wiltshire Core Strategy. However the council will consult the HCA through the formal stages of plan making to ensure this position doesn't change.
- 4.4. In relation to the Swindon and Wiltshire Local Enterprise Partnership (SWLEP) the draft plan is generally non-strategic in nature and is not directly related to economic matters in the county and therefore there has been limited engagement with the SWLEP. However, the Council will consult the SWLEP through the formal stages of plan making to ensure this situation doesn't change.
- 4.5. There is no Local Nature Partnership currently operating in Wiltshire. Instead local organisations have been and continue to be consulted on the draft plan at statutory stages to ensure that there is opportunity to comment on local biodiversity and landscape issues.

Relevant Strategic Issues

- 4.6. The allocation of non strategic sites for housing development needs to address the full range of planning policy matters. Some site specific impacts could be potentially strategic in nature and across geographical boundaries irrespective of the scale of the site. For example, protecting and enhancing internationally/nationally important ecological designations. Equally, the identification of sites for housing could raise geographic, cross boundary, demand and supply issues that may have implications within Wiltshire and neighbouring authorities.
- 4.7. The following 'strategic' issues have been identified as relevant to the Wiltshire Housing Site Allocations Plan. They have been discussed during plan preparation and work in all areas is both collaborative and ongoing. (Please note this list is not exhaustive)
 - Flood and surface water drainage considerations for individual sites and the impact of cumulative development is being discussed with the Environment Agency.
 - Impact on the Strategic Road Network (SRN) and how that impact can be mitigated is being discussed with the Highways Agency, particularly for potential site allocation in Salisbury.
 - Site specific landscape considerations are being discussed with Natural England.
 - Biodiversity considerations are being discussed with Natural England.
 - Site specific heritage considerations are being discussed with Historic England.

- Any impact on the New Forest National Park by way of potential increased recreational use is being discussed with the New Forest National Park Authority.
- Ensuring that future development helps address and manage phosphate levels in the River Avon, its tributaries and surrounding catchment area. The management of phosphates in the River Avon catchment water system is being discussed with the Environment Agency and Natural England on an ongoing basis. A Nutrient Management Plan has been published and is being monitored⁵.

4.8. In addition to the strategic issues raised above, the prescribed bodies are also involved on a local site specific basis on issues that are non-strategic when considered in isolation but which are essential to the development of the plan and ensuring that wider issues are incorporated in the fabric of the plan. These have also been covered in this report and are summarised in **Appendix 4**.

Cooperation with Neighbouring Authorities

4.9. Wiltshire is a large county with a number of neighbouring district and county authorities as shown in **Appendix 1**. The Wiltshire Housing Site Allocation Plan (WHSA DPD) will be allocating a number of sites on a variety of scales. The neighbouring authorities have been invited to comment at the Regulation 18 consultation, in relation to the evolving methodology for site selection and in a targeted consultation in June 2016 to ensure any issues of a strategic nature are identified. The table below identifies the strategic cross boundary issues identified to date.

Table 1: Strategic issues and partnership working in relation to the preparation of the draft plan with Neighbouring Authorities

Strategic Issue	Partners	Joint working – evidence, arrangements, agreements
Transport infrastructure related to in-commuting to Bath for locations within Wiltshire and in particular any impact on the proposed East of Bath transport measures.	Bath and North East Somerset Council	Meeting held between Bath and North East Somerset Council and Wiltshire Council on the 10 th March 2017
A number of issues are being discussed with the New Forest National Park Authority: <ul style="list-style-type: none"> • Impact on Natura 2000 sites and HRA issues. • Impact of additional recreation use of the 	New Forest National Park Authority Natural England	Regular meetings between Wiltshire Council, the New Forest National Park Authority and Natural England.

⁵ 'Nutrient Management Plan – Hampshire Avon' May 2015
<https://www.gov.uk/government/publications/nutrient-management-plan-hampshire-avon>

national park and the development of a Recreation Mitigation Strategy in line with Core Policy 50 of the Wiltshire Core Strategy.		
Shaftesbury is within the North Dorset District boundary but there are limited land options for further growth within their administrative boundary. In their plan examination report the Inspector recommends that a site in the Wiltshire administrative area adjacent to Wincombe Business Park could be considered for housing or employment use.	North Dorset District Authority	The inclusion of this site would not be in general conformity with the Wiltshire Core Strategy and should therefore be considered through a planned review of the Core Strategy rather than within the context of the WHSA DPD. Joint working will continue with North Dorset District Council on this.
The in combination effects of the Chippenham Plan and WHSA DPD require exploration.	South Gloucestershire District Council	Ongoing discussion with South Gloucestershire District Council
The impact of development at Ludgershall on the wider road network.	Test Valley Borough Council	Correspondence with Test Valley Borough Council and draft plan amended to include reference to the A342 Andover Road accordingly.

Cooperation with Prescribed Bodies

4.10. The table below identifies the strategic issues identified to date with the Prescribed Bodies.

Table 2: Strategic issues and partnership working in relation to the preparation of the draft plan with Prescribed Bodies

Strategic Issue	Partners	Joint Working – evidence, arrangements, agreements
Any impact on the Strategic Road Network (SRN), in particular the impact of development in Salisbury on the SRN.	Highways England	Regular monthly meetings between Wiltshire Council as Highway Authority and Highways England. Plan making is a regular item on the Agenda to share knowledge and identify any potential issues in a timely manner. Specific recognition of

		transport issues in the Salisbury area included in the Plan.
<p>The following issues are being discussed with Natural England on an on-going basis:</p> <ul style="list-style-type: none"> • Levels of phosphate in the River Avon and surrounding area and the monitoring of the Nutrient Management Plan to ensure future development addresses these phosphate issues. • Any potential impact of on the Bath and Bradford Bat Special Area of Conservation. • Environmental issues on Salisbury Plain. • The New Forest Special Area of Protection. • Green infrastructure. • Public rights of way. • Site specific considerations for the proposed allocations. 	Natural England	<p>Meetings and correspondence.</p> <p>Specific recognition of ecological sensitivities in the Trowbridge area included in the Plan (Bath and Bradford on Avon Bats SAC).</p> <p>Specific recognition of biodiversity issues in the Salisbury area included in the Plan (River Avon SAC).</p> <p>Specific recognition of biodiversity issues in the Warminster area included in the Plan (River Avon SAC).</p>
<p>The following issues have been discussed with the Environment Agency on an ongoing basis:</p> <ul style="list-style-type: none"> • Flood and surface water drainage consideration for individual sites and the impact of cumulative development is being discussed with the Environment Agency. • Levels of phosphate in the River Avon and surrounding area and the monitoring of the Nutrient Management Plan to ensure future development addresses these phosphate issues. 	Environment Agency	<p>Meetings and correspondence</p> <p>Specific recognition of biodiversity issues in the Salisbury area included in the Plan (River Avon SAC).</p> <p>Specific recognition of biodiversity issues in the Warminster area included in the Plan (River Avon SAC).</p>
<p>The following issues have been discussed with English</p>	English Heritage	Meetings and correspondence

Heritage: <ul style="list-style-type: none"> • Impact on heritage assets. • How heritage should be assessed through the site selection process. • Site specific considerations for the proposed allocations. 		
Requirements for GP capacity have been sought from NHS England.	NHS England	Correspondence through the technical site selection process.

5. Conclusions and Next Steps

5.1. The principle of directing growth to the most sustainable settlements has already been set in the WCS. Neighbouring authorities and relevant prescribed bodies have supported the spatial strategy and quantum of development through the WCS process. The spatial strategy and quantum of development can be considered to be strategic issues where the duty to cooperate has already been fulfilled through the WCS process. This draft plan must be in conformity with the WCS and builds upon the collaboration and cooperation that has already been carried out.

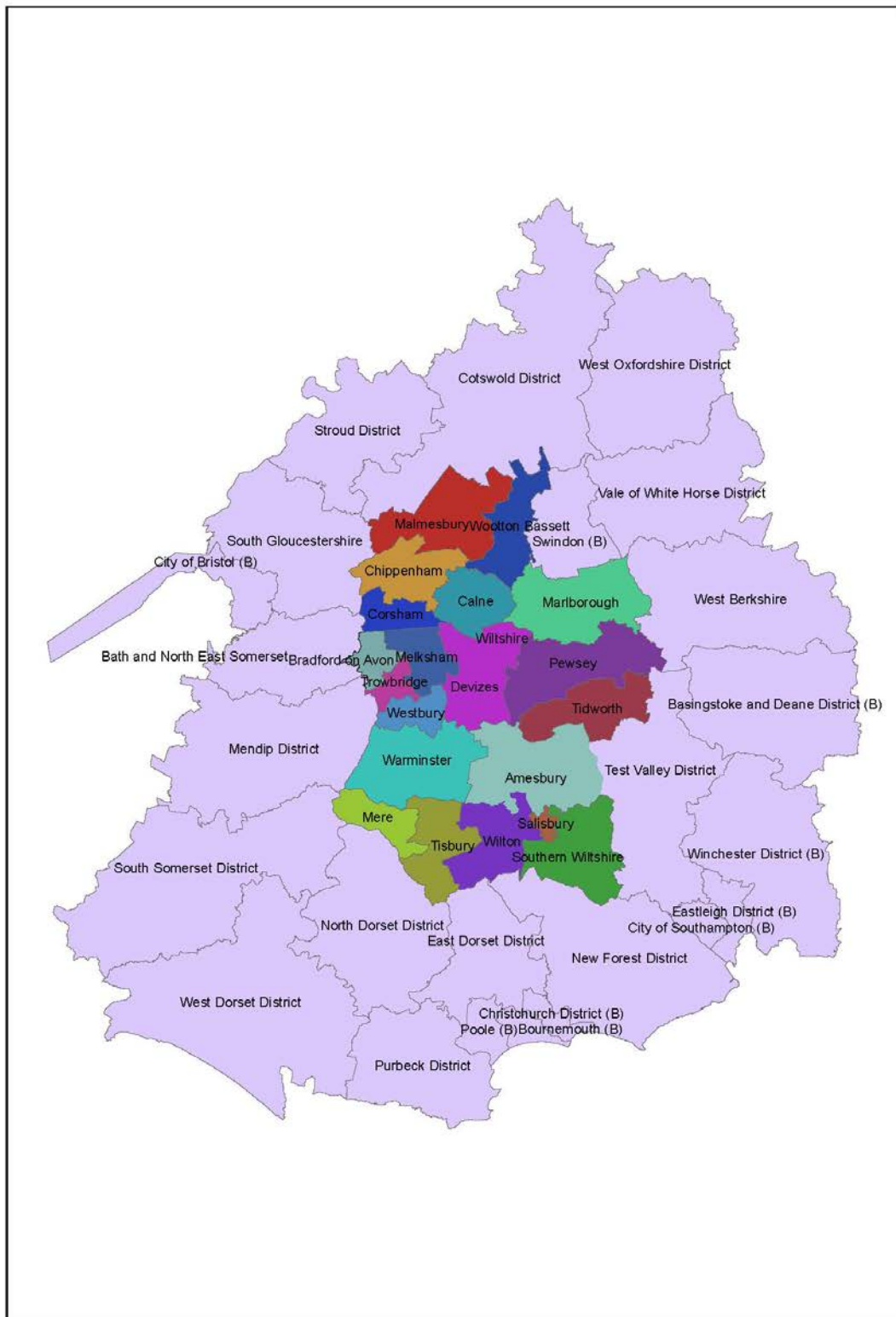
5.2. As outlined in the report there have been a number of cross boundary strategic thematic and place based themes that are being discussed with the relevant prescribed bodies and neighbouring authorities.

