

Wiltshire Council

Cabinet

29 June 2021

Subject: Wiltshire Local Plan Review Update

Cabinet Member: Councillor Nick Botterill - Cabinet Member for Development Management, Strategic Planning and Climate Change

Key Decision: Key

Executive Summary

Following the approval of Cabinet on 1 December 2020, consultation was undertaken on the Wiltshire Local Plan Review between 13 January 2021 and 9 March 2021. This report provides an initial summary of the main issues that were raised through the consultation and the next steps.

The consultation was not on a draft Local Plan but on key components to inform one, including proposals for the scale and distribution of housing and employment growth across Wiltshire. It also sought views on the role of the Local Plan in helping the County adapt to and mitigate for climate change.

The consultation can be considered a success and encouraged a significant response. Overall, in excess of 3,500 representations were made from 2,682 people and organisations.

Collectively they represent a wide range of views and reinforce the need to further develop evidence on housing and employment growth, as well as the potential for renewable and off grid energy in Wiltshire and zero carbon development.

Development needs, such as those for affordable homes and land for business must be planned for positively. The consultation clearly shows that difficult choices will need to be made. Wiltshire as a whole remains a highly attractive location for the development industry and it continues to press for wider opportunities. In general terms, however, local communities are cautious about further growth. Concerns revolve around the environmental issues, ability for infrastructure to cope (particularly health, education and transportation) and the view that while significant housing has taken place this has not been matched with new jobs.

Concerns vary from settlement to settlement like the evidence underpinning each one's potential to grow. Understanding issues and concerns are an important part of the work going forward. The results of this consultation are an invaluable and central part of plan preparation, which will need to be considered fully alongside the development of new evidence to inform policies within the draft Plan. Whilst recognising the clear concerns of the local

community the Local Plan must be prepared on the basis of objective assessments of needs for housing and employment and a comprehensive appraisal of the evidence.

It is good practice to update the evidence base for a Local Plan throughout the plan's preparation. The consultation has led to a clear need for the Council to undertake further technical evidence on a range of issues. Updated evidence on growth forecasts are now needed to accurately inform the content of the draft Local Plan. In particular, the Council needs to look again at the range of housing needs to ensure it is evidence based and an appropriate deliverable housing requirement can be set for Wiltshire. A review of the evidence may lead to changes at housing market area level and the allocations within them. An integral part of the work moving forward will also involve considering what infrastructure will need to be planned for alongside housing growth. Further evidence is also needed to inform our future direction on renewable energy, off-grid energy and zero carbon development.

Proposal(s)

That Cabinet:

- (i) Notes this initial summary of main issues arising through the consultation and agrees the Cabinet Member for Development Management, Strategic Planning and Climate Change signs off the completed consultation report prior to publication on the Council's website;**
- (ii) Agrees that progress continues to be made to develop the Wiltshire Local Plan Review;**
- (iii) Agrees that further work is undertaken in response to the consultation on key parts of the evidence base, including:**
 - Testing the upper and lower levels and spatial distribution of the range of housing need for the plan period;**
 - A review of the employment evidence underpinning need for new employment land; and**
 - Wiltshire wide assessment of potential for renewable energy, zero carbon development and off grid energy networks at main settlements.**

Reason for Proposal(s)

Cabinet at its meeting of 1 December 2020 resolved to receive a report after the consultation summarising the main issues raised.

Terence Herbert
Chief Executive

Wiltshire Council

Cabinet

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Purpose of Report

1. The purpose of this report to:
 - (i) Provide an update on the main issues that were raised through the recent consultation on the Wiltshire Local Plan Review, as approved by Cabinet on 1 December 2020; and
 - (ii) Outline the next steps in preparing the draft Wiltshire Local Plan Review.

Relevance to the Council's Business Plan

2. The Business Plan 2017-2027 'Forward Thinking' seeks to create: strong communities in Wiltshire. The Local Plan aligns with all three of its priorities: Growing the Economy, Strong Communities and Protecting the Vulnerable. Delivering development where it is needed forms one of the goals of the Business Plan.

