

**From:** [REDACTED]  
**To:** [Spatial Planning Policy](#)  
**Subject:** Winterslow Settlement boundary \*Printed\*  
**Date:** 09 June 2018 10:20:01

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I am writing to raise an objection to the proposed revised Settlement Boundary adjacent to 1, Witt Road, Winterslow, Salisbury, SP5 1PL. This revision has been instigated by Kent Oak Ltd in order to build a small housing estate on a rural lane on a plot which currently sits outside the present boundary. This revision is not supported by Winterslow Parish Council who recently reviewed the boundaries during the drafting of the Neighbourhood Plan

I'm objecting as the revision is being proposed by the landowner and their developers and not by the Parish Council who represent Winterslow village through the NP consultative process

Regards

[REDACTED]

From: [REDACTED]  
To: [Spatial Planning Policy](#)  
Subject: WINTERSLOW: Development Proposal Outside Village Boundary \*Printed\*  
Date: 10 June 2018 09:29:54

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Dear Sir/Madam,

I write to express my very serious concern regarding a proposed development adjacent to 1 Witt Road, Winterslow, Salisbury, SP5 1PL.

My objection is on the grounds that this proposal falls outside the village boundary. Allowing a development outside the village boundary would I believe act as the setting of a very serious precedent and could have significant repercussions on many other village communities.

Specifically I would like to draw your attention to the Wiltshire Core Strategy Plan that states:


*"At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites **within** the settlement boundaries. ... ..Development outside the settlement boundary will be strictly controlled. Relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan, which includes a review of the settlement boundary to identify new developable land to help meet the housing and employment needs of that community."*

I do not believe that this development proposal meets the criteria and should therefore be refused.

Yours faithfully

[REDACTED]

[REDACTED]

From:   
To: [Spatial Planning Policy](#)  
Subject: WINTERSLOW: Development Proposal Outside Village Boundary \*Printed\*  
Date: 10 June 2018 13:38:59

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Dear Sir/Madam,

I write to express my very serious concern regarding a proposed development adjacent to 1 Witt Road, Winterslow, Salisbury, SP5 1PL.

My objection is on the grounds that this proposal falls outside the village boundary. Allowing a development outside the village boundary would I believe act as the setting of a very serious precedent and could have significant repercussions on many other village communities.

Specifically I would like to draw your attention to the Wiltshire Core Strategy Plan that states:

*"At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites **within** the settlement boundaries. ... ..Development outside the settlement boundary will be strictly controlled. Relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan, which includes a review of the settlement boundary to identify new developable land to help meet the housing and employment needs of that community."*

I do not believe that this development proposal meets the criteria and should therefore be refused.

As an adjunct to this, Witt Rd is a single track width road and we already suffer from frequent hold ups due to deliver and builders lorries. This proposed development can certainly be classed as "over development"

Yours faithfully



**From:** [REDACTED]  
**To:** [Spatial Planning Policy](#)  
**Subject:** The Red Line, Witt Road, The Common, Winterslow, SP5 1PL \*Printed\*  
**Date:** 10 June 2018 21:30:54

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Dear Sirs

I write to object to all the land adjacent to number 1 Witt Road being included in the revised housing boundary together with any other boundary changes in Witt Road. I believe that neither the Neighbourhood Planning Steering Group nor the Parish Council have asked for these changes. I further understand that the Neighbourhood Planning Steering Group are on record as saying they will be retaining the boundary as it previously existed in Witt Road. I am a resident of Witt Road and do not wish the boundary to be altered.

Yours faithfully

Sent from Samsung tablet.

**From:** [REDACTED]  
**To:** [Spatial Planning Policy](#)  
**Subject:** Objection to changing Settlement boundary in Witt Road \*Printed\*  
**Date:** 10 June 2018 23:09:57  
**Attachments:** [South HMA Southern Wiltshire CA - Winterslow A3L.pdf](#)

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Hi

It has been brought to our attention that there has been a proposal to change the Settlement boundary in Witt Road around 1 Witt Road and around Juniper in Witt Road as detailed in the attached pdf.

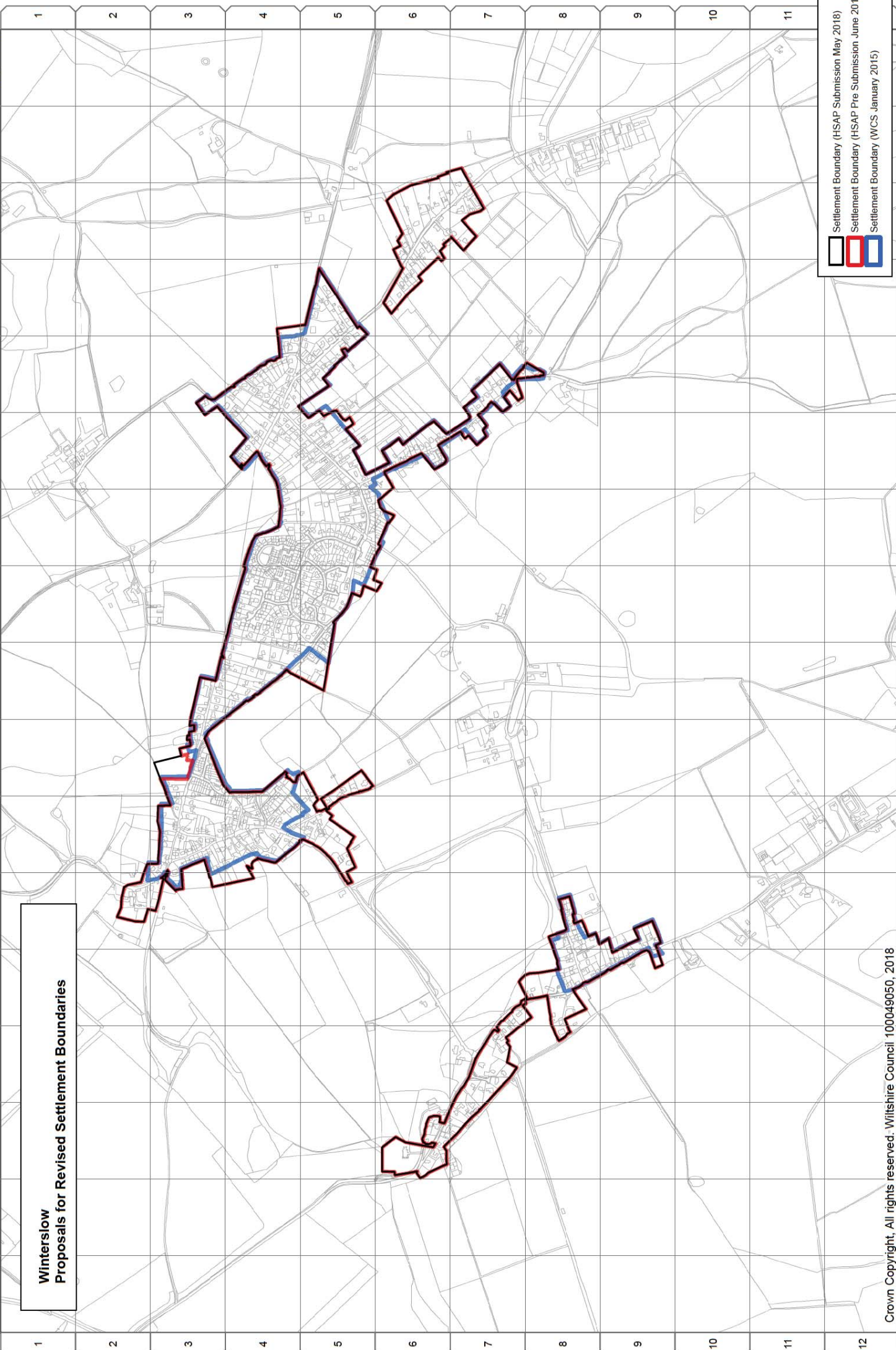
We would like to register an objection to this as Witt Road is a single track road and is unable to sustain any further access, especially at the start of Witt Road where visibility is poor.

Also the road is susceptible to flooding and further development would increase the risk of flooding towards the end of the road.

Thanks

[REDACTED]

**Winterslow  
Proposals for Revised Settlement Boundaries**



Legend for Settlement Boundaries:

- Black line: Settlement Boundary (HSAP Submission May 2018)
- Red line: Settlement Boundary (HSAP Pre Submission June 2017)
- Blue line: Settlement Boundary (WCS January 2015)

**From:** [REDACTED]  
**To:** [REDACTED] [Spatial Planning Policy; Devine, Christopher](#)  
**Subject:** Proposals for revised settlement boundaries \*Printed\*  
**Date:** 11 June 2018 08:49:22

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**URGENT ACTION REQUIRED.**

Dear spatial planning team,

I write reference a proposed amendment to the Winterslow boundary red line for development. I am off the understanding that this is at its final stages, I wish to make an objection to this in particular the change to the boundary at the start of Witt Road. Amendment to this will only benefit the landowner and the developers seeking to develop this site. There will be no benefit for the local community, vitality of the village and local community will not be improved one little bit. Winterslow has an abundance of homes for sale, and there is currently no requirement at this agricultural site, Winterslow has a neighbourhood plan which has preferred sites. There are already an abundance of potential sites that can provide Winterslow housing needs now and in the future.