5.3. The draft plan has now moved forward to the formal 6 week public consultation and further cooperative working will be carried out as part of this. In particular the following actions will be carried out:

- Ongoing work with Natural England and the Environment Agency to address:
 - The proactive management of phosphates associated with development through monitoring the current Nutrient Management Plan.
 - Impacts associated with increased recreational pressure (derived from additional housing) on the Bradford and Bath Bats and Salisbury Plain Special Areas of Conservation.
- On-going discussion with Highways England on potential impacts on the Strategic Road Network, particularly from development in Salisbury.
- Ongoing discussion with all prescribed bodies on site specific requirements.

5.4. This report will be submitted with the Wiltshire Housing Site Allocations Development Plan Document (draft plan) for Examination.

Appendix 1: Map showing Wiltshire Community Areas and neighbouring authorities



Appendix 2: Evidence showing how duty to cooperate has been implemented with neighbouring authorities

Strategic Issue	Stakeholder	Why engaged	How engaged	When engaged	Key outcomes
Transport infrastructure related to in commuting to Bath.	Bath and North East Somerset Highways England	Ongoing dialogue in relation to current and longer term plans for Bath and North East Somerset and Wiltshire. Included discussions to ensure any impact on East of Bath transport measures and wider transport issues have been considered.	Correspondence Meeting 10-3-17	Mid 2016	No concerns about emerging site allocations plan proposals. Commitment to ongoing dialogue in relation to longer term plans.
Assessment of impact on the New Forest National Park and impact of potential additional recreation use.	New Forest National Park Authority Natural England	To ensure impact on the New Forest National Park and Natura 2000 sites has been considered.	Correspondence and meetings	From 2014	Development of a Recreation Mitigation Strategy.
Consideration of a site in Wiltshire to address population growth in Shaftesbury North Dorset.	North Dorset District Authority	Outside of the context of the draft plan			Outside of the context of the draft plan
Consider any impact of in combination effects of the	South Gloucestershire District Council	Issue flagged up during consultation	Correspondence	Mid 2016	

Strategic Issue	Stakeholder	Why engaged	How engaged	When engaged	Key outcomes
Chippenham Plan and WHSA DPD on infrastructure.					
The impact of development at Ludgershall on the wider road network.	Test Valley Borough Council	To address any cross boundary impact on the wider road network.	Correspondence	April 2017	Correspondence with Test Valley Borough Council stated that at an officer level there was no objection to the principle of the development. They highlighted the need to consider the visual/ landscape impact on the approach to Ludgershall from Test Valley and the need to recognise the need to assess possible transport impact on the local highway. It was requested that this should include the A342 Andover Rd. The draft plan text has been amended accordingly.
Implications of housing requirements of the wider South Wiltshire Housing Market Area that are within the New Forest	New Forest National Park Authority New Forest District Council	Outside of the context of the draft plan			Outside of the context of the draft plan

Appendix 3: Evidence showing how duty to cooperate has been implemented with prescribed bodies

Strategic Issue	Stakeholder	Why engaged	How engaged	When engaged	Key outcomes
Phosphates issues	Natural England Environment Agency	Specialist input on phosphate management	Ongoing meetings and correspondence	From 2014	Ongoing work towards agreeing a Nutrient Management Plan and acceptable mitigation to address existing phosphate issues relates to the River Wylde and surrounding area.
Protection of the Bath and Bradford Bat Special Area of Conservation.	Natural England	Specialist input on the special area of conservation and bat populations	Ongoing meetings and correspondence	From 2014	On-going work to ensure the protection of the bat population and habitat related to the Bath and Bradford Bat Special Area of Conservation.
Consideration of impact on Salisbury Plain.	Natural England	Specialist input on habitat protection on Salisbury Plain.	Ongoing meetings and correspondence	From 2014	On-going work to ensure that any wider impact of development on Salisbury Plain due to increased recreational impact is taken into account.
Consideration of impact on the New Forest Special Area of Conservation.	Natural England New Forest National Park Authority	Specialist input on habitat protection in the New Forest National Park.	Ongoing meetings and correspondence	From 2014	On-going work to ensure that any wider impact of development on the New Forest due to increased recreational impact is taken into account.
Incorporation of green infrastructure considerations in development proposals.	Natural England	Specialist input on green infrastructure	Ongoing meetings and correspondence	From 2014	On-going work to ensure the maintenance and development of a green infrastructure in Wiltshire.
Flood and surface water drainage consideration.	Environment Agency	Specialist input on flood and	Ongoing meetings and	From 2014	Development will be onsite with the least impact on

Strategic Issue	Stakeholder	Why engaged	How engaged	When engaged	Key outcomes
	Wiltshire Council Drainage Team	drainage	correspondence		flood land and with drainage issues that have mitigation actions in place.
Consideration of any impact on the Strategic Road Network.	Highways Agency	Specialist highways input	Ongoing meetings and correspondence	From 2014	Ensure any impact on the strategic road network is considered and mitigated.
Review of methodology to ensure that it acknowledged a positive strategy towards conservation and enjoyment of the historic environment, and that it enabled historic assets to be conserved in a manner appropriate to their significance. A sliding scale of impact and grouping historic designations would be beneficial.	Historic England	Issue flagged up during consultation	Correspondence	2015	Methodology amended to reflect suggestions.
Advice on the proposed draft plan allocation H2.6 Southwick Court, Trowbridge.	Historic England	Specialist historic environment input	Correspondence	2017	Changes made to draft policy H2.6 and supporting text.
Advice on the proposed allocation land east of the Deben, Warminster	Historic England	Specialist historic environment input	Correspondence	2017	Changes made to paragraph 5.79
Advice on text regarding avoiding impact on the universal value of Stonehenge and Avebury World Heritage Site	Historic England	Specialist historic environment input	Correspondence	2017	Changes made to paragraph 5.120
Advice on ensuring a consistent approach to requirements for keeping and improving public rights of way	Natural England	Specialist natural environment input	Correspondence	2017	Changes to the draft plan supporting text to reflect comments on public rights of way
Advice for proposed draft	Natural England	Specialist natural	Correspondence	2017	Changes to supporting

Strategic Issue	Stakeholder	Why engaged	How engaged	When engaged	Key outcomes
allocations at Harnham and considering how to link to public rights of way to the west of the site.		environment input			text.
Advice on the transport evidence base.	Highways England	Specialist highways input	Correspondence	2017	Change to text tor reference the transport evidence base.

Appendix 4: Site Specific Outcomes

Area, Site or issue	Stakeholder	Why engaged	How engaged	When engaged	Outcomes
East Housing Market Area					
Impact on the road network for allocation H1.1 land at Empress Way, Ludgershall.	Highways England	Specialist input on impact on the SRN	Correspondence	Spring 2017	Further work with transport on any impact on the A303T road
North and West HMA					
Trowbridge – there are a number of key issues that affect planning for the whole town of Trowbridge. Development will increase demand for primary healthcare and funding contributions will be required to expand GP services and dentistry.	NHS England	Specialist input on primary health care	Correspondence at stages of the technical site selection process – see paragraph 4.6 for further detail.	Throughout the process	Supporting text requires contributions to be justified on a site by site basis in discussion with the Clinical Commissioning Group and NHS England (paragraph 5.45 of the draft plan).
Allocation H2.6 and paragraph 5.68 of the draft plan. Impact on Grade II* listed Southwick Court Farmstead.	Historic England	Specialist input on heritage	Correspondence at stages of the technical site selection process – see paragraph 4.6 for further detail.	Throughout the process	Paragraph 5.76 states: The area is of historic significance as water meadows associated with the Grade II* Listed Southwick Court Farmstead. An essential objective of detailed design will be to minimise harm to its significance. The setting to this heritage asset will be preserved, to the greatest extent possible, informed by the results of more detailed Heritage Impact Assessment. Taking account of the weight

