

# Working towards a Core Strategy for Wiltshire

# Wiltshire Core Strategy Consultation Methodology Output Report

Reg 22 (1) (c)

Part 1: Process of consultation June 2012



### **Wiltshire Core Strategy**

# **Consultation Methodology Output Report**

Regulation 22 (1) (c) Statement

June 2012

**Part 1: Process of Consultation** 

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#### 1. Introduction

- 1.1. The Wiltshire Core Strategy, when adopted, will provide the up-to-date strategic planning policy for Wiltshire and ensure that Wiltshire develops in the most sustainable way.
- 1.2. This report documents the activities that took place between February and April 2012 to involve the Wiltshire community in discussions to progress a core strategy for Wiltshire. The Wiltshire core strategy pre- submission document was published for consultation on Monday 20<sup>th</sup> February 2012. The consultation closed on Monday 2<sup>nd</sup> April 2012. The pre-submission document was informed by two previous rounds of consultation undertaken by Wiltshire Council and early stakeholder consultation by the former district council's of Wiltshire (see table 1, below).
- 1.3. Section 2 of this report sets out the background to the Wiltshire core strategy pre-submission document, outlining how the preparation of the document was informed by previous consultation exercises. The consultation methodology is then presented in section 3, whilst section 4 provides an overview of the representations received and a summary of the key issues raised. A brief overview of the conclusions on the comments received is presented in section 5. Further detail on the issues raised in relation to each chapter of the core strategy is provided in appendix 12, and appendices 11 and 13 provide more detail on the conclusions of the consultation, respectively setting out a schedule of proposed changes to the presubmission document and a summary of the key issues raised where changes are not proposed.
- 1.4. This report forms part of a suite of documents which together comply with regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The requirements in regulation 22 (1) (c) relate to both consultations undertaken during the preparation of the plan (consultations undertaken in accordance with regulation 18) and the pre-submission consultation (undertaken in accordance with regulations 19 and 20).
- 1.5. In relation to consultations undertaken during the preparation of the plan (in accordance with regulation 18) the statement of consultation must set out:
  - who was invited to make representations;
  - how people were invited to make representations;
  - a summary of the main issues raised through the consultation; and
  - how these representations have been taken into account.

These requirements are met by reports produced at the earlier stages in the preparation of the Wiltshire Core Strategy and reports produced in relation to the South Wiltshire Core Strategy. Information about the bodies and persons invited to make representations on the Wiltshire Core Strategy Consultation Document in June 2011 is provided in paragraph 2.7 below.

- 1.6. In relation to the pre-submission consultation, the statement of consultation must set out:
  - the number of representations made; and

- a summary of the main issues raised in those representations.
- These requirements are met by section 4 and appendix 12 of this report. Section 4 provides a high level summary of the responses received and the main issues raised in these representations. Further detail as to the main issues raised in relation to each chapter of the core strategy is provided in appendix 12.
- 1.7. The local planning authority is also required, under regulation 22 (1) (d), to submit copies of any representations made during the pre-submission consultation to the Secretary of State. Copies of all representations received will therefore be submitted as part of the submission documentation. In addition, all comments will be available to view on the council's online consultation portal<sup>1</sup>. Comments have been entered into the online portal according to the most relevant section of the core strategy, and hence many representations have generated more than one comment on the portal.

Table 1: Stages of consultation in the production of the Wiltshire Core Strategy

Stage	Form of consultation	
Informal	Issues and options:	May 07 –
	A series of consultation papers prepared by former District	
	Councils	
	Reports on consultation:	
	www.wiltshire.gov.uk/planningpolicyevidencebase	
Informal	Wiltshire 2026:	Autumn 09 -
	Consultation document to draw together the work already	Winter 10
	undertaken by former districts and develop a shared vision and	
	objectives for Wiltshire including initial discussion of potential	
	development sites	
	Report on consultation:	
	Wiltshire 2026 Consultation Methodology and Output Report	
•	August 2010	
	www.wiltshire.gov.uk/wiltshire2026	
Informal	Localism events:	March- April
	To discuss the potential implications of the localism bill passing	2011
	through parliament, neighbourhood planning and housing growth	
	scenarios	
	Report on consultation:	
	Wiltshire Core Strategy Consultation Document Consultation	
	Statement January 2012	
	www.wiltshire.gov.uk/wcsconsult2011	
Informal	Wiltshire Core Strategy Consultation Document:	June -
	Proposals for the level and location of new employment land and	August 2011
	houses together with draft policies for controlling development	