As a resident of this road where any future development will severely impact my day to day life, why was I not made aware of this possible change by either council body? It is only by neighbourhood conversation and some research that I find this information. We chose to live in this road partly due to the settlement boundary red line restrictions.

I am curious to know how this site came about as a potential change to the plan as it is an exceptionally narrow single track and congested road, surely better sites and more appropriate ones exist?

Please can you confirm this email and my objection, and I request to be kept informed of next steps reference and proposed boundary change.

Regards

[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [Spatial Planning Policy](#)  
**Subject:** Settlement boundrey Winterslow \*Printed\*  
**Date:** 11 June 2018 09:00:25

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I wise to object to the change to the settlement boundary relating to land adjacent to 1 Witt road. Winterslow sp5 IPL.

The land in question is not part of the residential domestic garden relating to 1 Witt road, it is under separate ownership and it is agricultural land. I believe that this proposed settlement boundary is driven entirely by developers in order to build houses in an inappropriate location.

Yours faithfully

[REDACTED]

[REDACTED]



**From:** [REDACTED]  
**To:** [Spatial Planning Policy](#)  
**Subject:** Proposed Housing Boundary change in Witt Rd, Winterslow Proposal for Revised Settlement Boundary (Ref L6) \*Printed HC\*  
**Date:** 11 June 2018 10:56:51  
**Attachments:** [South HMA Southern Wiltshire CA - Winterslow A3L.pdf](#)

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To Whom It May Concern,

It was recently brought to my attention that there is a proposal to move the Housing Boundary in Witt Rd Winterslow (attached). I wish to strongly object to the Boundary being moved to include land adjacent to No.1 Witt Road and request that the line remains as defined in the WCS 2015 Map (this leaves the house, 1 Witt Road, inside the housing boundary but none of the surrounding agricultural land/open space).

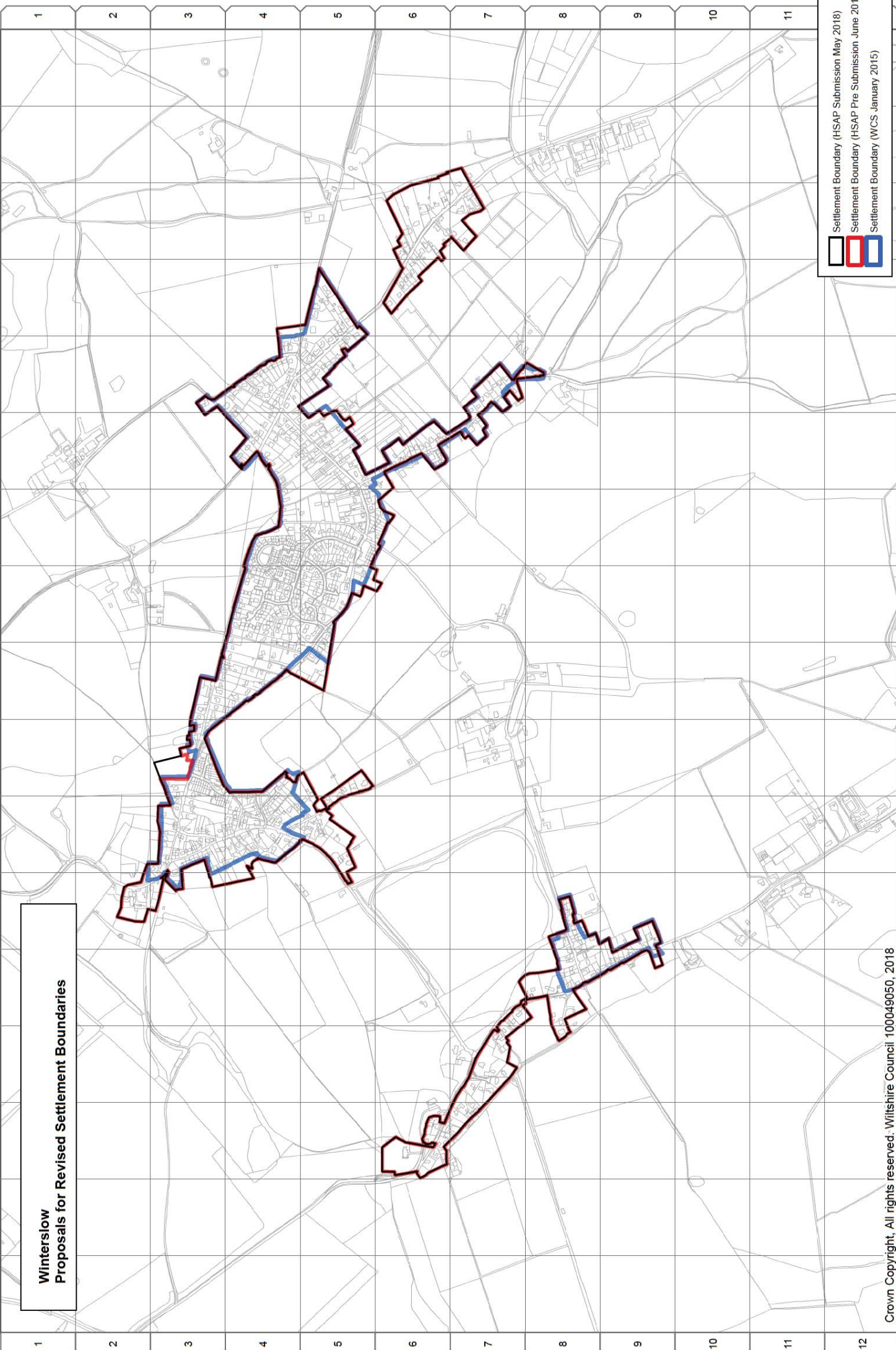
Instigated by Winterslow NP Steering Group, the village voted on which plots of land it wished to see developed. All the land adjacent to No.1 Witt Rd was put forward by the owners but it was rejected by popular vote. A small estate and other small developments have recently been completed within the village, however these have been completed transparently and in line with the agreed Neighbourhood plan. This proposed boundary movement is not.

I believe the changing of the above boundary in Witt Rd will be unconstitutional and should not be ratified by Wiltshire Council.

Kind regards,

[REDACTED]  
[REDACTED]  
[REDACTED]

**Winterslow  
Proposals for Revised Settlement Boundaries**



Legend for Settlement Boundaries:

- Settlement Boundary (HSAP Submission May 2018) - Black line
- Settlement Boundary (HSAP Pre Submission June 2017) - Red line
- Settlement Boundary (WCS January 2015) - Blue line

From: [REDACTED]  
To: [Spatial Planning Policy](#)  
Subject: Objection to Proposed Boundary Change \*Printed HC\*  
Date: 11 June 2018 10:59:07

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Dear Sir/Madam,

Proposed Housing Boundary change in Witt Rd – Ref: Winterslow Proposal for Revised Settlement Boundary (L6)

It was recently brought to my attention that there is a proposal to move the Housing Boundary in Witt Rd Winterslow. **I wish to strongly object to the Boundary being moved to include land adjacent to No.1 Witt Road and request that the line remains as defined in the WCS 2015 Map** (this leaves the house, 1 Witt Road, inside the housing boundary but NONE of the surrounding agricultural land/open space).

Supporting Reasons:

1. The local residents have not requested this change.
2. Winterslow Parish Council has not requested this change.
3. Winterslow Neighbourhood Planning Group has not requested this change.
4. In addition I have it in writing from Winterslow NP 18mths ago that **“the NP Steering Group will be retaining the boundary as it is shown”** the map they enclosed clearly showed the above mentioned land OUTSIDE the Housing Boundary.
5. Instigated by Winterslow NP Steering Group, the village voted on which plots of land it wished to see developed. All the land adjacent to No.1 Witt Rd was put forward by the owners but it was rejected by popular vote, probably because of its location in a small single track rural road and because of the substantial distance from amenities in Winterslow (it is over a mile from school, shop and pub).
6. Documentation on the Wiltshire Council Website shows that it is the Agents for the land that have applied for this change, and also further boundary changes on this site.
7. In addition, Agents for the land have already applied for outline planning permission, suggesting the land is already available for development (even whilst the land is outside the Building Boundary and not supported within the NP)
8. No. 1 Witt Road and its surrounding land

used to constitute a small holding. Over recent years the owners have, without permission, taken in land and enclosed the barns within a hedge so as to make it appear that the house has a large garden. Recently the house was sold off with just a small strip of land immediately behind it. **The remained of the land behind the hedge is what the owner/devlopers are seeking to have included in the new Housing Boundary and have already applied to build on it.** This is contrary to a number Wiltshire Councils objectives, specifically item 2 in the Introduction and para 53 of the NPPF and the statements made in section 7.20, Conclusion, WWSA Topic Paper 2018.

<!--[if !supportLists]-->9. <!--[endif]-->There is high demand in the village for small plots of land for rural use but sadly owners will not sell or rent if they believe there is the remotest chance of future planning permission being granted, as is demonstrated in this case.