Area, Site or issue	Stakeholder	Why engaged	How engaged	When engaged	Outcomes
					attached to the significance of the asset any residual harm requires a clear and convincing justification and should not be substantial.”
South Housing Market Area					
Development of draft policy H3.1 land at Netherhampton Road in Salisbury.	Environment Agency	Specialist input on flood and drainage	Correspondence at stages of the technical site selection process – see paragraph 4.6 for further detail.	Throughout the process	<p>Draft policy H3.1 includes the following requirements following liaison with the Environment Agency:</p> <ul style="list-style-type: none"> • a Country Park of at least 10ha in size with associated parking and facilities, located in the east and south of the site, to provide an important buffer to open countryside, Harnham Hill Chalk Pit SSSI and Harnham Slope County Wildlife Site and to include substantial new tree planting reflecting typical downland characteristics • strategic landscaping and open space provision to retain and reinforce existing hedgerows

Area, Site or issue	Stakeholder	Why engaged	How engaged	When engaged	Outcomes
					<p>and establish new areas of tree planting</p> <p>The supporting text was also influenced by the Environment Agency at paragraph 5.113 which requires a water infrastructure capacity appraisal, a flood risk assessment, sufficient land to be put aside for surface water management and a surface water drainage scheme.</p>
Development of draft policy H3.1 land at Netherhampton Road in Salisbury.	Historic England	Specialist input on heritage	Correspondence at stages of the technical site selection process – see paragraph 4.6 for further detail.	Throughout the process	<p>Draft policy H3.1 includes the following requirements following liaison with the Historic England:</p> <ul style="list-style-type: none"> • all development to be located below the 75m contour in order to provide a sufficient visual buffer to the open countryside and maintain visual connections to important landmark features
All sites affected by heritage assets.	Historic England	Specialist input on heritage	Correspondence at stages of the technical	Throughout the process	Heritage Impact Assessment required where appropriate. This

Area, Site or issue	Stakeholder	Why engaged	How engaged	When engaged	Outcomes
			site selection process – see paragraph 4.6 for further detail.		has been included in supporting text.

Appendix 5

Audit trail of key decisions and processes

Stage of plan	Date	Key decision or process
Formal regulation 18 consultation	24 th March-5th May 2014	Input of neighbouring authorities and prescribed bodies on scope
Targeted consultation with neighbouring authorities	13 th – 24 th June 2016	Targeted consultation with neighbouring authorities on emerging findings
Ongoing site selection technical process	Ongoing 7 stage process	Prescribed bodies have been consulted on sites filtering through stages 3, 4a and 4b of the site selection process where relevant. This has been to provide specialist input and identify any strategic issues.
Plan development	April 2017	Liaison with prescribed bodies on draft proposals

This document was published by the Spatial Planning team, Wiltshire Council, Economic Development and Planning Services.

For further information please visit the following website:

<http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan.htm>

Addendum to the Wiltshire Housing Site Allocations Plan Duty to Cooperate Statement June 2017

1.0 Introduction

- 1.1 This report is an addendum to the 'Wiltshire Housing Site Allocations Plan Pre-submission draft plan Duty to Cooperate (June 2017) Statement'¹. The addendum is a statement of how the Council has continued to positively and pragmatically address the duty to cooperate, constructively engaged with relevant organisations as part of the plan preparation process and continued to comply with Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended).
- 1.2 This addendum covers the period from July 2017 to May 2018 and relates to the formal Regulation 19² consultation on the Pre-submission draft Wiltshire Housing Site Allocations Plan ('the draft Plan') that was held in the summer 2017³ and subsequent engagement. It provides an overview of the ongoing cooperation with prescribed bodies⁴ and neighbouring authorities and shows how the identified strategic issues have been addressed⁵. The addendum should be read with the main duty to cooperate statement published alongside the draft Plan in June 2017.

2.0 Maintaining our commitment to fulfilling the Duty to Cooperate

- 2.1 The sections below set out how the Council has continued to engage constructively and on an on-going basis with prescribed bodies and neighbouring authorities to work on strategic issues identified in the Wiltshire Housing Site Allocations Plan Pre-submission draft plan Duty to Cooperate Statement June 2017.

Pre-submission consultation on the draft Plan

- 2.2 A Regulation 19⁶ public consultation was held on the draft Plan in the summer 2017. All prescribed bodies and neighbouring authorities were consulted on the Regulation 19 draft Plan. **Appendix 1** of this Addendum outlines a summary of comments received from prescribed bodies and neighbouring authorities to that consultation and our response. All main issues raised had already been identified as strategic issues through the duty to cooperate process and the Council continue to work positively with prescribed bodies and neighbouring authorities on these matters.
- 2.3 An email was also sent to all neighbouring authorities and prescribed bodies during the consultation on the draft Wiltshire Housing Site Allocations Plan inviting them to meet with the Council if considered relevant and necessary within the context of strategic issues (email sent 28th July 2017). In direct response, meetings were held with the Dorset Councils Partnership, Natural England and Historic England. Further detail in respect of these meetings (i.e. the purpose for meeting, matters discussed and outcomes) can be found in **Appendix 2: Liaison with neighbouring**

¹<http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Pre-Submission%20Consultation%20July%202017&filerref=14>

² Town and Country Planning (Local Planning) (England) Regulations 2012

³ Regulation 19 Pre-submission consultation held Friday 4th July 2017 until Friday 22nd September 2017

⁴ Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 4

⁵ Paragraphs 4.6-4.8, Wiltshire Housing Site Allocations Plan Duty to Cooperate Report June 2017

⁶ Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 19

authorities since July 2017 and Appendix 3: Liaison with prescribed bodies since July 2017, alongside other details about the Council's ongoing engagement. These Appendices therefore also include:

- details of ongoing regular meetings with Highways England to discuss the impact of planned development on their assets;
- details of partnership working with those involved in resolving the management of phosphates through the review of commitments set out in the Nutrient Management Plan; and
- general meetings with neighbouring authorities covering updates to plan preparation and consideration of cross-boundary themes.

3.0 Relevant Strategic Issues and Current Outcomes

3.1 The 'Wiltshire Housing Site Allocations Pre-submission draft plan Duty to Cooperate Statement June 2017' ('the Duty to Cooperate Report') identified the following strategic issues:

- Flood and surface water drainage considerations for individual sites and the impact of cumulative development are being discussed with the Environment Agency.
- Impact on the Strategic Road Network (SRN) and how that impact can be mitigated is being discussed with the Highways England, particularly for potential site allocations in Salisbury.
- Site specific landscape and biodiversity considerations are being discussed with Natural England.
- Site specific heritage considerations are being discussed with Historic England.
- Any impact on the New Forest National Park by way of potential increased recreational use is being discussed with the New Forest National Park Authority.
- Ensuring that future development helps address and manage phosphate levels in the River Avon, its tributaries and surrounding catchment area. The management of phosphates in the River Avon catchment water system is being discussed with the Environment Agency and Natural England on an ongoing basis.

3.2 No further strategic cross boundary issues were identified through the formal pre-submission consultation on the draft Plan. On-going engagement will, in particular, focus on securing mitigation for protected bat species at Trowbridge; and wider strategic issues associated with addressing the management of phosphates within the catchment of the River Avon Special Area of Conservation (SAC).

3.3 This statement will run through each strategic issue in turn to show how ongoing cooperation with the relevant prescribed bodies and neighbouring authorities has assisted the Council in preparing the draft Plan. Further to this, **Appendix 2** lists relevant correspondence and meetings held with neighbouring authorities and **Appendix 3** lists relevant correspondence and meetings held with prescribed bodies. The purpose for on-going work with these bodies is firmly focussed on resolving issues to ensure outcomes achieve the delivery of planned sustainable development in Wiltshire in conformity with the Wiltshire Core Strategy⁷.

⁷ As outlined in paragraph 4.2 of the Duty to Cooperate Statement (June 2017) the Wiltshire Housing Site Allocations Plan is a subsidiary document to the adopted Wiltshire Core Strategy

Strategic issue: Flood and surface water drainage considerations for individual sites and the impact of cumulative development

- 3.4 Through joint working and their response to the Regulation 19⁸ consultation the Environment Agency has confirmed that in regard to environmental issues they are satisfied with the Plan provided built development will only occur on flood zone 1 and that only clean surface water is discharged into the ground in Source Protection Zones. These requirements are both met by the draft Plan.
- 3.5 The Environment Agency has provided further detailed comments on each of the proposed allocations. Matters raised included: detailed suggestions for managing surface water; incorporating natural flood management/drainage measures (e.g. wet woodland planting, use of ‘leaky weirs’ etc); consideration of likely effects of climate change and the need to apply appropriate buffer strips adjacent to flood zones 2 or 3. These comments have been discussed with the Environment Agency and appropriate amendments to draft Plan text have been incorporated into the Council’s Schedule of Proposed Changes to the draft Plan. Details of the points raised by the Environment Agency, along with the Council’s response can be found in **Appendix 3**.

Strategic issue: Impact on the Strategic Road Network (SRN) and how that impact can be mitigated

- 3.6 The Council meets on a monthly basis with Highways England to engage and work cooperatively on strategic issues relating to the Strategic Highway Network (SRN). For the draft Plan, the potential impact of planned development on the SRN was identified as a strategic issue as the A36 and M4 are considered to be critical routes on a wider network of roads through the County.
- 3.7 The Highways England response to the Regulation 19⁹ consultation specifically identified two areas where impact on the SRN required further consideration as discussed below.

The potential for proposed housing allocations near Chippenham to have an impact on Junction 17 of the M4

- 3.8 For these sites Highways England stated:

“The Plan introduces three other allocations in the vicinity of M4 junction 17 which were not included in the Chippenham Site Allocations Plan. These are at Hullavington (50 dwellings), Yatton Keynell (30 dwellings), and Crudwell (50 dwellings). There is no transport evidence to show that these sites would or would not impact on the SRN.”