<sup>&</sup>lt;sup>1</sup> The online consultation portal can be accessed at: http://consult.wiltshire.gov.uk/portal/spatial\_planning/wcs/pre-subconsult2012?tab=list

	Report on consultation: Wiltshire Core Strategy Consultation Document Consultation Statement January 2012	
	www.wiltshire.gov.uk/wcsconsult2011	
Formal	Draft Wiltshire Core Strategy:	February –
(Reg	Consultation prior to submission to the Secretary of State for	April 2012
19/20)	consideration to test the 'soundness' of the plan and the evidence	
	that supports it.	
Formal	Examination:	Autumn
	Examination of the plan by an independent inspector in the form	2012
	of topic based round table discussions.	

- 1.8. The Wiltshire Core Strategy Pre-submission Document has incorporated the adopted South Wiltshire Core Strategy. Information as to how consultation informed the preparation of the South Wiltshire Core Strategy is documented on the council's website<sup>2</sup>.
- 1.9. The consultation on the Wiltshire Core Strategy Pre-submission Document led to some representations which specifically relate to the Sustainability Appraisal (SA), and there was also a separate consultation on the SA which ran alongside the core strategy consultation. A summary of the representations relating to the SA will be provided separately in an appendix to the SA report.
- 1.10. The council's Statement of Community Involvement (SCI) was adopted in February 2010 and identifies several broad opportunities for community involvement in the preparation of development plan documents (p15, SCI):
  - evidence gathering
  - early community involvement
  - draft document
  - publication/submission to the Secretary of State
  - independent examination
- 1.11. The consultations identified ion Table 1 that took place between May 2007 and winter 2010 were a combination of evidence gathering and early community involvement. Those carried out during March and April 2011 represent a continuation of the early community engagement stage of plan preparation whilst the consultations during June and August 2011 were working towards a draft core strategy, although still on an informal basis. The Wiltshire core strategy pre-submission document is the beginning of stage 4 in the SCI programme of community engagement.

<sup>&</sup>lt;sup>2</sup> Details of the preparation of the South Wiltshire Core Strategy are available online at: www.wiltshire.gov.uk/southwiltshirecorestrategy

#### 2. Background to the Wiltshire core strategy pre-submission document

#### Wiltshire 2026

2.1 Consultation was completed on 'Wiltshire 2026 - Planning for the future of Wiltshire' in January 2010, with the outcomes reported to Cabinet on 20 April 2010<sup>3</sup>. Wiltshire 2026 formed the first stage in the development of a Wiltshire-wide core strategy. The document was based on the community areas outside of south Wiltshire, alongside an overarching spatial strategy for Wiltshire as a whole. Wiltshire 2026 enabled Wiltshire Council to identify with its communities what the issues, opportunities and challenges were in planning for jobs and homes in each community area. The number of jobs and homes to be planned for within the document were based on the then latest version of the Draft Regional Spatial Strategy for the South West (draft RSS). A full report of the consultation can be found on the Council's web site<sup>4</sup>.