I and most villagers are not against development, a village has to evolve but it must be done openly and within the Neighbourhood Plan. We have just completed the building of a small estate and other small developments, which were agreed by our Neighbourhood plan. In addition and we are told by our Parish Council that we have met our current Government requirements for housing in Winterslow and we still have further developments in our plan agreed by the village.

For all the above reasons, I believe the changing of the above boundary in Witt Rd will be unconstitutional and should NOT be ratified by Wiltshire Council.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

From: [REDACTED]  
To: [Spatial Planning Policy](#)  
Subject: Proposed Housing Boundary change in Witt Rd, Winterslow Proposal for Revised Settlement Boundary (Ref L6) \*Printed HC\*  
Date: 11 June 2018 11:10:16  
Attachments: [South HMA Southern Wiltshire CA - Winterslow A3L.pdf](#)

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To Whom It May Concern,

I have been notified there is a fundamental change to the red line Housing Boundary in Witt Rd Winterslow (attached). As a home owner on this road; I wish to **strongly** object to the boundary being moved to include land adjacent to No.1 Witt Road and request that the line remains as defined in the WCS 2015 Map (this leaves the house, 1 Witt Road, inside the housing boundary but none of the surrounding agricultural land/open space). I fear the alterations and subsequent approval, will set a precedence not only in Witt Road, which will lead to others requesting inclusion and further planning permission, but also in the rest of the village.

Whilst I do not object to planning consent, or housing development, the village voted on which plots of land it wished to see developed. All the land adjacent to No.1 Witt Rd was put forward by the owners but it was rejected by popular vote. A small estate and other small developments have recently been completed within the village, however these have been completed transparently and in line with the agreed Neighbourhood plan. This proposed boundary movement is not. Furthermore, this land has been used many years for agricultural purposes and I understand the owners of 1 Witt Road tried to purchase the land for such purposes and were denied. Leading me to believe the current owners are merely interested in the process of making money and have not considered the voice of the village in their proposals to develop outside of this plan.

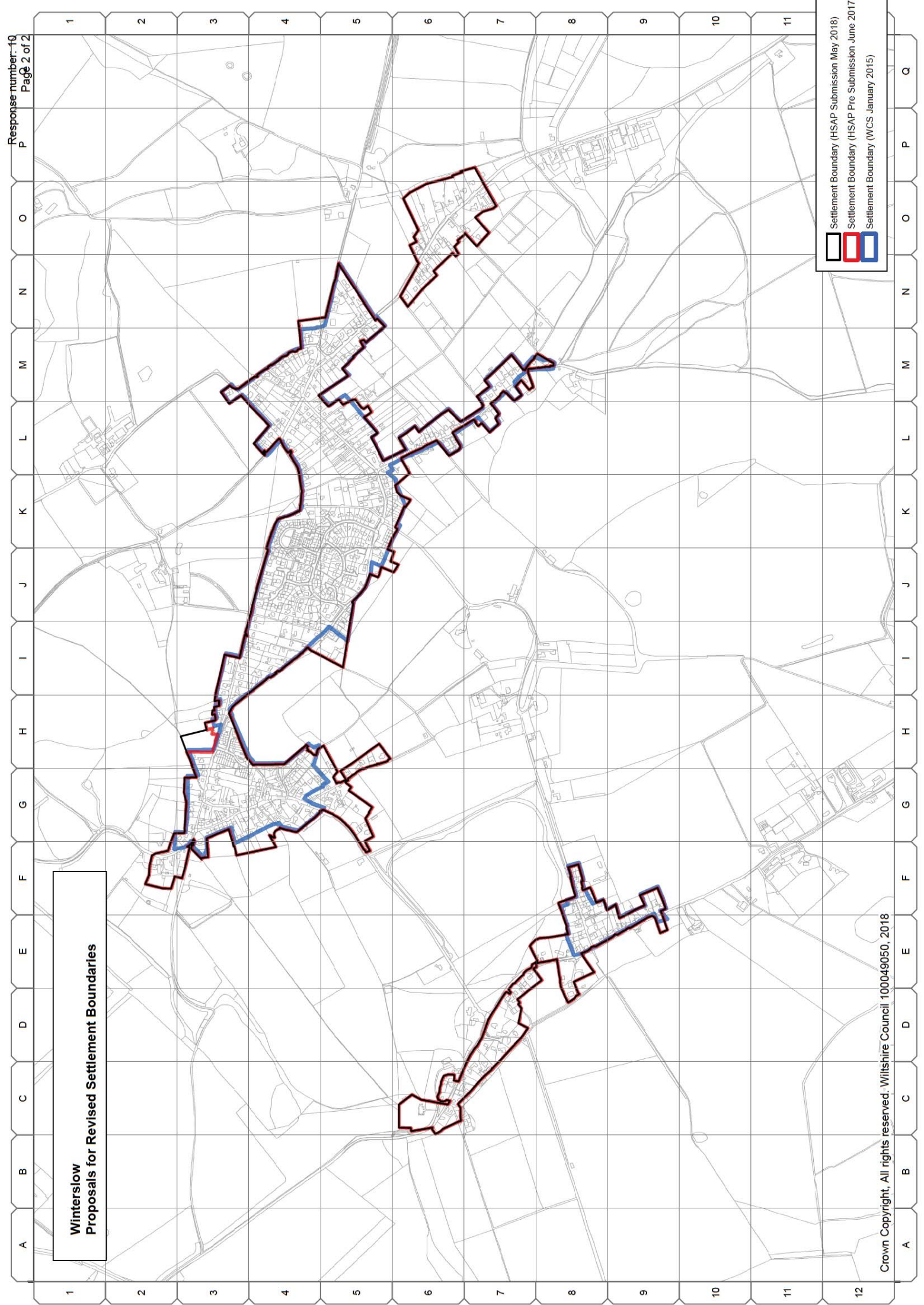
I believe the changing of the above boundary in Witt Rd will be unconstitutional and should not be ratified by Wiltshire Council.

Kind regards,

Ashley Bird

[REDACTED]

[REDACTED]



**Winterslow  
Proposals for Revised Settlement Boundaries**

Legend:

- Settlement Boundary (HSAP Submission May 2018)
- Settlement Boundary (HSAP Pre Submission June 2017)
- Settlement Boundary (WCS January 2015)

From: [REDACTED]  
To: [Spatial Planning Policy](#)  
Cc: [REDACTED]  
Subject: RE: Consultation on draft Wiltshire Housing Site Allocation Plan - SHLAA Site 3408 \*LL to GW\* \*Printed\*  
Date: 18 May 2018 17:40:10  
Attachments: [image001.png](#)  
[image002.png](#)

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Dear Sir/Madam,

I note that the post consultation Wiltshire Housing Site Allocations Plan has now been submitted to councillors for approval (see minutes of meetings 15.05.2108) and the decision was deferred until the July meeting. There may therefore be a further opportunity for correcting errors in the documents submitted as supporting papers.

I further note with respect to SHLAA site 3408, Beechwood, Middleton, Winterslow, SP5 1RD, that the proposed settlement boundary is still shown as arbitrarily going across the middle of the established lawn, rather than respecting the actual residential curtilage/garden boundary. The actual boundaries of the residential curtilage are clearly represented to the north by the road; to the east by a line of trees separating SHLAA site 3408 from the neighbouring residential property; to the south by an evergreen hedge from agricultural land; and to the west by established woodland. The line shown on the current plan is not related to any existing physical feature and even appears to cross through the middle of an existing outbuilding, which has been present for at least 20 years and is clearly visible on aerial photographs, etc.

I have already pointed this out as a probable error during the consultation period, and subsequently (see below). I note that in similar cases elsewhere, the red line settlement boundary **has** been amended to relate to the existing boundaries of residential curtilages visible as physical features of the built environment, in accordance with the current 'Wiltshire Council Topic Paper 1: Settlement Boundary Review Methodology Paper'. If this error is not going to be corrected, then I would appreciate an explanation of why this has NOT been done.

As shown at grid reference G5 on the current 'Southern Wiltshire CATP May 2018 FINAL document, the actual position of the red line would be impossible to determine; the line scales out at around 20m wide on the plan and does not relate to any visible landmarks whatsoever. The following table A.7 provides justification for amendments to grid reference G5 (amongst others) as 'amend boundary to include built residential and community facility development physically related to the settlement', but this has not been done on the map. The entirety of SHLAA Site 3408 up to the current site boundaries has been in residential use since the 1960s, and as such, is obviously related to the existing settlement.

I appreciate that your team has been very busy with a huge number of consultation responses, but an early response would nevertheless be much appreciated, particularly as I

have only been trying to point out what seems to be a simple error. Or if it is not an error, then there should be an equally simple explanation for why the Council has chosen to define the settlement boundary in this way.

Many thanks

[Redacted]

Sent from [Mail](#) for Windows 10

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**From:** [Spatial Planning Policy](#)  
**Sent:** 15 January 2018 11:01  
**To:** [Redacted]  
**Subject:** FW: Consultation on draft Wiltshire Housing Site Allocation Plan - SHLAA Site 3408

Dear Dr Flindell,

Thank you for your email.