- 3.9 Further to discussion at a meeting, Highways England confirmed via email (received 26th February 2018) that the intention of the advice about Junction 17 was to suggest it should be made clear in the draft Plan why no further strategic assessment of potential highway impacts, particularly in respect of the SRN, had been carried out to support the allocation of these sites. In this regard, Highways England were not objecting to the proposals *per se*, more that they considered the draft Plan text should be clear what would be expected in terms of transport evidence to support a planning application.

⁸ Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 19

⁹ Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 19

- 3.10 In this instance the Council consider that the scale of the allocations proposed at the Large Villages of Hullavington, Yatton Keynall and Crudwell are not of a scale that would have a significant impact on the M4 and therefore no further strategic highways assessment has been carried out. Appropriate references are already made in the draft Plan for Transport Assessments to accompany applications.

The potential for proposed housing allocations in Salisbury to generate impacts on the A36 Trunk Road network.

- 3.11 There is ongoing collaborative working with Highways England to understand and address the impact of the proposed allocations in Salisbury on the A36. The existing Transport Strategy for Salisbury, including detailed modelling of the network has been reviewed and a report has been produced (Atkins, May 2018). The modelling work and wider Salisbury Transport Strategy Draft Strategy Refresh 2018 identify a package of mitigation to support the proposed allocations in the City. A Statement of Common Ground with Highways England will be presented through the Examination process to reflect the up to date position.

Strategic issue: Site specific landscape and biodiversity considerations

- 3.12 Work is ongoing with Natural England to develop and publish the Trowbridge Bat Mitigation Strategy (referred to in the draft Plan as Trowbridge Recreation Management Mitigation Strategy). The preparation of this document is linked to Core Policy 29 'Spatial Strategy: Trowbridge Community Area' of the Wiltshire Core Strategy, which recognises the need to safeguard protected bat species and their habitats associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). It will address issues raised by Natural England through meetings and in their response to the Regulation 19 consultation.
- 3.13 The Trowbridge Bat Mitigation Strategy is being prepared in two phases. The first phase will be completed to support the draft Plan. It will guide the delivery of necessary mitigation measures and thereby help support development of the proposed allocations and protect nationally significant Bechstein's bats associated with the Bradford-on-Avon and Bath Bats SAC. The second phase of the Strategy will support the Local Plan Review process¹⁰ by guiding development and strategic mitigation measures to support growth at the town over the period up to 2036. A Statement of Common Ground will be presented through the Examination process to reflect the up to date position.
- 3.14 In a meeting held on the 20th September 2017 and in their Regulation 19¹¹ consultation response Natural England has also commented on the need to protect public rights of way and open space and how such matters had been considered through the Plan preparation process. Having reviewed the evidence prepared to date and the commitments in the draft Plan the Council is confident that it has ensured that public rights of way and open space have been treated consistently on all proposed site allocations through the site selection process. Moreover, a review has been carried out on the draft Plan text to ensure relevant open space and public rights of way have been considered and addressed in line with the policies of the Wiltshire Core Strategy and National Planning Policy Framework. Proposed changes have been suggested to improve the clarity of the draft Plan to reflect this..

¹⁰ The review of the Wiltshire Core Strategy.

¹¹ Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 19

Strategic issue: Site specific heritage considerations

- 3.15 Collaborative meetings have been held with Historic England and Wiltshire Council to discuss heritage issues relating to the proposed allocations.
- 3.16 In a meeting held with Historic England on the 30th August 2017 and in their subsequent consultation response to the pre-submission draft Plan Historic England sought assurances that, in line with legislation and national policy, great weight had been applied to heritage assets. In particular, the consultation response identified heritage concerns on six of the proposed allocations in particular as having heritage sensitivities associated with the significance of certain assets.
- 3.17 Through discussions with Historic England it was agreed that an independent high level Heritage Impact Assessment (HIA) would be commissioned for six of the proposed allocations. Advice was given by Historic England on the type of assessment that would be appropriate for this stage of plan making and to ensure that the brief for the work covered the appropriate specialist heritage requirements.
- 3.18 Land Use Consultants were appointed by Wiltshire Council to carry out the heritage impact assessment and Historic England were involved in a review of the findings.
- 3.19 The HIA assesses the significance of heritage assets and the contribution made by their respective settings. It also assesses the scale of risk associated with development proposals and concludes on the scale of likely harm that would be attributed to the significance of heritage assets. In this sense, the HIA is a useful document as it augments the Council's existing evidence base. The six sites subject to further heritage assessment were:
- H2.2 Land off the A363 at White Horse Business Park, Trowbridge
 - H2.3 Elizabeth Way, Trowbridge
 - H2.4 Church Lane, Trowbridge
 - H2.6 Southwick Court, Trowbridge
 - H2.7 East of the Dene, Warminster
 - H3.3 North of Netherhampton Road, Salisbury
- 3.20 In the case of all six sites, the HIA concluded that less than substantial harm would result from development proceeding. However, the position in respect of four sites (site allocations H2.2, H2.6, H2.7 and H3.3) is more complex, with the findings of the HIA concluding that harm would fall with the higher-end of the less than substantial harm category. In the light of the HIA and representations received through the consultation, proposed changes have been prepared to the draft Plan to clarify, where appropriate, the heritage assets relating to each site and emphasise the special regard that needs to be applied to conserving these in a manner appropriate to their significance. Details of how the Council has sought to address the concerns raised by Historic England can be found in Appendices 1 and 3.

Strategic issue: Impact on the New Forest National Park by way of potential increased recreational use

- 3.21 As with all neighbouring authorities, Wiltshire Council works closely with both the New Forest District Council and the New Forest National Park Authority on cross boundary issues. One such issue involves addressing housing need in the constrained New Forest National Park area, a matter that is not relevant to this Plan but a strategic issue for the review of the Wiltshire Core Strategy.

- 3.22 The Duty to Cooperate Statement identified the impact of housing development on the New Forest National Park in terms of increased recreational pressure as a significant issue from an ecological perspective. In their response to the Regulation 19 consultation, the New Forest National Park Authority acknowledges that none of the proposed allocations are within the visitor catchment of the New Forest Special Protection Area (SPA) but that increased recreational pressure is still a wider issue that requires future cross boundary working. The Council acknowledges the importance of this issue, but is considered to be outside the context of this draft Plan and will be addressed through the Local Plan Review. Funding has now been secured through a partnership bid¹² to the Planning Delivery Fund (Joint Working) to develop evidence to understand the impact of recreational pressure on the New Forest arising from new development as a basis for developing an appropriate framework for mitigation.
- 3.23 Another issue shared with the New Forest planning authorities is the response to the strategic issue of managing phosphate levels in the River Avon catchment. This matter is addressed in more detail below.

Strategic issue: Ensuring that future development helps address and manage phosphate levels in the River Avon, its tributaries and surrounding catchment area

- 3.24 Following the preparation and adoption of the Wiltshire Core Strategy, regular, ongoing joint working has been undertaken between the Environment Agency, Natural England, Wessex Water, Christchurch Borough Council, New Forest District Council, New Forest National Park Authority and Wiltshire Council about the management of phosphates. A Nutrient Management Plan was prepared alongside the Wiltshire Core Strategy to address this issue with targets set to work towards managing phosphate levels in the Hampshire Avon Special Area of Conservation (SAC).
- 3.25 Since the completion of the Nutrient Management Plan, monitoring has indicated that measures to encourage catchment sensitive farming practices within the River Avon catchment are likely to be less successful in reducing phosphates than envisaged. As a result, the Environment Agency and Natural England have called for more controls to be placed on development to manage, or at least off-set their phosphate load. The Council and all partners have therefore been working together to identify a way forward.
- 3.26 The challenge for all stakeholders lies in ensuring that the draft Plan (and other qualifying development within the catchment area) is unlikely to have adverse effects on the integrity of the SAC due to phosphate loads for it to be Habitats Directive compliant. Regular meetings have been and continue to be held between all partners to reach agreement on the approach to identifying effective and proportionate measures to remove or offset the phosphate load from qualifying developments and how the Council and all parties will work together.
- 3.27 Constructive progress is being made on a Memorandum of Understanding (MoU) between all partners. Agreement will be reached on the approach to identifying measures to ensure that residential development will be 'phosphate neutral', as defined by the MoU. The MoU will provide an interim position to cover the

¹² Between Wiltshire Council, Test Valley Borough Council, New Forest National Park Authority, New Forest District Council, Southampton City Council, Eastleigh Borough Council and Natural England

implementation of the Core Strategy housing requirement including the allocations proposed in the Wiltshire Housing Site Allocations Plan whilst further joint working and technical work is carried out to develop solutions to reducing phosphate levels in the River Avon in the longer term. A Statement of Common Ground will be presented through the Examination process to reflect the up to date position.

4.0 Conclusions

4.1 Wiltshire Council recognises and fully acknowledges the importance of the duty to cooperate and value of collaboration between bodies to address the strategic issues outlined in this report. In this regard, the Council can confidently demonstrate that it continues to fulfill its legal obligations.

4.2 Collaborative working will continue leading up to and during the Examination process, in particular with regard to:

- Completion of the Memorandum of Understanding being developed jointly with the Environment Agency, Natural England, Wessex Water, Christchurch Borough Council, New Forest District Council and New Forest National Park Authority to set out the approach to supporting phosphate neutral development in the catchment area of the River Avon Special Area of Conservation.
- Agreeing Statements of Common Ground; including with Highways England to outline how the findings of the Salisbury Transport Strategy Refresh will ensure the impact on the A36 Strategic Road Network can be mitigated.