Table 2: Summary of community engagement, Wiltshire 2026

Number of organisations and individuals consulted	4000
Number of organisations and individuals who responded	678
Number of comments received	2192
Number of exhibitions	17
Number of area specific workshops	15

#### Wiltshire core strategy consultation document and localism events

- 2.2 In 2010 the government stated its intention to revoke all regional spatial strategies and return decision making on future housing and employment growth to individual councils. The Localism Bill, published December 2010, took the first steps to implementing that intention and effectively introduced a policy gap for the preparation of the Wiltshire Core Strategy not only in terms of the overall supply of jobs and homes but also in many other policy areas such as carbon reduction, affordable housing and strategic transport. The Localism Bill also contained the basis for a new tier of plans within the development plan neighbourhood plans. These were to be locally produced by individual communities and would create a tier of planning policy at this local level. Not surprisingly there was a considerable amount of local interest in the role and purpose of these plans.
- 2.3 Wiltshire Council concluded that these changes would have a profound effect on the content of the Wiltshire Core Strategy. In particular, it was considered contrary to the emerging priority of 'localism' to proceed to a submission draft of the core strategy which contained detailed, locally derived, proposals for housing and employment growth without further community involvement in the process.
- 2.4 A series of open public meetings were arranged: one in each community area (see figure 1 for a map of the community areas in Wiltshire). These meetings had a dual purpose:

<sup>&</sup>lt;sup>3</sup> The 20 April 2010 Cabinet report on the Wiltshire 2026 consultation is available online at: <a href="http://cms.wiltshire.gov.uk/documents/s3824/Item%20No.%2009%20-">http://cms.wiltshire.gov.uk/documents/s3824/Item%20No.%2009%20-</a> %20Next%20Step%20in%20Developing%20the%20Wiltshire%20Core%20Strategy.pdf

The full report on the Wiltshire 2026 consultation can be viewed at:

www.wiltshire.gov.uk/wiltshire 2026 consultation methodology and output report august 2010.pdf

- in all community areas to inform the community regarding the emerging Localism Bill and its implications for neighbourhood planning and the emerging Wiltshire Core Strategy,
- in the community areas in north and mid Wiltshire, following on from the Wiltshire 2026 consultation, to carry out further consultation on possible growth options for the various areas to inform emerging core strategy policy options.
- 2.5 The outcome of these meetings was reported to Cabinet on 24 May 2011<sup>5</sup> as part of the wider discussion on the Wiltshire core strategy consultation document.



Figure 1: Map of community areas in Wiltshire

- 2.6 The Wiltshire core strategy consultation document was published for an 8 week consultation over the period Monday 13<sup>th</sup> June to Monday 8<sup>th</sup> August 2011. The purpose of the consultation was to allow public discussion on:
  - the proposed employment land to deliver jobs in Wiltshire and the proposed number of homes required for Wiltshire over the period 2006 to 2026

http://cms.wiltshire.gov.uk/ieListDocuments.aspx?Cld=141&Mld=5875&Ver=4

<sup>&</sup>lt;sup>5</sup> The 24 May 2011 Cabinet report on localism meetings and Wiltshire core strategy consultation document is available at:

- a draft spatial strategy for Wiltshire to deliver this growth and ensure sustainable development takes place
- emerging strategies for each community area outside south Wiltshire, including proposals for employment land and homes at the main settlements
- core policies relating to other matters such as affordable housing and design of new developments.
- 2.7 The bodies and persons invited to comment on the Wiltshire core strategy consultation document included:
  - Town and parish councils (within and adjoining Wiltshire)
  - Wiltshire Councillors
  - Community Area Partnerships
  - Neighbouring local authorities
  - Main statutory consultees (such as Natural England and the Environment Agency)
  - Organisations/community groups/businesses/individuals with an interest in the proposals
  - Site promoters registered in the Strategic Housing Land Availability Assessment (SHLAA)
  - People who had been involved in previous consultations run by the former district councils of Kennet, North Wiltshire, Salisbury and West Wiltshire.

The complete list ran to some 5500 organisations and people.