I can confirm that we have received your original email and that it is being treated as a response to the consultation. We are still in the process of reviewing consultation responses and preparing the formal submission to the Secretary of State, therefore no final decision has yet been taken on further changes to the settlement boundaries in advance of submission.

If you require any further information, please do not hesitate to contact us.

Kind regards,

[Redacted]

**Economic Development and Planning**  
Wiltshire Council | County Hall | Trowbridge | Wiltshire | BA14 8JN  
Telephone: 01225 713223  
[Redacted]  
Website: [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)

Follow Wiltshire Council



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**From:** [Redacted]  
**Sent:** 10 January 2018 12:58



**To:** Spatial Planning Policy  
**Cc:** [REDACTED]  
**Subject:** RE: Consultation on draft Wiltshire Housing Site Allocation Plan - SHLAA Site 3408

Dear Sir,

Please could you confirm that the error on the original plan of the revised settlement boundaries in Winterslow (see below) has now been corrected in the formal submission to the Secretary of State.

I note that the correct plan of the boundary of site 3408, Beechwood, Middleton, Winterslow has now been included as an attachment on the consultation portal (see file: shela-2017-appendix-5.14-southern-wiltshire.pdf; attached), and that my note from 4-09-2017 pointing out the error has been included on the consultation website as a formal comment, (see file: site 3408 04-09-2017.docx; attached), but I have not (yet) been advised whether the error has been corrected in the formal submission to the Secretary of State, or at least provided with an explanation, as previously requested.

I would be grateful to receive acknowledgement of receipt of this email and attachment and a proper response to my enquiry as previously requested in my email of 4<sup>th</sup> September 2017, as copied below for your reference. I should perhaps point out that my submission to the consultation was not really a comment on any of the principles of the draft plan as such, but instead it was intended to point out an error in drafting the site boundaries, which had been drawn across the middle of the site for unknown reasons rather than around the actual site boundary.

Many thanks

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from [Mail](#) for Windows 10

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**From:** [REDACTED]  
**Sent:** 04 September 2017 19:56  
**To:** [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk)  
**Cc:** [REDACTED]  
**Subject:** Consultation on draft Wiltshire Housing Site Allocation Plan - SHLAA Site 3408

Dear Sir,

I wish to point out what appears to be an error on the plan of revised settlement boundaries in Winterslow included as Figure A.76 of the draft consultation documents.

I attach my detailed explanation of why I believe this to be an error.

I would be grateful to receive acknowledgment of receipt of this email and attachment, and in due course, confirmation that this error has been corrected in the submission to the Secretary of State, or alternatively, if there is some reason for what appears to be an arbitrary division across the middle of the site, then I would be grateful for an explanation.

Many thanks

[REDACTED]

Sent from [Mail](#) for Windows 10

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**From:** [REDACTED]  
**To:** [Spatial Planning Policy](#)  
**Subject:** HDPD and Briefing Note 355 \*LL to VH\* \*Printed\*  
**Date:** 31 May 2018 16:04:13  
**Attachments:** [Housing DPD amend comments.docx](#)

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As advised in Briefing Note 355, I am sending you comments on your original report to Cabinet and the amended Housing Development Plan that was presented to the meeting. These are my personal comments.

Principally, it is my contention that the draft plan is not “sound” and I submit a number of reasons why I believe this is so.

I also have some comments on specific amended sections. In this case I have included the report sections to which I refer.

I ask the Council to take note of my views.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Comments on

## **Wiltshire Council**

### **Cabinet**

**15 May 2018**

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

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

Item 1 - p40

#### **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;**

The draft Plan is not sound for the following reasons.

**Item 2** - The Housing Plan is perhaps one of the most important policies to be made by the Council and so should be a document understood and decided upon by the whole of the Council, not just by Cabinet. It is unbelievable that the report states:-

“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.”

**Item 3** - The Plan does not take sufficient account of the “Consultation” which was intended to be a major step in developing the Plan. The report to Cabinet is 395 pages long. Comments were received from almost 1000 people and organisations. The section on the results of consultation amounts to 8 pages. Considerable weight is given to comments from developers, ecological and heritage aspects. Almost nothing is reported about comments from Town and Parish councils and members of the public.

**Item 4** - There is no mention in the plan about the character of Wiltshire that the community wishes to see. We may achieve the housing content but will our descendants wish to live in the environment left to them? Somewhere in the documentation there should be a discussion about site density, ie homes per hectare. Clearly there will be a range of densities. A block of flats would be expected to be denser than a rural site. Members should have a say in this. If it is available, it is not obvious.

The site density in many cases has increased by up to 65% (PC43) with minimal explanation.

I can find no discussion about the density of population in Community Areas; no discussion about the percentage of undeveloped land within Community Areas that should be left undeveloped to provide an interesting and attractive environment. One might expect that both of these measures would help to assess the future quality of Wiltshire. One should expect an environment designed on the principles of the Garden Cities.

Item 5 - Wiltshire Council are quite rightly having to allow for the Bechstein and other bats to thrive. However, the hedgehog appears to have been forgotten. Hedgehog habitats include private gardens. Many existing houses have gardens large enough to allow some space to be unkempt and provide for hedgehogs. With a very high density development, with little or no gardens, separated by solid fences, there will be minimal opportunities offered for hedgehog movement through them. In 2015 it was reported that four surveys were carried out in urban areas. The results showed a worrying decline. Hedgehog support organisations have also detected a fall in numbers of 30% in urban areas and 50% in rural areas since 2000. Hedgehogs are a protected species. The ecological aspects of the housing proposals should explain how hedgehogs will be safeguarded.

Item 6 - One of the biggest problems facing the country is handling the extension in life expectancy. Accommodation for the elderly should be a significant part of this report. It is seriously lacking.

Item 7 - In the case of several sites around Trowbridge, development is proposed in direct contradiction of the Core Strategy policy to keep open space between Trowbridge and its surrounding villages.

Item 8 - The increase in numbers on many sites is so large that the proposals should go out again for consultation.

## Amendments to Housing DPD

### COMMENTS

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

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

	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 <del>44.32</del> 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	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.  Amend first bullet point of Policy H2.1 to read: Amend 4th bullet point of Policy 2.1 to read:  <ul style="list-style-type: none"> <li>"A <b>significantly improved and</b> consolidated public open space area <del>incorporating and augmenting</del> <b>adjacent to</b> the existing Queen Elizabeth II Field <b>to provide a play area and junior level sports pitches for local community teams to utilise</b>."</li> </ul>	Main

Elm Grove Farm

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"> <li>• " New cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site, <b><u>and the White Horse Business Park.</u></b>"</li> </ul>	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:  <b><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></b> .	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 <b><u>and, where appropriate, its setting.</u></b> 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 <del>through a Heritage Impact Assessment.</del> <b><u>by detailed assessments (including heritage) to support any subsequent planning application."</u></b>	Minor

Page 258

## Comments

- 1 PC33 and 34 are such extensive changes that this site should go out again for consultation.
- 2 From the point of view of North Bradley residents a woodland buffer should be planted against the A363 to mask the side of Matalan in the Spitfire Retail Park.

Land off A363 at White Horse Business Park

Housing Allocation H2.2 Land off the A363 at White Horse Business Park, Trowbridge						
Page 259	PC38	Figure 5.6 Paragraph 5.52	ID: 1114350 Rep: 18 -  ID: 1115490 / 1115452 Rep: 21  ID: 1120664 / 1115452 Rep: 131  ID: 1125881 Rep: 723 ID: 403859 Rep: 1457  ID: 1130978 / 1130975 Rep: 1832	Factual update.  Amend site boundary to reflect land ownership and also to exclude site that has now been developed.	Amend the boundary of the allocation as set out in Annex C;  And first sentence of paragraph 5.52 to read:  "Approximately <del>25.62</del> <b>18.96</b> ha of land off the A363 south-west of the White Horse Business park is allocated for the development ...."	Minor
	PC39	Policy H2, Table 5.3; Paragraph 5.52	ID: 8090227 / 1132859 Rep: 3074  ID: 1137984 / 1130975 Rep: 3142-	Improve clarity.  To maximise efficient use of land consistent with heritage and ecological constraints increase the number of dwellings to approximately 225 units.	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.  And amend first sentence of paragraph 5.52 as follows:  "...land off the A363 south-west of the White Horse Business park is allocated for the development of approximately <del>460</del> <b>225</b> dwellings, as identified on the Policies Map."	Main

Page 260	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:  <b><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></b>	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. <b><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></b> "	Minor



### 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.

#### Comments

- 1 PC39 is such an extensive increase in numbers that it should go out again to consultation.
- 2 Discussions should take place with North Bradley Parish Council to reach a compromise that will allow the North Bradley Neighbourhood Plan to proceed with its ambition to leave a green landscape gap between North Bradley village and the WHBP.
- 3 The redevelopment of the ex-Virgin car park (brown site) should be promoted to replace the use of the fields (green site). Flats could be considered with a high density to match the proposed change of use from office to residential.
- 4 The parish Council clearly knows the area well, possibly better than the officers and consultants who only make site visits. The Parish Council's expertise should be used.
- 5 Para 3.3 should be explained in terms of a plan, rather than just words.