Appendix 1: Table showing summary of the responses received from prescribed bodies and neighbouring authorities to the consultation in the summer of 2017 (table taken from the Regulation 22 (1) (c)):

Historic England
<p>Summary of main issues raised:</p> <p>Historic England states that it will be important to clearly demonstrate within the Plan that the approach to development affecting designated and non-designated heritage assets is appropriately justified, that it is consistent with national policy, and likely to be effective in helping to deliver the requirements of the Wiltshire Core Strategy. In accordance with legislation and national policy, great weight must be applied to the conservation of the affected heritage assets. It may therefore be useful to produce a specific heritage topic paper/statement making the case for the spatial strategy and individual allocations from a heritage perspective.</p> <p>They suggest further evidence is required to inform site suitability and deliverability in accordance with national policy for the following proposed allocations:</p> <ul style="list-style-type: none"> • H2.2 Land off the A363 at White Horse Business Park, Trowbridge • H2.3 Elizabeth Way, Trowbridge • H2.4 Church Lane, Trowbridge • H2.6 Southwick Court, Trowbridge • H2.7 East of the Dene, Warminster • H3.3 North of Netherhampton Road, Salisbury <p>Action taken by the Council in response:</p> <p>In consultation with Historic England, further evidence in the form of a high level Heritage Impact Assessment (HIA) was commissioned, to augment the Council's existing evidence base and, where necessary, help refine proposed allocations.</p> <p>The Heritage Impact Assessment produced for the Council naturally reflects statutory¹³ and national planning policy advice and takes a precautionary approach to the assessment of heritage assets and the degree to which their significance would be harmed by development proceeding. However, the assessment nonetheless concludes for all sites that the scale of harm would be less than substantial and for two site allocations (H2.3 Elizabeth Way, Trowbridge; H2.4 Church Lane, Trowbridge) there were low risks associated with development and can proceed as allocations. The report identifies more significant risks with proceeding with the H2.6 Southwick Court (Trowbridge), H2.2 Land off A363 at White Horse Business Park (Trowbridge), H2.7 East of Dene (Warminster) and H3.3 Land North of Netherhampton Road (Salisbury) site allocations that merit further consideration.</p> <p>As defined by paragraph 134 of the National Planning Policy Framework, where a proposed development would lead to 'less than substantial harm' to the significance of a designated heritage asset (which can be of varying degrees of impact), should be weighed against the public benefits of development proceeding. This important consideration, together with an explanation of less than substantial harm, has been set out in more detail within a 'Heritage Note' (appended to the Cabinet/Council Committee Report) that will be submitted to the Secretary of State to inform the Examination process.</p>

¹³ Planning (Listed Buildings and Conservation Areas) Act 1990, Sections 66(1) and 77(1)

Having carefully considered the evidence from all sources and options for how to proceed, it is considered that there is no justification for recommending deletion of the proposed sites on heritage grounds. However, in the light of the HIA and comments by Historic England, a series of Proposed Changes have been prepared to reflect the evidence and comments submitted by Historic England. The Changes emphasise the special regard that needs to be applied to conserving heritage assets in a manner appropriate to their significance (including the contribution made by their settings).

Environment Agency

Summary of main issues raised:

In response to the consultation, Natural England and the Environment Agency raised concerns about the soundness of the draft Plan and the potential impact of proposed growth on the River Avon Special Area of Conservation (SAC), an internationally important wildlife site. They considered there to be insufficient evidence and certainty that development is unlikely to have an adverse effect on concentrations of phosphates within the River Avon SAC. In this regard, concerns were raised with the Habitats Regulations Assessment accompanying the draft Plan, which is published as a supporting paper to this report. This identified issues with the implementation of the Nutrient Management Plan (NMP) but concluded that with mitigation there are unlikely to be any adverse effects.

Phosphates in relation to the River Avon SAC is a complex and technical issue, as recognised by Core Policy 69 of the Wiltshire Core Strategy that relates to the Protection of the River Avon SAC and refers to the role of the Nutrient Management Plan (NMP) in managing phosphate levels. In simple terms, the reduction in phosphates anticipated through catchment sensitive farming practices has not been achieved. Since making their response to the draft Plan, the Environment Agency have confirmed that they will be reviewing some of the underlying assumptions in the NMP. As such, they have simplified their advice and require that development should be designed to be phosphate neutral.

The Environment Agency is otherwise satisfied with the Plan proposals, provided that built development only occurs within Flood Zone 1. For sites in Groundwater Source Protection Zone 1 the Environment Agency advises that there must be no discharges to ground other than clean, uncontaminated surface water. In addition, it was advised that the predicted effects of climate change must be taken into account by applying buffer zones to flood zones 2 and 3 and water courses within or in the vicinity of proposed sites.

The Environment Agency recommends that a requirement for drainage strategies is added to the policies relating to all proposed site allocations.

Natural flood management measures (e.g. 'leaky weirs', woodland planting etc), surface water attenuation features and Sustainable Drainage Systems (SuDs) should be incorporated into proposed development to manage surface water.

As a number of the proposed allocations are within groundwater Source Protection Zones, the Agency advises that the Council must ensure all proposed development activities are in line with [groundwater policy](#).

The Environment Agency has also provided individual comments on the site allocations.

Action taken by the Council in response:

In preparing the draft Plan, the Council undertook the sequential test and built development is only proposed to occur within flood zone 1. Flood risk from all sources will

be addressed through site design and mitigation. In line with Core Policy 67 'Flood Risk' and Core Policy 68 'Water Resources' of the Wiltshire Core Strategy, national policy and Environment Agency guidance, the Council will ensure , where appropriate to circumstance, that buffer strips are provided in the design and layout of schemes to account for the predicted effects of climate change in respect of the areal extent of flood zones 2 and 3. Proposed changes to the draft Plan have been prepared to ensure buffer areas, and comprehensive drainage strategies (including Sustainable Drainage Systems (SuDS) are delivered through subsequent planning applications.

Groundwater protection zones have been considered as part of the site selection process but a series of proposed changes to the draft Plan have been prepared to address the comments received from the Environment Agency.

The Council has been working constructively with all relevant parties: Natural England, Wessex Water, the Environment Agency and neighbouring authorities (e.g. New Forest District Council) on the phosphates issue. Progress is being made on a 'Memorandum of Understanding' ('the MoU'), which has been drafted to set out the approach to identifying effective and proportionate measures to remove or off-set the phosphate load from qualifying developments and how the Council and all parties will work together. This will give greater certainty with respect to nutrient management, sufficient for the Council to conclude that the draft Plan will support phosphate neutral development that is unlikely to have adverse effects upon the integrity of the SAC. This includes a commitment to preparing additional work to identify in more detail the measures that will be required to offset phosphate inputs, in Wiltshire to be paid for by the Community Infrastructure Levy. A proposed change is recommended to the draft Plan to reflect the requirements of the MoU and ensure development proceeds in a compliant way.

Natural England

Summary of main issues raised:

Natural England objected to the draft Plan through the consultation in respect of the proposals at Trowbridge on the grounds that a mitigation strategy to protect the integrity of the Bath and Bradford on Avon Bats SAC was not in place. Again, work has been progressed in respect of this matter and constructive dialogue with Natural England has taken place. Natural England welcomed work to date on developing a mitigation strategy to ensure the qualifying features of the Bath and Bradford-on-Avon Bats SAC are appropriately protected from the pressures exerted by development through mitigation measures designed to safeguard protected bat species.

One of the issues at the heart of Natural England's objection relates to Core Policy 29 of the Core Strategy in terms of ensuring the impacts associated with further development at Trowbridge (loss of habitat and increased recreational pressure) are addressed. To this end, the Council commissioned work in July 2017 to investigate the nature of recreational pressure on large, publicly accessible open spaces including important bat habitats around the town. The findings led to a series of recommendations that are now being developed alongside measures for offsetting loss of habitat, to provide a coherent, strategic approach to safeguarding bats associated with the SAC.

Work is progressing on developing the Trowbridge Bat Mitigation Strategy in consultation with Natural England. It is anticipated that this will form part of the submission documents to support the draft Plan. It has been agreed that the Strategy will be delivered in two phases. Phase 1 Phase 2 will follow to provide a longer-term strategy to support the Local Plan Review, which plans for the period 2016 to 2036 will focus on development coming

forward within the timescale of the draft Plan, including both allocated land and windfall sites, identifying the nature of mitigation required mostly within the allocations themselves. It will collate all available evidence on bat habitats at the town and provide recommendations to satisfy the Competent Authority (the Council), in consultation with Natural England, that the proposals in the draft Plan would not put at risk the integrity of the Bath and Bradford on Avon Bats SAC. To this extent, there are proposals already set out within the draft Plan for how development intends to bolster green infrastructure and create 'dark corridors' to provide greater permeability for bats in the urban/rural landscape.

The Addendum to the HRA considers that together with the proposals included in the draft Plan to protect and buffer existing bat habitat, Phase 1 of the Trowbridge Bat Mitigation Strategy will be sufficient to ensure that adverse impacts to the SAC features will be avoided and the integrity of the SAC maintained.

The second main issue relates to the management of phosphates and is discussed in more detail above under the section relating to the Environment Agency.

The approach to considering public rights of way and open space within the draft Plan is recognised as an issue that needs to be clear and equitably represented alongside other factors. Loss of recreation amenity must be properly considered and loss of green infrastructure resulting from the proposed development should be replaced by equivalent or better provision, without an approach to address any loss Natural England considers the Plan to be unsound.

Action taken by the Council in response:

A review of the evidence has been carried out to ensure public rights of way and open space were treated equitably in the site selection process and policy requirements. The Council has ensured it has acted equitably and in accordance with national planning policy in the site selection process and proposed modifications have been suggested to policy where appropriate. Core Policy 52 of the Wiltshire Core Strategy requires the creation of replacement green infrastructure if such land is lost through development.