Background

3. Cabinet at its meeting on [1 December 2020](#) approved consultation documents to inform the preparation of the draft Wiltshire Local Plan Review, and delegated authority to the Director for Economic Development and Planning in consultation with the Cabinet member for Spatial Planning, Development Management and Property to make arrangements for the consultation to take place.
4. Consultation commenced on 13th January 2021 and closed on 9th March 2021. Due to the COVID-19 pandemic in line with the Council's adopted [Statement of Community Involvement](#) and Temporary Arrangements, consultation material was not displayed at Council offices and libraries, instead people were encouraged to view this via the Council's website. 17 webinars were held to enable people to find out more about the consultation and encourage people to respond - in total around 1,320 people attended these. Arrangements were also put in place to allow people who did not have access to the internet to have hard copies sent to them by post.

5. Now the consultation has been completed all representations are being considered in preparing the draft Plan and further work undertaken in response to these to develop evidence to inform its policies. Once the draft Plan is prepared this will be considered by both Cabinet and Council before the Plan is published and a final stage of consultation is undertaken - known as the Regulation 19 Town and Country Planning (Local Planning) (England) Regulations 2012 stage.
6. Once the Regulation 19 consultation stage is complete, the next stage will be for the Council to submit the draft Plan to the Secretary of State for independent examination by a Government appointed Inspector.
7. Through the examination process, the Council will need to demonstrate that the Plan has been prepared in accordance with legal and procedural requirements and that it is "sound". The tests of soundness are set out in national planning policy. To be sound, a Plan must be:
 - (i) **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - (ii) **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - (iii) **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - (iv) **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.
8. In considering the consultation response and working towards the publication of a draft Plan, it will be important as we move forward to think ahead to the examination process and build the plan with the legislative requirements and tests of soundness in mind.

Main Considerations for the Council

9. A considerable response was received to the consultation. Overall, in excess of 3,500 representations were made from 2,682 people and organisations who responded. There was a significant amount of views put forward, often taking different positions. An initial summary of these has been provided in **Appendix 1** and focuses on the main issues that are emerging from the consultation documents. Some of the key findings are outlined below together with the implications for the preparation of the draft Plan and development of evidence.

10. This is only an initial summary. There were many complex and detailed comments. Also, due to the weight of response and the different ways in which comments could be made - including web-based downloadable forms, email and letter - processing and analysing comments is taking time. A full consultation report is being prepared, as is normal practice, and will be published on the Council's website when it is available alongside the consultation responses submitted.
11. In general, the need to plan sustainably for Wiltshire is an underlying theme raised through the consultation response, with the importance of addressing and adapting to climate change, the health and well-being of communities and well-designed places being important components. There are clear concerns from the local community about growth and the need for infrastructure to keep pace with development; particularly health, education and transportation. Concerns have been expressed also about: the loss of valued landscapes around towns and coalescence with outlying villages; and not enough emphasis on brownfield land reuse. There were some calls for new settlements as part of an alternative strategy, but no specific proposals put forward other than a cross boundary proposal promoted by a developer (the majority of which relates to Cotswold District) for a new community of 2,000 homes at Kemble Airfield.

Housing growth

12. Significant comments in number and content were made about the overall scale of housing growth, with a range of views expressed.
13. The consultation sought to test the upper end of a range of housing need of 40,840 to 45,630 homes for Wiltshire, identified in the Swindon and Wiltshire Local Housing Need Assessment (LHNA) prepared by Opinion Research Services in April 2019, for the period 2016 to 2036.
14. The lower figure reflected the Government's standard methodology for new homes (the minimum number that a Local Plan must plan for) and the higher figure reflected local evidence that suggested Wiltshire will need more homes to balance forecast job growth and the working age population, to avoid people travelling into the county to work. There is a difference of around 5,000 homes between the lower and upper end of the range.
15. There was a clear divergence of views, with many considering that the impacts on the environment (e.g. landscape, biodiversity and carbon footprint) and/or infrastructure were too great for the higher or lower number. Conversely, the development industry was generally either supportive of the higher number or considered it should be raised further to boost housing and deliver more affordable homes. It was also suggested that the base date of the plan be reset (from 2016) and the plan period extended (from 2036) to allow for 15 years from adoption.
16. There is support from neighbouring authorities that Wiltshire is seeking to meet its housing needs within the county. In addition, there is currently no evidence-based requests from neighbourhood authorities to meet their unmet need in Wiltshire.