## Ecology

- 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

## Comments

1 The Plan is clearly premature. It is anticipating a suitable Mitigation Strategy but this presumably will be subject to consultation and a suitable result is not ensured. For example, the effects of the plan on the hedgehog population in the Wiltshire Council area has not been considered.

## Heritage

### 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.

## Comments

1 Whether the proposals are considered less than substantial depends on the viewpoint. To an authority anxious to boost housing numbers "less than substantial" is satisfactory. However, local residents might well argue that the effect will be very substantial. Surely it is the viewpoint of the local resident who lives with the situation day after day rather than the consultant who might spend an hour or less on site which should take precedent.?

## Comments

Road Conditions

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:  <b><u>"Developments will be required to address any direct or indirect cumulative impacts on the A36."</u></b>	Minor
PC54	Paragraph	ID: 706891	In response to comments from	Amend paragraph 5.87 as follows:	Minor

Comments

1 Highways England has commented that there could be a cumulative impact of traffic increase on A36. There does not appear to be any similar comment from the Highways section of Wiltshire Council on the effects of traffic generated by Elm Park Farm and the A363 WHBP development on A363 and other roads in the Trowbridge network. Is the Council not interested in potential worsening of congestion along Bradley Road?

**From:** [REDACTED]  
**To:** [Spatial Planning Policy](#)  
**Subject:** The Farmyard on the draft Wiltshire housing allocation list at Laverstock and Ford Salisbury \*Printed\*  
**Date:** 08 June 2018 08:10:04

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Dear Sir or Madam,

I am writing in connection with this proposed development over which consultation ends on June 11<sup>th</sup> 2018.

I wish to object most strongly to the possibility that this planned development should have any access or egress onto Roman Road (Ford Lane).

The clue is in the name of the road from Old Sarum through Ford. I suspect the most recent development of Roman Road took place just before the last Romans left to return to Italy. It is a rural lane already heavily used and abused by modern traffic with traffic volume and speeding through Ford now at almost critical level. The lane has several accesses already and has very narrow areas, poor forward visibility, sharp bends and humpback bridges amongst other features unsuited for even existing traffic volumes. With the future prospect of access to this lane from wished for development on the Old Sarum airfield this narrow rural lane is really quite unsuited for a large volume of modern traffic as all traffic has to funnel through the hamlet of Ford. Ford Lane is much used by pedestrians, horse traffic and cyclists for which physically it is most suited. Because of its narrowness and parlous conditions with much of the road edges destroyed with abundant potholes, the route really cannot be upgraded for heavier traffic. Already in times of problems on the A30 and A345 the lane is heavily used as a relief route in times of stress. If this development is approved, all its ramifications should be contained in the already heavily developed Bishopdown Farm and particularly Neal Close where access to this housing is best afforded.

I should be most grateful if this objection could be recorded.

Yours faithfully,

[REDACTED]

## Wiltshire Cabinet Meeting 15<sup>th</sup> May 2018.

### Agenda Item 7. Wiltshire Housing Site Allocation.

My name is [REDACTED]. I am, with three other family members, the freeholder of SHLAA site 3268 known as: Land, The Spring, Market Lavington within housing papers.

I am attending this morning's meeting to specifically answer the Wiltshire Conclusion that this land is inappropriate for small scale residential development. I heard about the Cabinet meeting on Saturday afternoon; I apologise in advance for a hastily made submission.

Within the Wiltshire Housing Site Allocation Plan, Sustainability Appraisal Report the land at P 363 is regarded as More Sustainable with other sites over Wiltshire but is excluded from the Assessment of Policies at P 365 which has a note at the head of the schedule saying that certain sites have been chosen from the schedule above it.

I have to explain that, as a policy of complete support in our Neighbourhood Plan Committee and our Parish Council, we have chosen to offer our field to this plan and have only been in touch with Wiltshire to answer questions when they have arisen from within public documents. If an approach to the County would be welcome I would like to provide further and better information from existing sources and demonstrate sustainability benefit in relation to our land.

In submitting this land to the village for inclusion within the Neighbourhood Plan we have made it clear that we want to provide old peoples' dwellings as to part of the development objects, ideally as Affordable Homes; this village is a working community therefore containing middle aged and elderly inhabitants, many of whom are not well off.

Our land is the nearest to the retail centre of the village of all the sites that have reached the later stages of the selection process yet geographically the best by far in having unimpeded road links from the parish. Development of the site will cause virtually no additional congestion on The High Street; unlike other sites proposed it is within walking distance.

Our site only extends to 1 Hectare and meets the public desire for the Neighbourhood Plan to provide housing in small sites rather than to permit Fiddington to enlarge by perhaps 40% which large size does not settle well in a rural setting where access to modern recreation opportunities and integration into the small community are both difficult.

I have to answer the Wiltshire Conclusion summary in regard to three matters;

1. Site storm water drainage. I have with me a copy of the letter prepared by Cole Easdon, our hydrological consultants, provided in September 2017 to Wiltshire in response to the request for submissions on last year's housing document which demonstrates completely that the perceived 'surface water flooding' is so easily

dealt with that it just is not a major issue. In addition the natural falls can readily be returned as of right to completely remove any ponding in the field caused by a modern embankment which carries a school road at the Western end.

2. This site substantially lies below the level of the B3098 public highway by virtue of the clay abstraction from the land a couple of centuries ago and so buildings upon it would be, rather surprisingly, unobtrusive. Furthermore the wood and wild strip along the Southern boundary screens the land from the scarp of Salisbury Plain. The land quality is poor due to previous disturbance, the area does not contribute to the surroundings owing to its contouring yet provides the opportunity for a very discreet residential scheme.
3. Our absolute commitment to the village is that most people will be pleased with the work we do. The nature of the position encourages ready integration with the historic environment. Our site is not on the far edge of the developed land with other post war build; we understand that we should use our responsibility to enhance our rural village.

 14<sup>th</sup> May 2018.

## A response to the Consideration of Wiltshire Housing Site Allocations Development Plan Presented to Cabinet on 15<sup>th</sup> May 2018.

### SHLAA Site 3268 The Long Field, The Spring, Market Lavington.

I was asked by Cllr T.Sturgis on the 15 May at Cabinet to amplify my remarks for the Spatial Planning Team who are seeing [REDACTED] and myself, [REDACTED] with [REDACTED] the MD of Feltham Properties on the 20<sup>th</sup> June. We are very grateful for the offer of discussion and too for the help received in arranging the meeting.

For purposes of recap and convenience I attach to this response to the Plan which is to be with Wiltshire council on the 11<sup>th</sup> June a record of my remarks on the 15<sup>th</sup> May. I also have used a Wiltshire plan for purposes of easy plot identification; the SHLAA numbers are two paragraphs down.

I have to ask forgiveness for the length of this submission however I have two worries to overcome which really can only be achieved by detailed reference to the Housing Site Allocation Plan.

Arising from the Devizes Community Area Remainder Sustainability report at P 4657 SHLAA 3268 reached equal assessment standing with other alternative development proposals at Market Lavington. This land became an Omission Site and has been further assessed under Stage 4a Site Landscape Assessment. I have not seen the equivalent assessments which have no doubt been completed for SHLAA 1089, 2055, 530, 3443 which are other Market Lavington locations.

#### PART ONE

In first presenting this land to the village of Market Lavington for proposed development we envisaged a slightly quirky proposal which was amended but which very much holds to the policy of providing homes which complement our two very large estates at Fiddington, mainly built for the MoD in the 1960's and Grove Farm built in the 1980's/90's

Since 1949 the population increase has been from 950 people to some 2,250 today. This remarkable growth at a rural parish has been welcome for a great number of reasons not least the sustainability of services in the village and the employment provided.

This expansion should continue because we provide a marginally different way of life to urban living but it has to be created in as friendly way as possible so that new residents reach out and use those things that this particular community has to offer. This paragraph can be tendered in relation to any group of dwellings but we are a Rural Centre where the outlook from the community needs to be extrovert, Can Do and accommodating. I am absolutely sure that is what Market Lavington and also Wiltshire Council are aiming for.



A plan Showing the built area of Market Lavington parish. SHLAA sites are coloured Yellow.

The B 3098 runs nearly due West from the cross roads at the village centre and SHLAA 3268 fronts onto the road on the South side.