Further work between all partners is ongoing to develop measures to address the phosphates issues in the geographical area covered by the Hampshire Avon Nutrient Management Plan. A memorandum of understanding is being developed to show all partners are in agreement that measures are being finalised that will ensure all new development is phosphate neutral. The action taken by the Council to address the phosphates issues is discussed in more detail above under the section relating to the Environment Agency.

Work is ongoing to deliver the Trowbridge Bat Mitigation Strategy. Phase I of this work will be submitted with the Plan to satisfy the immediate HRA compliance requirements. Phase II will be prepared alongside the emerging Local Plan (Core Strategy) Review process to inform longer-term plans for housing growth at the Trowbridge and potentially other locations too (e.g. Corsham).

Network Rail

Summary of main issues raised:

Network Rail commented that developer contributions would be required to fund necessary rail infrastructure improvements and this should be a consideration in viability

testing.

Specific comments are raised in relation to proposed allocation H1.1 at Ludgershall. Network Rail requires that proposals for the site are supported by evidence to demonstrate that any increase of footfall across the existing pedestrian rail crossing would not compromise rail safety. It is recommended that the policy identifies either a need to close the crossing and divert the public right of way, or to improve the crossing - i.e. provision of a bridge.

Action taken by the Council in response:

The proposed amendment to the policy text for site allocation H1.1 would need to be discussed and agreed with the site promoter and Network Rail prior to the Examination hearings. At this stage, there is no evidence to justify a need to alter the existing rail crossing point.

Highways England

Summary of main issues raised:

Highways England comments that the Plan needs to be supported by an assessment of infrastructure necessary to ensure that traffic impacts are not severe. Highways England would be content if the identified infrastructure satisfies requirements of Para 9 of Circular 02/2013 <https://www.sabre-roads.org.uk/forum/viewtopic.php?t=31861>.

Assessment of infrastructure requirements for the Strategic Road Network is currently ongoing, led by Wiltshire Council in consultation with Highways England. It is envisaged that infrastructure requirements will have been assessed by the time of examination and Highways England will be willing to assist the Inspector to report on any residual implications for the Strategic Road Network.

The Highways Agency raise issues related to geographical areas, rather than specific sites as follows:

- Salisbury Sites – impact on A36.
- Chippenham sites - impact on M4 junction 17.

Highways England state that in Salisbury, Policy H3.1 requires ‘transport network improvements’ to be made and that the same should be the case for site allocation H3.3.

Action taken by the Council in response:

There is ongoing joint working with Highways England to understand and address these issues. Modelling work is being carried out for Trowbridge and Salisbury to provide a package of mitigation measures to support the proposed allocations in these settlements. Highways England is also reviewed reviewing their own TEMPRO modelling work. It is considered unlikely that the proposals would lead to severe impacts on Junction 17 of the M4 and it has been agreed with Highways England that the response was looking for justification of why further assessment has not been carried out, in this case it is due to the small scale of the proposed allocations in the Chippenham Community Area. An agreed position will be presented through the Examination process as a Statement of Common Ground. Appropriate proposed changes have been suggested for site allocation H3.3.

New Forest District Council

Summary of main issues raised:

New Forest District Council welcomes reference in the duty to cooperate statement to the implications of housing requirements for the parts of the wider South Wiltshire Housing Market Area that are within the New Forest National Park. There is housing need in the New Forest District area that New Forest District Council cannot accommodate. Wiltshire Council should take account of unmet housing need in these areas.

In terms of recreation impacts on the New Forest European sites, the Council recognises that the draft Plan does not propose to allocate sites in proximity to the New Forest SPA/SAC (outside the visitor catchment area) and that the Habitat Regulations Assessment concludes no likely significant effects; but identifies that consideration should be given to impacts from neighbourhood plans. .

The Core Strategy Habitats Regulations Assessment did not identify adverse effects from development on the integrity of any European sites (including the New Forest SAC) from nitrogen deposition. This conclusion remains as little or no further growth has occurred in the visitor catchment area. However, following a High Court Judgement relating to the need to assess in combination air quality impacts, the Wiltshire Habitats Regulations Assessment may need to be reconsidered.

There are potential in-combination effects related to phosphate issues that need to be addressed on a catchment-wide basis, in the catchment area of the River Avon.

Action taken by the Council:

Work will be carried out through duty to cooperate to identify and address the specific issues raised. Where appropriate, mitigation measures will be incorporated into policy to ensure the integrity of the Natura 2000 network is not adversely affected by housing development although this may be through the Local Plan review process where appropriate.

Further work between all partners is ongoing to develop measure to address the phosphates issues in the geographical area covered by the Hampshire Avon Nutrient Management Plan. A memorandum of understanding is being developed to show all partners are in agreement that measures are being finalised that will ensure all new development is phosphate neutral. The phosphates issues are discussed in more detail above under the section relating to engagement with the Environment Agency.

Consideration of cross boundary strategic issues in relation to addressing unmet housing need will fall within the ambit of the Wiltshire Local Plan Review.

Funding has now been secured through a partnership bid¹⁴ to the Planning Delivery Fund (Joint Working) to develop evidence to understand the impact of recreational pressure on the New Forest arising from new development as basis for developing an appropriate framework for mitigation. This will inform the Wiltshire Local Plan Review. In the interim, in assessing the effects of neighbourhood plan proposals on the New Forest SPA, in line with paragraph 6.77 of the Wiltshire Core Strategy, *“planning applications will be subject to individual HRAs and bespoke mitigation secured as necessary.”*

New Forest National Park Authority

¹⁴ Between Wiltshire Council, Test Valley Borough Council, New Forest National Park Authority, New Forest District Council, Southampton City Council, Eastleigh Borough Council and Natural England

Summary of main issues raised:

The New Forest National Park Authority recognises that none of the housing site allocations in this current consultation fall within the visitor catchment of the New Forest SPA and the requirements of the adopted Core Strategy (paragraph 6.77) to mitigate the impact of the plan in relation to the New Forest SPA and increased recreational pressure may not apply. The Authority would like to emphasise that Wiltshire Council isn't currently meeting its requirements in relation to other housing allocations identified within the adopted Core Strategy. As such, the impacts on the New Forest SPA are not currently being mitigated – an issue that was identified in the HRA of the Council's adopted Core Strategy some years ago.

Strategies have been in place for planning permissions granted by the National Park Authority and New Forest District Council since 2012 and 2015 respectively. It is suggested that these measures could provide a useful starting point for any discussions on the production of a mitigation strategy in line with Wiltshire Council's obligations under the habitats regulations.

Mitigation strategies have been in place for planning permissions granted by the National Park Authority and New Forest District Council since 2012 and 2015 respectively and could provide a useful starting point to any discussions on the production of a mitigation strategy in line with Wiltshire Council's obligations under the habitats regulations.

Action taken by the Council:

The proposed allocations do not fall within the visitor catchment of the New Forest SPA and therefore mitigation is not needed. Notwithstanding this, as paragraph 6.77 of the Wiltshire Core Strategy recognises prior to a New Forest Mitigation Strategy being developed, "*planning applications will be subject to individual HRAs and bespoke mitigation secured as necessary.*" This is the approach being implemented by the Council.

Funding has now been secured through a partnership bid¹⁵ to the Planning Delivery Fund (Joint Working) to develop evidence to understand the impact of recreational pressure on the New Forest arising from new development as basis for developing an appropriate framework for mitigation. This will inform the review of the Wiltshire Core Strategy.

Bath and North East Somerset Council

Bath and North East Somerset have no comments to make on the Plan.

Gloucestershire County Council

Gloucestershire County Council acknowledges sites in Oaksey and Crudwell are near the Gloucestershire boarder and they agree with the SA and HRA finding.

Hampshire County Council

Hampshire County Council draws attention to the importance of safeguarding two minerals and waste sites (Brickworth Quarry and Pound Bottom Landfill) on the Wiltshire/Hampshire border.

North Dorset District Council

North Dorset District Council has no objection to the draft Plan as there are no strategic impacts on North Dorset District. The expansion of Shaftesbury into Wiltshire is identified

¹⁵ Between Wiltshire Council, Test Valley Borough Council, New Forest National Park Authority, New Forest District Council, Southampton City Council, Eastleigh Borough Council and Natural England

as a strategic issue in the duty to cooperate statement. However, this is an option to pursue through the review of the Wiltshire Core Strategy rather than this plan.

Test Valley Borough Council

Test Valley Borough Council support the draft Plan and would like to continue working on cross boundary on housing, transport and infrastructure issues that may arise from future development.

In regard to proposed site allocation H1.1 land at Empress Way, Ludgershall Test Valley Borough Council welcome the requirement for screening to the southern and eastern boundaries of the site which will protect middle and long-distance views from Test Valley.

Appendix 2: Liaison with neighbouring authorities since July 2017

An email was sent to all neighbouring authorities during the consultation on the draft Housing Site Allocations Plan to invite neighbouring authorities to meet if relevant (email sent 28th July 2017).