2.8 The outcome of the consultation was reported to Cabinet on 17 January 2012. The covering committee report included reference to the significant changes proposed to the core strategy as a result of the consultation<sup>6</sup>. These are set out in Appendix 1 of this report. The full report on the consultation (available on the web site) includes a schedule of proposed changes to each community area strategy and an overview of how each policy was amended to respond to consultation issues. Part 2 of the document sets out all the consultation responses and an initial officer response to the issues raised.<sup>7</sup>

Table 3: Summary of community engagement, Wiltshire Core Strategy Consultation Document

Number of organisations and individuals consulted	5500
Number of organisations and individuals who responded	1201
Number of comments received	2760
Number of drop in events	20
Number of participants at drop in events	1022
Number of localism workshops in north and mid Wiltshire	14

<sup>&</sup>lt;sup>6</sup> The 17 January 2012 Cabinet agenda and reports can be accessed online at: http://cms.wiltshire.gov.uk/ieListDocuments.aspx?Cld=141&Mld=6630&Ver=4

<sup>&</sup>lt;sup>7</sup> The Wiltshire Core Strategy Consultation Document Consultation Statement is available online at: www.wiltshire.gov.uk/wcsconsult2011

#### South Wiltshire core strategy

2.9 The South Wiltshire core strategy was adopted by Wiltshire Council on 7<sup>th</sup> February 2012. It relates to the former area of Salisbury District Council. In order to present a single core strategy for Wiltshire new policies (compared to the Wiltshire core strategy consultation document) have been included in the Wiltshire core strategy pre-submission document from the South Wiltshire Core Strategy. Those that are spatially distinctive and relate to the Community Areas have been integrated in full with minor changes to the wording and format to ensure consistency with the other Area Strategies. Some of the supporting text has been removed or redrafted in the interests of clarity, although the substance has not been lost. Other core policies (e.g. relating to affordable housing) have been updated where consultation has been undertaken through the Wiltshire Core Strategy Consultation Document (June 2011) and/or new evidence has indicated revisions to policy to be necessary. Policy relating to Tourism development (new Core Policy 39) and Hotels, Bed and Breakfast, Guest Houses and Conference Facilities (new Core Policy 40) have been applied to the whole of Wiltshire.



#### 3. Wiltshire core strategy pre-submission document

#### **Consultation Methodology**

3.1 The Wiltshire Statement of Community Involvement identifies the categories of consultation that should be considered at each stage of development plan document preparation. For the Wiltshire core strategy pre-submission document, the following methods were used:

#### Awareness raising

- Press and media
- Website
- Written material (posters, leaflets, flyers)
- Direct mail

#### **Existing networks**

- Area boards
- Libraries
- Parish and town councils

#### Direct involvement

- Questionnaire
- On line consultation software
- Workshops
- 3.2 The main element of the consultation was the production of the pre-submission document and a dedicated web page for information and the submission of comments. As part of the main consultation document on the web site questions were embedded within the text to focus comments on specific areas of concern. Everyone was also invited to submit general comments in writing on any part of the document.

Table 4: Process of stakeholder engagement

What	Purpose and brief comments	Copy available at:
Awareness raisir	ng	
Wiltshire core strategy pre- submission document	The Wiltshire Core Strategy Consultation Document sets out how Wiltshire will provide the new job required by our economy and the new homes for our growing and ageing population whilst protect Wiltshire's natural environment and strengthening our communities.  The document has been shaped by previous consultations, but this is the first time the draft strategolicies that will manage how Wiltshire develops have been brought together for consideration and comment by the wider community.  The pre-submission document was supported by 16 topic papers which provided the background information used to inform the draft policies and proposals in the plan. A number of bespoke rese projects were also published to support the content of the core strategy. These are all available on web site.	List of topic papers and evidence base documents at Appendix 2.  Copy of plan, topic papers and evidence base at www.wiltshire.gov.uk/w
Advert in local press  Press call	Placed in the local press to raise awareness of the consultation during the week commencing 13 February 2012.  • Gazette and Herald • Andover Advertiser • Salisbury Journal • Wiltshire Times  Warminster Journal  To inform press in a positive way about the content of the Wiltshire core strategy consultation doc and the purpose of the consultation. A press call was held just before Cabinet considered the proper pre-submission document on 17 <sup>th</sup> January 2012. A subsequent press release was issued following	