Wiltshire Council: Wiltshire Housing Site Allocations Plan: Sustainability Appraisal Report

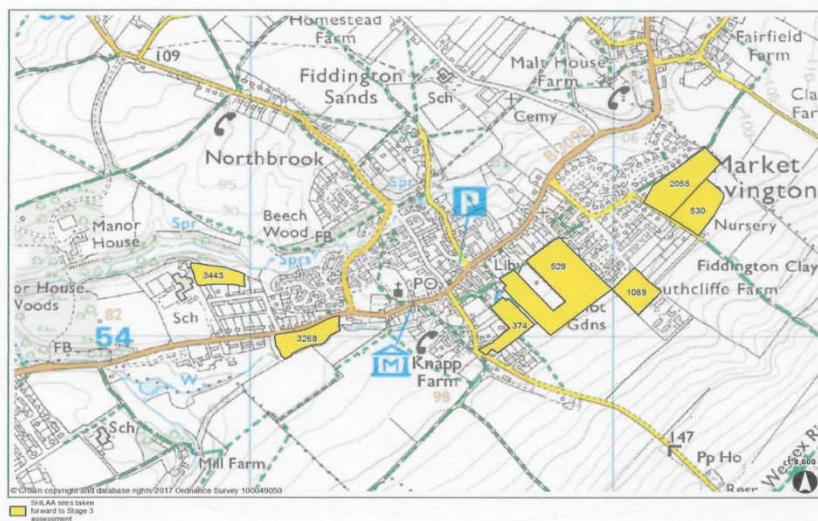


Figure 7.8. Market Lavington

I am sorry but the choices made under the Allocations Plan have no regard to this aspect of Town & Country Planning and make a horrible mistake in seeking to extend onto the foot slopes of The Plain an estate which was first conceived to house families who had a traditional lifestyle linked to a military profession which did not need integration with the local community. Adding to the estate at a modern density two more developments is bad for existing occupiers because the 'urban' boundaries grow and is worse for new people popped between cereal cropping and deeply established housing estate living

There are so many reasons why placing new housing behind existing single use development would normally be considered bad policy that I will not elaborate save to remind about 19<sup>th</sup> C. development in the wool and cotton towns or 20<sup>th</sup> C. housing in London as T & C P policy struggled into existence.

The Grove Farm estate is far more successful because its' position belongs with the village and there are naturally good road and footpath communications running through it.

The Market Lavington people understand all this which, I expect, is why they asked for small development sites yet the Allocation Plan ignores this intention choosing an alternative to that in the Neighbourhood Plan documentation.

The guidelines used in the preparation of the Housing Allocation Plan take a very valid component of Planning expertise and use it beyond its appropriate place within the way that the environment should be evaluated.

Planning is about land and Planning is about people; not just the residents of newly created homes but also, metaphorically, the people who live next door already. Present Planning thinking puts extraordinary weight on the technical suitability of land for its change of use – you understand – view from footpaths nature of the sub-soil, colour of the bricks, shelter belts, density, nature matters; the land must pass these tests before its suitability for human occupation is considered; even worse if the land meets the technical standards, well yes, humans will be safe and happy. Everyone understands the cost of this regulation, targets led process, is mental and physical health problems, social insecurity.

I have explained above why Wiltshire and Market Lavington have not quite seen eye to eye on the future of the parish. The centre needs to be stronger, for example improved parking, before a distant estate expansion is encouraged.

I have always thought the Southcliffe scheme is sensible because of the land use to the South but by my own argument the site should be rejected as contributing little to the village but just helping to meet County housing requirement alone.

Our land lying immediately adjacent to the 19<sup>th</sup> C. built community is overlooked by the modern Community Hall, St Mary's Church with the Old School (a PCC owned facility). Even the Surgery at the other end of the village is less than 1 Km away, the shops and The Green

Dragon, serving food, are 500 m distant. Time and again one hears how fortunate one is to live in Market Lavington.

## PART TWO

I have to say that The Wiltshire Housing Site Allocations Plan has not incorporated to the proper extent at all the People side of Planning. There is lengthy reference to factors which are relevant but the application to SHLAA sites I have not seen.

I would be grateful please if you would look at the Wiltshire Site Allocation Plan presentation page 6601 Stage 4a Site Landscape Assessment by Wiltshire Council and The Environment Partnership.

It is unfortunate that the outside firm chosen to make this Landscape Assessment for inclusion within the Allocation Plan have a conflict of interest as I am advised, not over the whole of the County but at Market Lavington, because The Environment Partnership have Persimmon as their clients as well as Wiltshire Council. In a sector where the choice of expert is limited and where there are a multitude of interests a clash is inevitable somewhere; the interest just has to be notified in the relevant document at the point where the conflict occurs. To conceal the conflict is a serious duplicity and unworthy of the organisation.

Discovering this matter as I finished preparing this submission I have looked again at their work and better understand.

I find now that I have to make detailed remarks on the Stage 4a Site Landscape Assessment Paper. This is an entirely different aspect of the Town and Country Planners brief requiring a balanced judgement with the duties of Planning work outlined above. In this instance the investigation is deliberately limited to look at the interaction at present between SHLAA 3268 and both the countryside and the built environment alone. The study seeks to measure and report but in the end is based on an entirely empirical opinion on a slippery set of features.

I refer to the schedule in this Advice at P10. I seek to answer and comment on the report's findings. I must advise that it would be best to read my comments please with the questions and answers printed in the Allocations Plan.

## Element

### Key features of landscape character area

Market Lavington is at the extreme Western end of the Pewsey Vale and the village is dominated by the scarp of Salisbury Plain, there is no valley at Market Lavington.

The vale is a very high quality farming area. The Avon rising at Rushall, properly in the Vale, runs to Salisbury but our brook resulting mainly from the flow from the Salisbury Plain aquifer is part of the Avon catchment to Bristol.

### Site Description

This land lies relatively wet all year because the natural drainage was badly damaged when the causeway, carrying the access road to Lavington School playing field lying directly South of the Western end of SHLAA 3268, was made 40 years ago. The stream and the drain inverts were installed at the wrong levels. I have rights to rectify when required.

The surface of this paddock was taken a couple of centuries ago for its clay mostly at the Western end of the field. Top soil depth is minimal. Housing referred to as adjacent is on and above the North side of the B3098 comprising one late 20<sup>th</sup> C, house and six of pre-war construction. There are two cottages at the roundabout. To the immediate South of the land at the Western end is the School playing field and to the South East, next to the playing field is a single large arable field, the Rec used to be there. The bungalows fronting onto the B 3098 are about 20 meters from the site.

The strip of trees and less good scrub on the South side of the stream belongs with the field the whole extending to 1.1 Ha; we intend that management of the scrub and woodland for natural benefit will devolve onto the land owners jointly in the fullness of time when development is complete. Expert guidance has already been initiated and Planning direction will be desirable.

### Landscape Character

#### 'Attractiveness'

The land cannot be said to be 'attractive'; it is burdened with rushes and presently lies cold and wet because of the clay abstraction and because of the height of drainage inverts.

### Consistency

The land is entirely inconsistent with either the build environment on three sides or with the Chalk based arable land on the South side of the riparian strip. The reasons are above.

### Settlement Edge

'Some features' are said to contribute to the present settlement setting. The only one I would subscribe to is the woodland strip which will be an important aspect of any built development.

### Remoteness

I doubt if house frontagers onto the B 3098 would regard the road as 'peaceful'. I believe that there are traffic count results for the centre of the village. How can a location with a well used highway on one side, an access road and playing field to the West and South and more housing with the Community hall to the East be regarded as peaceful? Seclusion perhaps.

### Evaluation

The houses fronting onto the South side of the B 3098 do not 'nestle behind mature riparian vegetation' this is simply wrong. The unfortunately dominant Shires Close group are on made up higher ground arising from the earlier garage land use which was single storey. No other buildings are near riparian growth.

The B 3098 (The Spring) Northern frontage from the Market Lavington Sign is either developed as school space or is in residential use to the roundabout under the Community Hall. On the South side, the frontage is completely developed save for the subject site which occupies about 1/3<sup>rd</sup> of the total length.

This land has been spoiled in the past and cannot be regarded as making a quality contribution to the street scene or to the land running up to The Ridgeway. It is not peaceful meaning calm or tranquil because of the adjacent human influences.

### Views

#### Visual Prominence

The land is low lying and inconspicuous.

#### Mitigation

Riparian vegetation is not characteristic of the local landscape. The only length that exists in the parish is within this ownership and the strip South of Shires Close. There is huge potential for Mitigation by the use of high quality design, the care of the stream and the deep, sympathetic management of trees and scrub with complementary planting. I would expect and hope that this important site adjacent the village centre should be regarded as a

21<sup>st</sup> C. contribution to the village scene just as the pre-war 20<sup>th</sup> C. development does opposite.

Could I bring to your attention our own development at 25 The Spring as one way to minimise the influence of development on surroundings.

### Impact Assessment

#### Overall magnitude

Because of the land levels, the linear nature of the site and the natural background on the South side, the built area can be so easily be broken up, actually at no great loss of density or interference with surroundings. There is a fall of 3 m East to West from 81 m max AOD to 78 m min AOD.

#### Description of Impacts

This area is entirely at odds with all the various degrees of land use in the vicinity.

The benefit of the scheme will add greatly to the built environment. The whole team are committed to this within the special context of Market Lavington. There can be no assumption that completed residential housing will be other than of good architectural worth and a pleasing aspect of the village.

From where are views adversely affected? The field cannot be seen from the south; parts are glimpsed at from near the church and a small area is visible from The Community Hall.

This land benefits from a pavement along its length to protect pedestrians within the village from traffic. This village facility is the best place from which to look at the field and there is bus stop.

#### Private Views

The developed land is likely to be seen from the housing opposite along the north frontage of The Spring B 3098 but of course these forceful pre-war buildings stand above road and field levels as indeed do the well elevated units at The Ham.