Table 2: Evidence showing how duty to cooperate has been implemented with neighbouring authorities since July 2017

Strategic Issue	Stakeholder	Why engaged	How engaged	When engaged	Key outcomes
Potential for housing development for Shaftesbury in Dorset on land adjoining the town but within Wiltshire County administrative area.	Dorset Councils Partnership	To discuss development at Shaftesbury.	Meeting	31 st August 2017	The potential to identify land adjoining Shaftesbury but within Wiltshire Council's administrative area is outside the ambit of the Wiltshire Housing Site Allocations Plan and will be addressed through the Local Plan Review process. Ongoing engagement on this matter will relate to the Councils' respective Local Plan reviews.
Potential for housing development in Wiltshire to meet unmet needs in the New Forest.	New Forest District Council and New Forest National Park Authority	To discuss unmet housing need in the New Forest and approaches to habitat mitigation	Meeting	18 th July 2017	Potentially identifying land within Wiltshire to meet needs in the New Forest administrative area is outside the context of the Wiltshire Housing Site Allocations Plan and will be addressed through the review of the Local Plan (2016 to 2036). Ongoing engagement on this matter will relate to the authorities' respective Local Plan reviews.
Cross boundary issues.	Bath and North East Somerset Council (BANES)	A wider meeting to discuss cross boundary	Meeting	20 th September 2017	BANES confirmed they had no comments on the draft Plan.

		issues			
Cross boundary issues.	Swindon Borough Council	As part of joint working arrangements to address cross boundary strategic issues ,focused on preparation of Joint Spatial Framework and aligned Local Plan Reviews.	Meetings/ engagement	Regular meetings	Ongoing joint working arrangements generally focused on the aligned Local Plan reviews (2016 to 2036). No issues have arisen related to the Housing Site Allocations Plan as there are no current cross boundary issues directly related to it.

Appendix 3: Liaison with prescribed bodies since July 2017

An email was sent to all prescribed bodies during the consultation on the draft Housing Site Allocations Plan to invite neighbouring authorities to meet if relevant (email sent 28th July 2017).

Table 3: Evidence showing how duty to cooperate has been implemented with prescribed bodies since July 2017

Strategic Issue	Stakeholder	Why engaged	How engaged	When engaged	Key outcomes
To ensure special regard has been given to the consideration of heritage assets	Historic England	To ensure that great weight has been given to heritage in the site selection process.	Ongoing meetings and correspondence	30 th August 2017	It was agreed that Wiltshire Council would commission consultants to carry out a heritage impact assessment for identified sensitive sites to ensure that great weight has been given to relevant heritage assets. This work has been carried out and proposed changes have been suggested accordingly. The Schedule of Proposed Changes can be found in Appendix R of the Regulation 22 (1) (c).
To ensure special regard has been given to the consideration of heritage assets	Historic England	To ensure that great weight has been given to heritage in the site selection process.	Meeting	1 st March 2018	Review of commissioned heritage impact assessment and how the Council could respond to the findings. In essence, Historic England advised the Council to explore all options and arrive at a position on how it wishes to proceed to the risks presented in heritage terms to developing the proposed site allocations. The Schedule of proposed Changes can be found in Appendix R of the Regulation 22 (1) (c).
Ensuring that open space and public rights of way (PROW) have	Natural England	To address issues related to the treatment of PROW and	Meetings and correspondence	20 th September 2017 23 rd February 2018	It was agreed that a review would be carried out of site allocations to ensure the Council has taken a consistent approach to public rights of way, open space and recreation use, and to ensure any

<p>been treated equitably throughout the site selection process and the draft Plan</p>		<p>open space.</p>			<p>opportunities for protecting open space and making sustainable links are made.</p> <p>A review of the site selection process for each area has been carried out and open space and public rights of way have been treated equitably across all sites. A review has also been carried out to ensure that requirements for open space and public rights of way are consistent across allocations in policy and the supporting text. The Schedule of proposed Changes can be found in Appendix R of the Regulation 22 (1) (c).</p>
<p>Impact on integrity of Bradford and Bath Bats SAC</p>	<p>Natural England</p>	<p>Ongoing joint working to ensure that the Bechstein's bats and Bradford and Bath SAC is sufficiently protected.</p>	<p>Meetings and correspondence</p>	<p>20th September 2017 23rd February 2018</p>	<p>To consider the scope and development of the Trowbridge Bat Mitigation Strategy; building on the work commissioned to consider the nature of recreational pressure on publicly accessible open space including important bat habitats at the town. Phase I of the Mitigation Strategy will focus on development coming forward through the timescale within the draft Plan (including allocations and windfall development), with Phase II focusing on longer term growth to support the review of the Wiltshire Core Strategy. Phase I would satisfy the immediate Habitats Directive compliance requirements.</p> <p>It was agreed in the meeting to reword the title of the study from 'Trowbridge Recreation Management Mitigation Strategy' to 'Trowbridge Recreation Management and Bat Mitigation Strategy'</p>

					<p>and this change has been proposed to the Plan. Natural England has informed the content of the strategy.</p> <p>It was also agreed that the site boundary of proposed allocation H2.4 has been amended to follow the river and enable land to be included for bat mitigation.</p> <p>The Schedule of proposed Changes can be found in Appendix R of the Regulation 22 (1) (c).</p>
Ongoing joint working to address impacts on the strategic road network.	Highways England	Ongoing joint working to address impact on the A36	Meetings and correspondence	Bi-monthly meeting	<p>Work has been carried out to develop the Trowbridge and Salisbury Transport Strategies including agreement of timetables and cumulative impact on the A36.</p> <p>Highways England noted that draft policy H3.1 required “transport network improvements necessary to accommodate the scale of development envisaged” but site allocation H3.3 did not. A change is proposed to ensure that the phrase is also included for draft policy H3.3.</p> <p>The Schedule of proposed Changes can be found in Appendix R of the Regulation 22 (1) (c).</p>
Ongoing joint working to address impacts on the strategic road network.	Highways England	Impact on junction 17 of the M4 by the following allocations: Hullavington	Meetings and email	26 th February 2018	<p>Following further discussion at the meeting Highways England confirmed that they did not object to the proposed development at Hullavington, Yatton Keynall and Crudwell. It was confirmed in and email from Highway England (received 26th February 2018) that</p>

		(50 dwellings), Yatton Keynell (30 dwellings), and Crudwell (50 dwellings)			the intention of the advice relating to impact on Junction 17 of the M4 was to suggest it should be made clear why no further assessment has been carried out for these sites on potential impact on the SRN, as opposed to necessarily requiring further assessment to be carried out.
Ensuring that future development helps address and manage phosphate levels in the River Avon, its tributaries and surrounding catchment area.	Natural England, Environment Agency, Wessex Water, Christchurch Borough Council, New Forest District Council, New Forest National Park Authority	Ongoing joint working to manage and address the phosphates levels in the River Avon catchment area.	Ongoing meetings and correspondence	20 th September 2017 14 th November 2017 17 th January 2018 23 rd February 2018 14 th March 2018 20 th April 2018 (meeting on the 20 th April was between the Environment Agency and Wiltshire Council) All partners may not have been present at all meetings but notes and outcomes were shared and agreed.	Work is ongoing with partners to sustain the effectiveness of the Nutrient Management Plan and address phosphates issues in the River Avon SAC. Constructive progress is being made on a Memorandum of Understanding that will be agreed prior to Submission.

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Department for
Communities and
Local Government

Simon Ridley
Chief Executive
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BS1 6PN

Dear Simon,

Local Plans

Each local planning authority should produce a Local Plan for its area, and in doing so should proactively engage a wide section of the community so that Local Plans, as far as possible, reflect a collective vision for areas. The Government accords great importance to authorities getting up-to-date Local Plans in place and to supporting them in doing so as a priority.

We have recently seen significant positive plan-making progress: 82% of authorities have now published Local Plans and 64% adopted Plans compared with 32% and 17% in May 2010 respectively. It is imperative that this positive progress is maintained, and the Government is open to taking further measures to achieve this if needed.

As inevitably a plan cannot exactly account for future circumstances there is a real value in getting a Local Plan in place at the soonest opportunity, even if it has some shortcomings which are not critical to the whole plan. We have acknowledged this in planning guidance by setting out that Local Plans may be found sound conditional upon a review in whole or in part within five years of adoption.

The Planning Inspectorate plays an important role in examining plans impartially and publicly to ensure that they are legally compliant and sound, and many inspectors have already demonstrated commendable pragmatism and flexibility at examination to enable councils to get plans in place. I have, however, seen recent examples where councils are being advised to withdraw plans without being given the option to undertake further work to address shortcomings identified at examination.

In order to maintain plan-making progress and to recognise the cost and time to a council prior to submitting a plan, it is critical that inspectors approach examination from the perspective of working pragmatically with councils towards achieving a sound Local Plan. We will shortly make a Ministerial Statement on this issue, including the importance of inspectors

highlighting significant issues to councils very early on, and of giving councils full opportunity to address issues.

I will also clarify how early review may be used as a way of ensuring that a Local Plan is not unnecessarily delayed by seeking to resolve matters which are not critical to the plan's soundness or legal compliance as a whole. In this context I would highlight a recent note published by the Planning Advisory Service which highlights where a commitment to early review has featured in recently adopted Local Plans (http://www.pas.gov.uk/web/pas1/local-planning/-/journal_content/56/332612/7399006/ARTICLE.)

Please can you ensure that inspectors are aware of the Government's position, and that you update your procedural guidance and support to inspectors so that all Local Plan examinations take full account of this letter.

THE RT HON GREG CLARK MP

Wiltshire Council

Cabinet

15 May 2018

Subject: Exemption Request – Extra Care Housing and Housing Related Support

Cabinet member: Jerry Wickham - Adult Care, Public Health and Public Protection

Key Decision: Yes

Executive Summary

This paper requests approval to award the following contracts, under an exemption to the incumbent providers, Mears Care, Somerset Care at Home, Salisbury City Almshouse, Knightstone, Habinteg Housing, Stonewater Housing:

- **Extra Care Housing (ECH):** care and support contracts for 4 existing ECH schemes
- **Housing Related Support (HRS):** 8 contracts for sheltered housing schemes across Wiltshire (currently covered by the Help to Live at Home (HTLAH) providers)
- **Housing Related Support (HRS):** 4 additional schemes with individual agreements (outside of HTLAH)

This paper also requests that Cabinet delegates authority to the Corporate Director with responsibility for Adult Care to approve:

- a) Award of contracts within the approved budget

As part of the Adult Social Care Transformation programme the Council is changing the way it commissions domiciliary care. Notice has been given on the current HTLAH block contracts with a new type of contract being tendered in May 2018.