17. A main criticism about the higher figure was that the job forecasts that informed the figure were out of date and that the more recent events of COVID-19 and Brexit would suppress job growth, and thus reduce homes arising from that method.
18. In the light of the consultation response and national policy, it is considered that further work needs to be undertaken to refresh the Council's evidence on housing need. This includes updating the minimum standard methodology figure to consider new affordability data; updating the employment projections to inform the jobs / workers balance and understand the economic implications of COVID-19 and Brexit.

Employment growth

19. Concerns were raised about the employment evidence underpinning the need for additional employment land and its reliance on dated job growth forecasts that do not reflect the impact of COVID-19 and Brexit. In addition, challenges were made about how much and where new employment land was proposed, including the promotion of land at both Junctions 16 and 17 of the M4 motorway for strategic employment use and concerns raised about the need to deliver more jobs to allow people to live and work locally.
20. A review of the evidence to reflect a post Brexit and pandemic world is needed to ensure there is a sound basis on which to plan for the employment needs of different sectors in the right locations.
21. General concerns were also expressed about the need to plan for the regeneration of town centres, recognising their importance for the communities they serve and local economy. Further work will be undertaken to develop a policy framework to support and facilitate positive change within centres. Some felt that redevelopment opportunities should be taken to maximise residential development in town centres to avoid the use of greenfield sites. However, such an approach would need to be balanced against the desire to retain town centres as hubs for their local communities.

Distribution of growth

22. The LHNA firstly defined Wiltshire's Housing Market Areas (4 in total, see **Appendix 2**) and then distributed the growth at both ends of the range to these. As Wiltshire is so large, distributing growth by Housing Market Area (HMA) ensures that homes are delivered where they are needed.
23. In simple terms, using the upper end of the range for each HMA a distribution of growth was proposed for the main settlements (Principal Settlements of Chippenham, Salisbury and Trowbridge; and market towns) and the rural parts of each HMA. In the rural parts of the HMAs, housing numbers were proposed for the Local Service Centres and Large Villages as the most sustainable locations for growth after the market towns. Some felt that the level of growth to the rural areas was too high, while others thought it was not enough.

24. At the main settlements, generally there were mixed views expressed about the proposed scales of growth for each place, with reasons given for these. With at one end some local community representatives not wishing to see any growth at all to the other end where the development industry wishes to see higher levels of growth. All the views expressed will need to be looked at to ensure a fair and proper consideration of the issues they raise.

Planning for the main settlements

25. It is the detailed considerations at the main settlement level and the evidence underpinning their potential to grow and justification for this that in turn helps inform what the housing requirement for the Plan should be. Difficult choices will need to be made as in general terms the local community is cautious about further growth, albeit there is some recognition of the need to provide homes for future generations and the other benefits growth can bring. The main concerns revolve around the environmental issues, ability for infrastructure to cope and the view that while significant housing has taken place this has not been matched with new jobs.

26. At the principal settlements, preferred sites were proposed showing how the proposed growth could be accommodated. At the market towns, no preferred sites were proposed but views sought on the suitability of possible sites at settlements.

27. Some of the key points raised through the consultation about the main settlements within each housing market area are set out below.

Chippenham Housing Market Area

Calne:

- Growth was seen as closely linked to the provision of infrastructure, including the possibility of a bypass, and protecting employment provision.
- The neighbourhood plan should take a lead in identifying where development takes place, prioritising brownfield opportunities.
- Natural England raised concerns about outward expansion towards the Area of Outstanding Natural Beauty.