What	Purpose and brief comments	Copy available at:
	There were a number of radio and TV interviews that stemmed from the press calls and press releases and several articles in local papers including:  BBC Radio Wiltshire, 17 <sup>th</sup> January – item about Chippenham plans  BBC Points West, 17 <sup>th</sup> January – general interview with lead Member before Cabinet  BBC Radio Wiltshire, 18 <sup>th</sup> January – general interview with lead Member in studio  Wiltshire Times, 27 <sup>th</sup> January – double page in reaction to core strategy in West Wiltshire  Gazette and Herald, 19 <sup>th</sup> February – general article about the start of the consultation	
Poster and 'Pull ups'	A poster was circulated to all libraries advertising the consultation and circulated through the Area Board network. A large version of the poster in the form of a 'pull up' was also displayed in the council's main offices in Trowbridge (County Hall and Bradley Road), Devizes, Salisbury and Chippenham.	Appendix 5 –poster and 'pull ups' and photos of pull-ups in situ. Appendix 6 – list of libraries and display locations
Web site	All information was made available on the council's web site from 20 <sup>th</sup> February 2012.	www.wiltshire.gov.uk\w iltshirecorestrategy
Letters/ E-mails	To inform people already on the council's database of the consultation and to fulfil the council's obligations to consult specific consultation bodies and general consultation bodies under regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) (now covered by regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012).	Copy of letter:  www.wiltshire.gov.uk/w iltshirecorestrategy

What	Purpose and brief comments	Copy available at:
	The letter went to all parish and town councils (within Wiltshire and adjoining Wiltshire), known Community Area Partnerships, main statutory consultees (e.g. Natural England, Environment Agency, English Heritage) and a range of other interest including site promotes and land owners, local interest groups, housing associations, local businesses and service providers. The complete list ran to around 13,700 organisations and people <sup>8</sup> .	
Existing netwo	rks	
Area boards	At area board meetings a short chairman's announcement was made to draw attention to the consultation on the Wiltshire core strategy pre-submission document and the period for consultation. Because the area board cycle extended beyond the 6 week consultation period announcements were started following Cabinet consideration of the document on 17 <sup>th</sup> January. The nature of the announcement was amended to relate to whether the announcement was made before Full Council on 7 <sup>th</sup> February or after. The text of the announcement was circulated with the agendas to each community area's network of contacts.  Area board managers were also asked to distribute electronic versions of the A4 poster to their network of contacts.	Copy of poster - Appendix 5  Example announcement and list of area board dates where announcement was made – Appendix 7
Libraries	All libraries acted as a point of reference for viewing copies of the consultation documents (Wiltshire core strategy pre-submission document, non technical summary of the Sustainability Appraisal, non technical summary of the Habitats Regulations Assessment) and had questionnaires available and posters advertising the consultation.	Appendix 6 – list of all libraries identifying which libraries also hosted a small display.

<sup>&</sup>lt;sup>8</sup> This figure may include an element of duplication as some consultees may have received two letters/emails.

What	Purpose and brief comments	Copy available at:
	In addition a small display was erected in the larger libraries in the county for the duration of the consultation to provide further information. The displays were specific to the community area During the consultation A4 versions of the display were circulated to those libraries too small to host a full display so that the information was available in all libraries.	Appendix 8 – Example of display boards at larger libraries
Town and Parish Council's	Town and parish councils were contacted directly by letter and invited to the workshops arranged during the consultation to discuss policies in the core strategy for the rural areas and the relationship to neighbourhood planning.  Parishes were also informed via the council's electronic parish newsletter in the February and March editions. The parish newsletter is published monthly and provides brief summaries of key reports, consultations and news about the work of Wiltshire Council.  Cricklade Town Council and Devizes Town Council hosted a copy of the display boards available in libraries for the duration of the consultation period in their offices to help raise awareness of the consultation.	The February and March parish newsletters can be viewed at www.wiltshire.gov.uk/p arishnewsletterhome
Direct involveme	ent	
Rural Workshops	<ul> <li>Rural workshops were held at:</li> <li>Biddestone Village Hall, Wednesday 7th March, 6.30 for a 7 pm start</li> <li>Michael Herbert Hall, Wilton, Thursday 15th March, 6.30 for a 7pm start</li> <li>Bouverie Hall, Pewsey, Monday 19th March, 6.30 for a 7 pm start</li> </ul>	Appendix 9 – copy of rural workshop presentation  Appendix 10 – record of rural workshops