The HTLAH block contracts also cover the following service provisions:

- Care and Support for 4 Extra Care Housing Schemes
- Housing Related Support

In addition 4 other providers provide Housing Related Support and there is the opportunity to integrate this support into the existing service provision.

ECH and HRS services are distinct from domiciliary care services and there is potential to reshape them to provide better outcomes for customers and better value for the Council. This will need to be undertaken as a separate piece of

work to the domiciliary care tender. The work may take between 12-18 months and will include customer consultation, review of ECH and HRS models of support, and the development and tender of new service specifications.

It is important that during this time current services are maintained to give customers consistent support.

The ECH schemes are located in Devizes (Needham House and Crammer Court), Pewsey (Meadow Court) and Westbury (Bell Orchard).

The HRS services cover the whole of Wiltshire.

This request is being sought to exempt these contracts from the Public Contract Regulations (2015) and apply the direct award of contracts without an open tender competition for the reasons set out herein.

Proposal(s)

To award the following contracts, under an exemption, to the incumbent providers, Mears Care, Somerset Care at Home, Salisbury City Almshouse, Knightstone, Habinteg Housing, Stonewater Housing:

- Extra Care Housing: care and support contracts for 4 existing ECH schemes
- Housing Related Support:: 8 contracts for sheltered housing schemes across Wiltshire (covered by the Help to Live at Home (HTLAH) providers)
- Housing Related Support: 4 additional schemes with individual agreements (outside of HTLAH)

To delegate authority to the Corporate Director with responsibility for Adult Care to approve the award of contracts within the approved budget

Reason for Proposals

As part of the Adult Social Care Transformation programme the Council is changing the way it commissions domiciliary care. Notice has been given on the current HTLAH block contracts with a new type of contract being tendered in May 2018.

The HTLAH block contracts also cover the following service provisions:

- Care and Support for 4 Extra Care Housing Schemes
- Housing Related Support

These services are distinct from the domiciliary care services and there is potential to reshape them to provide better outcomes for customers and better value for the Council. This will need to be undertaken as a separate piece of work to the domiciliary care tender and it is important that during this time the current service is maintained to give customers consistent support.

Dr Carlton Brand, Corporate Director

Wiltshire Council

Cabinet

15 May 2018

Subject: Exemption Request – Extra Care Housing and Housing Related Support

Cabinet member: Jerry Wickham - Adult Care, Public Health and Public Protection

Key Decision: Yes

Purpose of Report

1. This paper requests approval to award the following contracts, under an exemption, to the incumbent providers, Mears Care, Somerset Care at Home, Salisbury City Almshouse, Knightstone, Habinteg Housing, Stonewater Housing:

- Extra Care Housing: care and support contracts for 4 existing ECH schemes
- Housing Related Support: 8 contracts for sheltered housing schemes across Wiltshire (covered by the Help to Live at Home (HTLAH) providers)
- Housing Related Support: 4 additional schemes with individual agreements (outside of HTLAH)

1.1 This paper also requests that Cabinet delegates authority to the Corporate Director with responsibility for Adult Care to approve:

A) Award of contracts within the approved budget

Relevance to the Council's Business Plan

2. The Council needs to ensure that there is sufficient and suitable 24hr care provision for those living in the 4 existing ECH schemes and that those eligible for Housing Related Support can maintain their accommodation/tenancies.

- Protect the most vulnerable in our communities

Background

3. HTLAH providers currently provide the following services in addition to block domiciliary care provision:

Extra Care Housing

ECH Scheme	Location	Units	Service	Annual Spend
Crammer Court	Devizes	50	24hr emergency response, activities & housing related support	£69,021
Needham House	Devizes	47	24hr emergency response, activities & housing related support	£29,479
Meadow Court	Pewsey	25	24hr emergency response, activities & housing related support	£72,720
Bell Orchard	Westbury	12	Overnight emergency response, activities & housing related support	£41,735
Total				£212,955

Housing Related Support

Provider	Area Covered	Units	Forecast spend 2018/19
Mears	Across the county	1,540	£604,568
Somerset Care	West and North	899	£410,656
Total			£1,015,224

- 3.1 The following providers also provide housing related support and these volumes could be included in any future tender for this service:

Provider	Area Covered	Units	Annual Spend
Stonewater	Trowbridge	30	£19,711
Knightstone	Trowbridge	16	£8,000
Habinteg	Wilton	26	£15,352
Salisbury Alms Houses	Salisbury	191	£37,399
Total			£80,462

- 3.2 There are a number of pieces of work which need to be completed in relation to the above ECH and HRS schemes before the Council considers tendering for a new provider(s):
- Customer consultation in relation to the type and level of services they would like to be provided at these schemes
 - Review of care and funding models to ensure that the schemes provide a service which is appropriate and affordable for both the customer and the Council
 - Develop a specification for each service and commissioning intentions for delivering the service
- 3.3 This work is likely to take 12-18 months and to ensure that there is service continuity during this time contracts will need to be awarded to ensure current arrangements are maintained in the intervening period.
- 3.4 Sheltered Housing– housing related support
- 3.5 Work began in 2016 to review the services being provided within the schemes with a view to creating an equitable service across the county that met the needs of the tenants at an affordable price. This work was temporarily halted in 2017 as it was brought into the Adult Social Care Transformation Programme (Phase 2).
- 3.6 The majority of these housing related support services are currently provided by Mears and Somerset Care, under the HTLAH contract. The Transformation Programme Phase 1 determined that all current HTLAH contracts would end from September 2018, to allow for the design of a new HTLAH domiciliary care service. However, ending current contracts also includes ending the service to the tenants within their schemes from September 2018.
- 3.7 We have an opportunity now to recommence this review, including consulting with tenants about the type of service we can offer and whether this meets their needs and expectations. However, this work will take longer to achieve than September 2018, in order to ensure that all residents are consulted with and the specification for future services is co-produced with people who use services and potential providers.
- 3.8 We also have an opportunity to integrate into these contracts the 4 schemes currently outside of the HTLAH contracts as set out in the table in para 3.1 above.

Main considerations for the Council

4. ECH and HRS services need to be reshaped to improve outcomes for the customer and the Council and whilst this piece of work is undertaken it will be important to maintain the existing services 'as is' to provide continuity for the customer and certainty for the Council in relation to the service provided and spend.

Overview & Scrutiny Engagement

5. A verbal report on this issue was presented to Health Select Committee on 24th April 2018.

Safeguarding Implications

6. It is important that adults who are vulnerable due to the nature of their physical or mental health condition have the support they need to promote their health and wellbeing and maintain their accommodation arrangements.

Public Health Implications

7. The availability of extra care services and housing related support will ensure that the health and wellbeing of those in need can be maximised within a community setting.

Procurement Implications

8. This request is an extraordinary exemption, as outlined in Part 10, Procurement & Contract Rules, Section C 14. The value of the contracts necessitates a key decision for award by Cabinet.
- 8.1 There is insufficient time to reshape the services and go to market before the existing HTLAH contracts come to an end and to achieve continuity of service the services of the existing providers need to be retained.

Equalities Impact of the Proposal

9. The procurement of 24hr care within ECH and HRS would support equitable access to support services for people who wish to remain living in the community and who do not have the financial means to secure this care themselves.
- 9.1 The specifications for the services states that providers will be expected to demonstrate use of local resources and provision of services which take account of customer's religion and culture.
- 9.2 The procurement process ensures that organisations entering into a contract with the Council must have their own policies and procedures in place to comply with the Equality Act 2010.

Environmental and Climate Change Considerations

10. By ensuring a level of choice of extra care provision across Wiltshire and supporting people to stay in their existing homes through housing related support this will reduce the level of travel and associated costs for families and will help to ensure that Wiltshire residents can remain living in their local community area.

Risk Assessment

11. Risks are limited and restricted to market challenge however the proposal is compliant with Procurement and Contract rules.

Risks that may arise if the proposed decision and related work is not taken

12. There is insufficient time to consult stakeholders and create specifications for the new services before the end of the current contracts. In the absence of a contract award customers will be without an appropriate interim service and would be placed at risk because of this.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

13. Awarding contracts under an Exemption rather than a full tender process carries some risk of challenge from the market however the relatively short term nature of the contracts and likelihood of change in service may make this less likely.

Financial Implications

14. The total cost of these proposals is £1,308,641 and is fully funded from within the current approved Adult Social Care budgetary envelope.

Scheme	Total
Extra Care Housing	£212,955
Housing Related Support	£1,095,686
Total	£1,308,641

- 14.1 It is anticipated that the new service models will achieve savings and as the work on consultation and specifying requirements continues, options appraisals for a range of savings will be developed and evaluated.

Legal Implications

15. Failure to properly comply with relevant parts of the Constitution, the Public Contract Regulations and the general principles of contract law could result in a legal challenge. However the risk of challenge will be minimised by the use of a PCR compliant procurement process as overseen by the Strategic Procurement Hub.

- 15.1 An exemption is being sought under the Category of Exemption from the Procurement & Contract Rules, Section C 16.3.7 Reasons of Compatibility.

Options Considered

16. The following options have been considered but are not suitable:
- Do nothing – services cannot be provided in the absence of a contract and the current contracts end in September 2018

- Tender exercise using existing specification prior to September 2018 – this would not be a good use of resources given that the intention is to reshape the services within a relatively short time period and the length of contract during an interim period may be unattractive to new providers
- Tender exercise using new specification prior to September 2018 – there is insufficient time to consult with customers, create a new specification and complete a tender process by September 2018.

Evelyn Wheeler - Interim Director Commissioning

Report Author: Kath Norton - Community Commissioner
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Background Papers

The following documents have been relied on in the preparation of this report:
None