There might be thought to be a special standard relating to small scale development such as ours and alternatively day to day applications. My own single storey extension at 25 The Spring received permission notwithstanding adverse comment from two owners North of The Spring opposite whereas the report regards the supposed detriment to views to house opposite the land as 'highly adverse' where they are higher and further from the site.

There are no views from the Shires Close development save via a severely oblique angle at the South eaves of the property adjacent the site; the other houses have a North/South

aspect, gardens are screened. Trees within the relevant end garden have just been lopped so that the aspect from the upper floor Westwards will minimally overlook the proposed development of which the owners are aware. The assessment is badly inaccurate.

Regarding the effect on the frontage development West of the site I do of course as indicated above have personal knowledge of this single building and its East facing gable window. If ever there was a remark that causes worry as to the guidance of the person responsible for the work, this is it. The description of 'Medium Adverse' is not well judged.

The reference to property at The Ham, one of the roads forming part of the Grove Farm estate, to the effect that a view is now a rural view to be spoiled is wrong because houses on the same Northern side of The Spring are seen in the foreground from the two houses and the view, I would judge from highway access only, extends to Salisbury Plain over our ground. Housing will be seen mid distance.

#### Mitigation and capacity to accept change.

I have to say that this summary is a wrongly judged assessment of the site partly because of Clay extraction workings on the land but also because of the setting within the village. I am sceptical of the ability of the report authors to balance the value of a view before and after development very especially when the site lies below all the surrounding land. The loss of open, wet grass and rushes is an unfortunate mistake; this is rough, ugly grazing not land I am sorry to say that will fatten lamb. It is no advertisement for the Pewsey Vale.

Most developers abandon sites so that their contribution to the surroundings is no more than an eyesore. I could have done likewise and what a glorious mess would have resulted in a couple of years.



10<sup>th</sup> June 2018.

Mrs G. Clappitt - Dix  
 Head of Spatial Planning,  
 Economic Development and  
 Planning.

County Hall,  
 Trowbridge,  
 Wiltshire, BA14 8JN.

By hand



7th June 2018.

Dear Madam,

re: Wiltshire Draft Housing Site Allocations Plan and  
 threat to Elm Grove Field off Wiltshire Drive, Trowbridge

1. I recently returned from holiday to see a report in the Wiltshire Times, of 18th May 2018, relating to claims that the Council had ignored hundreds of residents' responses to the Draft Plan in a report to a Cabinet Meeting held on 15th May, relating to the Draft Plan as it would affect Trowbridge. I understand that as a result a decision by the Council on the Draft Plan was deferred until a meeting in July for Council members to be given more time to assimilate the content of the 8000 pages of the report referring to those many responses, but summed up with three bullet points.
2. I assume the summary of the responses presented was undertaken by your department, because I was informed last October that the public responses to the Draft Plan would be compiled under various headings within your department in order to present a summary of the various issues to the Wiltshire Council. Last October I made a complaint to you about the way my response letter of 29th August 2017 was published on the internet in my name, because my hand written letter was typed up by your department, but split up under your own headings, not the headings I had used, and in a completely different order. The letter started in the middle of a paragraph, which was extracted from the middle of my letter. It ended up as a



jumble of headings in no particular order with a mish mash of information about the various sites jumbled up, with no logical start or end to paragraphs, because of your insistence in presenting it under your headings, for your own internal convenience to summarise the objections in a particular way.

3. I accept that on my complaint you agreed to remove the typed version you had published on the internet without my consent, regarding the way it was shown in its altered format, and agreed to substitute a re-typed copy of my letter in its original format as set out by me, (allowing me to check the re-typed version before it was published on the internet). I stated in writing at the time that if that had not been done the logic of my arguments relating to the split up facts in my original letter would have been lost to the "Planning Officers offering advice to the Council on their deliberations for the Site Allocations Plan, by the dissection of those arguments and the information appertaining to them". I also stated that the same point would apply to the Government appointed Planning Inspector.
4. Your verbal response to that when we spoke on the telephone was that Planning Officers are well versed in dealing with letters which are re-presented in an amended format to help your internal consideration of responses by different people to planning applications. You appeared to be suggesting that Planning Officers are effectively super human, because they can make sense of a response reduced to gobbledygook, as mine was, by the separation of arguments from the original headings and separation from the facts and appropriate subject matter (which may be several pages away), under your own different headings and in a

completely different order within a letter, in my case consisting of 18 pages of A4!

5. That argument is ridiculous, and as I wrote at the time, "does not say much for the likely outcome and accuracy of your deliberations for the consideration of Wiltshire Council", in my letter of complaint of 10th October 2017. It appears that is precisely what has happened, namely all the details of respondent's comments, and the logic of their arguments have been conveniently "lost" in translation to your internal machinations by splitting up responses for your own ends. This is clearly very convenient as a method of defence of your original recommendations to the Wiltshire Council under the Draft Allocations Plan. You and your department wrote the Draft Plan and clearly you do not want it altered by the public. This demonstrates a disgracefully cavalier attitude by your department to the public consultations over this Draft Site Allocation Plan.
6. To make matters worse in the same Wiltshire Times of 18th May there was a report headed "School may go on playing field". This relates to Elm Grove Field, which was dedicated as a Queen Elizabeth II field in 2012, as part of a scheme to celebrate the Queen's diamond jubilee and to create a grassroots legacy after the London Olympics. The paper reported that "Coulston Estates are looking to build 200 homes at Elm Grove Farm, off Doylham lane, and Wiltshire Council's strategic planning officers have recently been talking to them about building a school on the nearby Elm Grove Field, to help with the town's primary school shortage". Elm Tree Farm is site 613 in the Draft Housing

Site Allocations Plan. This use of Elm Grove Field  
right next to site 613 was not mentioned in the  
Draft Plan, therefore no public consultation has  
occurred, even though it should clearly have been  
included at that time.

7. I cannot believe that your Department is speaking  
to developers about a possible change to site 613  
of the Draft Plan, when the consultation process  
has not been concluded by Wiltshire Council. Talk  
about counting your chickens before they are  
hatched! What is the point of this huge so-called  
consultation over the Draft Housing Site Allocations  
Plan, if your Department is prepared to start  
talking to developers about amending one of the  
possible sites (ie site 613) before the Council  
has even considered the original Plan, which  
did not include a school on the site of the playing  
field. Yet another indicator of your department's  
Cavalier attitude. It appears there was no  
intention to seek the views of the public over this  
land grab of a public dedicated place.
8. This playing field was dedicated in perpetuity as  
a playing field, yet within a mere 6 years of the  
signing of the Deed of Dedication your department  
is considering allowing it to be built upon, without  
public consultation, and in clear defiance of the  
original intention. This is disgraceful.
9. As a local resident in the Doylham Ward I  
object strongly to this ever being considered.  
There are 7 schools already within a one-mile  
radius of this site, so it is highly questionable  
whether yet another school is needed on this side of  
Trowbridge. Wiltshire Council would need consent  
from Fields in Trust for this to go ahead, and must

also provide an alternative piece of land with equivalent or better facilities in the same area.

10. It appears from the press report that the developers wish to swap the playing field for another piece of land in their control, which presumably would be part of proposed site 613 of the Draft Plan, because there is no other land nearby that they would own. Site 613 was intended, if included in the Draft Plan when it is considered by the Council, for house building, and it appears from the newspaper report that the developers are trying to obtain easier access to site 613 directly from Wiltshire Drive for that purpose under the guise of offering a school as part of site 613 under the Draft Plan.

11. We do not need or want a school on this site, which is a dedicated playing field, and large open green area for Drynham residents, the only one of any size left in our area. There are many objections to site 613, in any event, to which I have referred in my letter relating to consultations over the Draft Plan in August. Putting a school on this playing field is no more worthy than building houses on it after its dedication as a playing field under the "Fields in Trust" scheme, although the developers might think this more persuasive than the original planning for houses alone. Their entreaties should not have been entertained by your department at all before the Draft Plan was considered, especially without any public consultations, bearing in mind the huge public response to the Draft Plan still awaiting a decision, which you have known about for months.

12. I would like this letter to go before the Cabinet or Council meeting in July when the Draft Plan is considered.

Yours faithfully

**Comments on Wiltshire Housing Site Allocations Plan  
from [REDACTED] Salisbury (Consultation ID [REDACTED])**

**General Points**

The time allowed for consultation (from 15/5/2018 Cabinet meeting to 11/6/2018 consultation closure) is very short, particularly given that nearly 100 documents are being submitted to the Council meeting on 10/7/2018. The consultation does not appear to have been flagged up on Wiltshire Council’s Consultation Portal, nor on the existing webpages which relate to Housing Site allocations.

The responses given in Appendix M to the representations received need further work and clarification. Grouping the representations together and then providing a response seems to have resulted in key points which have been raised being overlooked. As an example, in Part 29 on ‘Implementation and Monitoring’ the point has been raised that Annual Monitoring Reports have not been produced: these are needed to monitor the effectiveness of the Core Strategy. This point is recorded in para 21.134. However the ‘Council’s response to the themes/issues raised [para 21.136] does not address this point.