Chippenham:

- There was a significant amount of objection from the local community to the scale of growth on a variety of grounds, the most common being: environmental harm, traffic congestion, lack of justification and undermining tackling the climate emergency.
- There were considerable objections to new road proposals. Some suggested that the existing road infrastructure is sufficient and some suggested road improvements (e.g. Bridge Centre roundabout and further improvements to the A350 could be made instead).

- Support for Chippenham as a focus for growth came from developers and landowners, although questions were raised about whether the homes could be delivered in the timescale. There were no objections from statutory environmental agencies, pending further details
- Land was promoted as further development for employment at M4 Junction 17. Residential redevelopment was proposed for parts of Langley Park and Emery Gate.
- Possible opportunities from development were seen as local economic benefits (greater self-containment), restoration of the Wilts and Berks Canal and an extensive riverside park

Corsham:

- Town Council say local health services would face difficulties supporting any higher scales of growth than those suggested.
- Natural England object to two sites to the West of the town - sites 5 (The Circus) and 6 (Land to the North of 16 Bradford Road) - because of their likely adverse effects on ecological 'bat' designations in the area.
- Developers and landowners suggest alternative sites that include outlying locations, such as RAF Rudloe Manor

Devizes:

- Mixed response to scale of growth with developers being supportive or promoting more, while community generally thought 'about right' or too high with calls for brownfield only.
- Development should not worsen traffic problems in the town.
- Concern from Natural England and the North Wessex Downs AONB over sites that affect the designation; wider concern from the local community that not enough emphasis was placed upon the town's landscape setting, green space and heritage.
- Brownfield sites for new homes were promoted at Wadworth Brewery, Devizes School, and by NHS property on sites that are surplus.
- Many objected to Site 6, Greenacres Nursery due to its importance as community greenspace and for biodiversity.

Malmesbury:

- There were marked differences of view over the scale of growth between developers, suggesting higher scales reflecting the role of the town, and the local community suggesting lower ones in recognition of environmental constraints and pressures upon local infrastructure.
- Natural England raised concerns over sites that could affect the AONB whilst Sport England would object if the cricket club was proposed for redevelopment.

- Local community views asked for sports, leisure and the needs of the young to be given greater recognition.

Melksham:

- The local community does not accept that the town should accommodate a greater focus for growth than other settlements. The scale of growth would lead to a coalescence with Bowerhill and Berryfield and could not be supported by local infrastructure.
- Wessex Water suggest the proposed scale of growth requires further investigation to see what water and sewerage infrastructure may be needed.
- Developers suggest that several large sites would be necessary to deliver the proposed scale of growth.
- There was generally a mixed response to the possibility of an A350 bypass - some believed it is urgently needed, others that it will adversely impact the natural environment and was no longer a priority because of changing work patterns.

Salisbury Housing Market Area

Amesbury:

- There was broad support for the place shaping priorities, including support for more employment provision and for a stronger town centre.
- Separation of Bulford and Durrington from Amesbury is supported by parish councils, but some challenge by developers.
- The MoD object to site 3, which is constrained by the aerodrome and technical safeguarding zones associated with Boscombe Down.
- A significant new site is promoted to south west of Amesbury (land North of London Road and land east of A345) as a development of around 1,200 new homes.
- Land at High Post employment area (remote from Amesbury) is promoted by additional employment development.

Salisbury:

- The role of brownfield land was a main topic. The local community considered there should be greater focus on brownfield opportunities for new homes to avoid greenfield use. Developers considered that this source should not be relied upon.
- Churchfields continues to be supported as a redevelopment opportunity by the City Council and many in the local community.
- The local community were concerned about the consequences of growth; lagging infrastructure delivery, impact on highways, air-quality, landscape setting to the city and outlying settlements, and biodiversity.

- Developers argued that the scale of growth proposed for Salisbury should be higher, particularly given demand and a large local need for more affordable homes, more easily realised through greenfield development.
- There were concerns from Natural England and Historic England about the choice of preferred sites given the proximity and importance of constraints nearby them.

Tidworth and Ludgershall:

- The proposed scale of growth was considered broadly acceptable by the local community. Developers felt that a higher scale would reflect the towns' relationship to Andover.
- There was support for the delivery of Castledown Business Park ahead of additional employment allocations, to include provision for start-ups/small businesses. Town Council support also for limited retail and leisure uses.
- Several sites (MoD) were described as unavailable at this time and only site 4 (Land at Empress Way) is actively promoted.

Swindon Housing Market Area (within Wiltshire)

Marlborough:

- There was concern about the basis for the scale of growth proposed. This revolved around the balance of jobs and homes, what the extent of need for affordable homes was and how much the need for homes is from the local community itself.
- There was concern about the scale of growth and its possible impacts upon the Area of Outstanding Natural Beauty. Natural England object to site 2, land adjacent to Salisbury Road allocation.
- The local community felt the town needed a range of new infrastructure to support the scale of growth.

Royal Wootton Bassett:

- The local community suggested a lower scale of growth, one reason being the need for local services and jobs to balance past numbers of new homes.
- Town Council is only supportive of proposed level of growth if it can be assured that the infrastructure improvements to support it can be delivered.
- To developers, the scale of growth recognised the town's relationship with Swindon and higher growth could help to deliver infrastructure improvements.

- Sport England object to sites 1 and 3 (north of town) due to potential impacts upon use of nearby playing fields
- There was widespread objection to site 4, land at Whitehill Lane.

Trowbridge Housing Market Area

Bradford on Avon:

- The local community objected to the scale of growth because of significant environmental and infrastructure constraints. A lower scale should be focused on brownfield sites.
- There was a significant amount of objection to each site, but particularly Site 3 (Golf course) on traffic, landscape, ecological and amenity grounds.
- More emphasis should be placed on town centre recovery and job creation.

Trowbridge:

- Proposed allocation fails to accord with the Wiltshire Core Strategy as it fails to recognise Hilperton's status as a Large Village. Therefore, the proposals would not serve to meet the needs of the town but simply lead to the coalescence of the village with the town.
- Environmental impact of developing to the north-east of Hilperton would lead to increased risk of flooding, loss of habitats, increased pollution and a denudation of the historic character of Hilperton.
- Proposed location for growth at the town would lead to severe traffic congestion and an exacerbation of wider traffic impacts.
- Considering the environmental constraints at the town associated with the Western Wiltshire Green Belt, critical bat habitats and species, more emphasis should be placed on regenerating brownfield sites within the town before more greenfield land is built upon.
- Some suggested that development to meet the needs of the town should be spread around the town; redistributed to other Market Towns and/or the Large Villages of Southwick and North Bradley.

Warminster:

- Scale of growth was broadly acceptable, but possibly overly reliant on the West Warminster Urban Extension. Small sites for local builders might help avert possible housing supply issues.
- Development should be focused on the regeneration of brownfield sites.
- There was a mixed response in relation to the sites, but any new development should provide appropriate infrastructure.

Westbury:

- General support from the Town Council and developers for the proposed scale of growth, but tackling A350 congestion, providing more affordable housing homes, and a focus on town centre renewal were key priorities.
- The local community called for a lower scale of growth and improvements to existing infrastructure (e.g. schools, health facilities).
- Site 11, land at Redland Lane is an important playing field and losing it to development without compensation would be inappropriate.
- General consensus that there is no need for additional employment land.

28. It is also worth noting that there are landowners on the edge of settlements located in adjoining authorities (Shaftesbury and Swindon) who are promoting land that crosses into or is within Wiltshire. Equally there are landowners promoting the expansion of Ludgershall into the adjoining Test Valley Borough Council area. In the main this is for housing growth, but as set out in paragraph 19 above land at Junction 16 (Swindon) is also being promoted for employment use. Currently, as set out in paragraph 16 above, there are no requirements from adjoining authorities to meet their housing needs in Wiltshire.