Similarly, the comment (no. 785) regarding the lack of a Green Infrastructure strategy has been combined with another 132 comments on a variety of topics (Table 21.1). The Council’s response to the issues raised, from para 21.18 – 21.23, makes no reference to the failure to produce this document, and the proposed changes are ‘no changes proposed’. This is not an adequate response to the concerns which have been raised.

**Detailed comments on changes**

Change Ref No.	Comments
PC15/PC16	<p>It is unclear why the entirety of the Churchfields site is being deferred to ‘beyond 2026’ when self-contained parts of this site are currently vacant. Specifically, the Engine Shed site, to the north of Lower Road, is currently available for redevelopment: in 2014 this site was earmarked for imminent redevelopment of a Custody suite for the Wiltshire Police. Nothing came of that particular redevelopment, but it did transpire that the site was owned by Wiltshire Council which should make sale and development relatively easy.</p> <p>The environmental value of this land is still to be properly assessed, but the use of the Engine Shed site would comply with NPPF policies to promote the use of brownfield site [NPPF Para 111: <i>Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.</i>]</p> <p>Since the Engine Shed site is so convenient for the railway station and also for the City Centre and other amenities it would be a prime candidate for a high-density development which is particularly encouraged in the current revisions of the NPPF. [NPPF Draft text for consultation, March 2018, paras 122-123]</p>
PC74	<p>At the time of writing these comments (6/6/2017) the Salisbury Transport Strategy refresh is not completed. The 3 May 2018 document submitted with the other documents is labelled as ‘Draft Salisbury Transport Strategy Refresh’. A number of comments have been raised in respect of the draft Salisbury Transport Strategy, including the lack of metrics which can be used to measure success or otherwise of the transport interventions proposed. It will be</p>

	necessary to have the final version of the Salisbury Transport Strategy available to see whether these have been addressed.
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The right is reserved to make further comments both on the changes proposed and the manner in which representations to date have been dealt with when there is an appropriate opportunity for the public to do so, with sufficient time being allowed for documents to be read and comments to be made.

From: [REDACTED]  
To: [Spatial Planning Policy](#)  
Cc: [REDACTED]  
Subject: Schedule of Proposed Changes to the Wiltshire Housing Site Allocations Pre-submission Draft Plan (May 2018) - PC30 \*Printed HC\*  
Date: 11 June 2018 11:50:19

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Dear Sirs – on behalf of the Landowners ([REDACTED]) and the Developer ([REDACTED]) of the Long Field, Market Lavington (SHLAA Site 3268), we write in response to the Schedule of Proposed Changes to the Wiltshire Housing Site Allocations Pre-submission Draft Plan (May 2018) (the Draft Plan). These Representations should be read in conjunction with our Representations submitted at the Pre-sub submission draft Stage (15<sup>th</sup> September 2017).

The Proposed Changes provided the Council with an opportunity to address the fundamental conflict between the draft Market Lavington Neighbourhood Plan (NP) and the Draft Plan, a conflict that we had drawn attention to in our pre-submission representations. That conflict has been amplified since the Pre-submission consultation because of the considerable progress that the NP has made and the delay in progressing the Draft Plan. The conflict is now very serious and if not resolved will fatally undermine the NP – destroying that principle of the primacy of Neighbourhood Planning (a principle that the Draft Plan purports to espouse). The failure of the Proposed Changes to address this conflict (by holding any additional allocations at Market Lavington in reserve (to be released only should the NP fail to delivery an adequate level of housing) as we had proposed; or otherwise) means that the Draft Plan remains **unsound**.

In relation to the Proposed Changes, we **object** to the proposed increase in the size of Housing Site Allocation H1.2 (Underhill Nursery) (PC30) for the following reasons:

1. The pre-submission draft plan (July 2017) proposed that the Underhill Nursery site allocation should accommodate 50 dwellings (Policy H1). The Plan at Annex A of the Draft Plan shows that the Proposed Change (PC30) increases the size of the allocated site area by about 50% - and yet Table 4.4 (at Paragraph 4.28) still indicates that the allocation will accommodate approximately 50 dwellings. That is clearly non sensical. The Proposed Change will increase the capacity of the site – to accommodate at least 75 dwellings.
2. The increase in the size of this proposed allocation is directly contrary to the clearly expressed views of the Community; namely that further growth at Market Lavington should be accommodated in a few small sites dispersed around the village, rather than concentrated on a single large site. Increasing the size of the Underhill Nursery Allocation will also exasperate further the environmental impact that will be caused by an urban extension in this area (a level of impact that the site selection process has failed to properly assess). In particular, in our opinion the larger site will result in a “high to medium adverse” landscape and visual impact. We note that the Stage 4a Site Landscape Assessment (June 2017) did not assess the impact of developing the larger site that is now proposed. The larger site will also result in greater traffic impact on the village centre.
3. We also believe that the revised proposed site access (now to be achieved by demolishing one half of a pair of semi detached dwellings fronting on to Stirling Road) will have a severe and unacceptable impact on the residential amenity of the retained dwellings on either side. The proposed change to the Draft Plan, to provide an alternative access, is a clear acknowledgement that the site cannot be satisfactorily accessed from Fiddington Hill (as had been originally proposal). Whilst the revised access may be acceptable in terms of highway engineering, it would have an unacceptable impact on neighbouring dwellings. The conclusion is therefore clear – a satisfactory access cannot be provided to the Underhill Nursery site.
4. We assume that the Council is satisfied that this site is deliverable (ie is achievable and available now) with the revised access arrangement (notwithstanding our comments above).

Please acknowledge receipt of these Representations.

Regards

[Redacted]

[Redacted]

Director

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▶ [REDACTED]  
Planning Officer

Development Services  
Wiltshire Council  
County Hall  
Bythesea Road  
Trowbridge  
Wiltshire  
BA14 8JN

[REDACTED]  
Reference [REDACTED]

Date: 13<sup>th</sup> April, 2018

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Dear [REDACTED]

Cleeve House, Vicarage Lane, Upavon - Proposed additional dwelling.

I am writing in response to your letter of 28th March.

I note your comments concerning the site and that it may have been segregated at some unspecified point in the past. As far as we are aware that is not in recent history and does not surely bear any relevance in this issue. The review of the settlement boundary needs to be urgently reconsidered to include Vicarage Lane; it is illogical that it is not. Vicarage Lane is part of Upavon village, and has clearly been part of the village for in excess of 100 years. We, along with other residents on Vicarage Lane pay taxes to the Council, including the Parish Council tax. We have never been aware of any consultation by Wiltshire Council of the settlement boundaries or we would have written in. The omission of Vicarage Lane from the settlement boundary is a serious omission by the Council and must surely be rectified. If you are able to raise these concerns with your Local Plan team that would be very much appreciated.

You refer to the absence of a housing needs assessment, though I'm sure you will appreciate that as a private resident we would not have the resources to commission such an assessment, however, you are fully aware that we have been directly approached by an elderly resident who has a need for suitable accommodation in the village, hence us making this enquiry to you. We are prepared to agree to a mechanism within the S106 agreement that the property will only be occupied by someone over the age of fifty five. The buyer has agreed to such a limitation.

I cannot agree with the comment that the proposals would extend development along Vicarage Lane as both Cleeve House and Stable Cottage are located farther along the Lane and you have already observed that a building would have limited visual impact and your Conservation Officer has concluded it

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would not harm the Conservation Area.

The proposed property will have adequate parking and turning as well as meeting the requirements of parking. Any new access would be need to be well designed to ensure the earthworks and landscaping maintains the rural feel along the lane.

I note your comments concerning drainage. I am well aware of the importance of these in the proposals.

The principle of the development is important as the requirement of the property is to meet the need for downsizing. Also for the occupier to be able to live in a property that meets their need in later years and not to be too large or difficult to maintain is important. We are working in conjunction with the buyer to design and build a property that will not only meet their requirement but also to be a blueprint for future generations that will give them their own space, not to be too onerous to maintain but within their means and to give them privacy in a very pleasant location.

Concerning your comment about the location, there are several elderly people in Vicarage Lane and also in Avon Square and Watson Close who do not have problems in getting to the village, which is less than 5 minutes walk. As a matter of correction, there is street lighting in Vicarage Lane and the absence of a footpath does not present any issues as the Lane has few vehicle movements and provides a good surface for people to walk on.

I appreciate the comment that the proposed property would not have a negative impact on the character and appearance of the conversation area. As this is our intention as is the buyer's to have a house which fits in and does not detract from the character of the conservation area. This is one of our prime motivations. I understand the Council's policy stance but would hope that you would agree the omission of Vicarage Lane from the settlement boundary is anomalous and reasonably a dwelling in such a location would be acceptable. Furthermore, as you have identified a small dwelling would have limited visual impact, would not harm the conservation area and would not extend existing built form on the lane. There is an identified need for this self build dwelling for an elderly resident and the property can be retained with such a restriction going forward. There is no identified harm arising from this project and we would ask that you give further consideration on this basis in order to provide appropriate accommodation for the prospective occupier.

Yours sincerely,