29. Further work is being undertaken to consider an appropriate response to the consultation comments made and what revisions should be made to the spatial strategy. This will include identifying where changes may be justified to the scales of growth at the main settlements, as well as the preferred sites, and further detailed site assessment work to identify allocations for the draft Local Plan.

30. A critical part of the evidence base for the spatial strategy and distribution of growth will be further transport studies, which in simple terms will consider:

- (i) How self-containment of settlements could be improved to influence trip generation and reduce the need to travel, how a shift towards active travel and sustainable modes could be achieved; and to what extent this could reduce the reliance on the car and new road infrastructure. Scenarios will need to be looked at about how new development can support carbon neutrality in Wiltshire.
- (ii) What transportation infrastructure would be needed to support the spatial strategy (taking into account any revisions) and to form particular requirements for allocated sites.

Rural settlements

31. There were some calls to reclassify the status of a number of villages in the settlement strategy, which generally appear to be motivated on the basis that a lower classification (e.g. move from Large to Small Village status) would

mean less growth or a higher classification (e.g. move from Large Village to Local Service Centre) would mean more growth. These will all need to be looked at on an evidential basis to see if their role, function and the services/facilities they contain has changed substantially since they were first designated to justify any change.

32. The methodology to determine, and levels of, housing proposed for Large Villages and Local Service Centres were challenged. There were concerns that the method was too complex, while others thought it should add in more factors. Local communities were cautious about further growth, whereas those with a development interest sought an increase.
33. It was also suggested that Local Service Centres should be considered as strategic settlements with allocations made through the Local Plan, and less reliance placed on neighbourhood planning to deliver housing in the rural areas. Similarly, it was suggested that some Large Villages could also be considered as having a different strategic role borne out of their proximity to larger settlements.

Climate change

34. The consultation on the Addressing Climate Change and Biodiversity Net Gain paper generated significant interest. Comments generally fell into two groups. The first, those with environmental interests including general public and some parish/town councils, who felt the Local Plan should be more aspirational in terms of achieving zero carbon targets, particularly in terms of new development. In addition, this group of comments also considered that more emphasis should be placed on biodiversity enhancement, including placing open spaces at the heart of all new development.
35. The second group of comments included a significant lobby from the development industry who stressed a rapid transition to net zero carbon development would be unduly costly. Developers questioned the Council's evidence on the true costs of building to zero carbon standards. However, little evidence on such matters was submitted to illuminate their assertions.
36. In the light of the consultation response, the legal duty¹ to ensure the policies of the Local Plan address climate change, national policy and the Council's climate emergency declaration, it is considered that further work (alongside the transport evidence referred to above) needs to be undertaken to refresh the Council's evidence. This will include undertaking:
 - A Wiltshire-wide assessment of renewable energy potential focusing on wind, solar, biomass and other technologies.
 - An objective assessment of the cost of delivering zero carbon housing and commercial development (to feed into an overall Local Plan viability assessment).
 - An assessment of the potential for local energy networks at main settlements and the opportunity to identify potential off-grid energy sources.

¹ <https://www.legislation.gov.uk/ukpga/2004/5/section/19>

Overview and Scrutiny Engagement

37. Overview and Scrutiny has not been formally engaged in the proposals in this report. However, the Executive response to the recommendations of the Global Warming and Climate Emergency Scrutiny Task Group was considered by Environment Select Committee on 3 March 2021; and will be taken into consideration in the preparation of the draft Plan.

Safeguarding Implications

38. There are no safeguarding implications arising directly from the proposal.

Public Health Implications

39. Planning for sustainable development to meet the employment, housing and infrastructure needs of communities helps foster their wellbeing. Well planned development and good place shaping supports health and wellbeing of local communities, for example, through the provision of green infrastructure and infrastructure to encourage active travel (walking and cycling). Maintaining up to date policy for Wiltshire supports the timely delivery of social infrastructure to improve resilience of local communities

Procurement Implications

40. Procurement of further evidence to inform the Local Plan Review will be undertaken in line with corporate procedures.

Equalities Impact of the Proposal

41. The Council is subject to a public sector equality duty introduced by the Equality Act 2010. Consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement and associated Temporary Arrangements that are in place in the light of the COVID-19 situation. The consultation took an inclusive approach ensuring that everyone can be involved.

42. An Equality Impact Assessment will be carried out alongside the preparation of the draft Plan and will accompany the draft Plan when it is submitted to the Secretary of State for examination.

Environmental and Climate Change Considerations

43. In developing the Plan regard will continue to be given to the Wiltshire Council climate emergency declaration (26 February 2019), as part of policy and proposal formulation. To be legally compliant, the Plan must include policies designed to ensure that the development and use of land in the local planning

authority area contributes to the mitigation of, and adaptation to, climate change².

44. As summarised above, concerns about climate change and a desire for climate friendly planning policies have been articulated by consultees. Paragraph 36 sets out the work that will be carried out to develop the evidence relating to transport, renewable energy, zero carbon development policies and energy networks.
45. Sustainability Appraisal and Habitats Regulations Assessment also form an integral part of the plan making process. These help to ensure negative environmental impacts are avoided, and policies and proposals deliver development in a sustainable manner.

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

46. The principal risk is that progress is not made with developing an up to date Local Plan for Wiltshire, which will support plan led growth in the County and provide a framework for neighbourhood plans to be prepared. The Government expects all local planning authorities to have an up to date plan in place by 2023. If this is not done, the Council will be at risk of unplanned development on an ad hoc basis determined by the Secretary of State through planning appeals.

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

47. See above.

Financial Implications

48. Further evidence will be required to support development of the draft Plan (e.g. viability assessment, transport studies). The draft Plan will need to be progressed through subsequent stages of preparation including a further stage of consultation and examination before it can be adopted. While as far as possible the draft Plan will be developed using technical expertise of officers within the Council there is the need to procure support from external sources to ensure timely delivery.
49. Provision has been made for this in the 2021/22 Spatial Planning revenue budget and a recommendation has also been put forward to Cabinet as part of the Provisional Outturn 2020/21 report to create a Local Plan earmarked reserve. Future year budget requirements for 2022/23 and 2023/24 will need to be identified and included as part of the budget setting process.

Legal Implications

50. The Council has a statutory duty to prepare and maintain a Local Plan for Wiltshire (referred to in legislation as development plan documents), for which

² [Section 182 of the Planning Act 2008](#) [section 19 of the Planning and Compulsory Purchase Act 2004](#).

the process is set out in Planning and Compulsory Purchase Act 2004 (as amended) and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

51. Once adopted, the Plan will form part of the statutory development plan for the area and be used as such for determining relevant planning applications across Wiltshire.

Workforce Implications

52. Preparation of the draft Plan has workforce implications across the Council, as well as the Spatial Planning service. For example, specialist input from other services is required in relation to site proposals and policy development, as well as from legal due to the statutory nature of the process. Staff will need to be prioritised to work on the plan as the need arises. This is generally expected to be managed within current workforce capacity but will need to be kept under review.

Options Considered

53. The options open to the Council are limited as Wiltshire Council is legally required to maintain up to date planning policies for the county, and progress should continue to be made in line with the commitment in the Council's Local Development Scheme.
54. Government has set a target and expects up to date local plans to be in place by December 2023. Even with some slippage that may occur due to the weight of consultation response and the need to give this full consideration and develop further evidence, adoption is considered achievable by this target date.

Conclusions

55. The consultation has enabled the views of the local community and other stakeholders to be captured, which will inform important elements of the Local Plan. Further work now needs to be undertaken to develop the evidence base and consider in full the issues raised.

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15 June 2021

Appendices

Appendix 1: Summary of main issues raised through consultation on Wiltshire Local Plan Review

Appendix 2: Wiltshire's Housing Market Areas

Background Papers

None