What	Purpose and brief comments	Copy available at:
	• Corn Exchange, Devizes, Thursday 22nd March, 6.30 for a 7pm start  The purpose of the meeting was twofold: to explain the approach to villages in the core strategy and specifically how villages were placed in the settlement hierarchy; and to explain the relationship between the core strategy and neighbourhood plans. Previous consultations had concentrated on proposed development in the market towns and principal settlements and there was a need to develop a better dialogue with rural parishes. All parishes were invited to send one or two representatives.	
Consultation software	An on line consultation portal was used to enable quick and easy submission of comments. All documentation, including representation forms and topic papers, was within the consultation portal. The on-line version of the core strategy was set up with opportunities to comment included against every policy and section of the plan.	The consultation portal can be accessed at: http://consult.wiltshire. gov.uk/portal/spatial_pl anning/wcs/pre- subconsult2012?tab=list
Representation form	A representation form was available on line, in libraries and on request. The form was based on Planning Inspectorate advice in 'Local Development Frameworks: Examining Development Plan Documents: Procedure Guidance, August 2009'. The form was supported by guidance notes on how to submit comments	Representation from and guidance notes available at:  www.wiltshire.gov.uk/w iltshirecorestrategy

# 4. Wiltshire core strategy pre-submission document overview of consultation

4.1 This section of the report sets out an overview of the comments received in response to the consultation on the Wiltshire core strategy pre-submission document and provides a brief summary of the key issues raised in relation to each part of the plan. The figures and charts presented in this section are currently in draft form, and will be updated prior to submission to take account of a few additional comments which have been inputted since the figures and charts were generated.

Table 5: Summary of community engagement, Wiltshire core strategy pre-submission document

Number of organisations and individuals consulted (by e-	13,728 <sup>9</sup>
mail/letter)	
Number of organisations and individuals who responded	437
Number of comments received	1787
Number of workshops	4
Number of participants at workshops	129

#### **Rural workshops**

- 4.2 Four rural workshops were held during the consultation period to explain the approach to villages in the core strategy, and specifically how villages were placed in the settlement hierarchy, and to explain the relationship between the core strategy and neighbourhood plans. The issues raised at the workshops included questions around how the settlement hierarchy had been defined, uncertainty about how policies would be applied, questions around how local community housing need (for both open market and affordable housing) can be identified, questions about whether Conservation Areas would be maintained, concern about the removal of settlement boundaries and concern that developers would lead the development process. There were also detailed questions about specific villages or specific policies, such as the affordable housing policies and the approach to settlement boundaries.
- 4.3 A number of questions relating to neighbourhood planning arose at the rural workshops, including questions about the process (such as details of the referendum and what Wiltshire Council's role will be), questions about the status of other approaches such as Village Design Statements, questions about the content (such as how detailed neighbourhood plans should be) and questions about how the process will be funded and how long it is likely to take to prepare a neighbourhood plan.
- 4.4 Notes of the discussions at the rural workshops are provided in appendix 10 of this report, and this includes details of the officer responses given at the meetings.

<sup>&</sup>lt;sup>9</sup> This figure may include an element of duplication as some consultees may have received two letters/emails.

#### Consultation responses: nature of respondents

- 4.5 In all the council received letters of comment from over 430 different organisations and individuals which resulted in over 1780 separate comments. Two petitions were received: one with 94 signatures objecting to development around Rowden and Patterdown in Chippenham; and the second with 256 signatures requesting that the council ensure that land along Coate Road adjacent to Windsor Drive, Devizes is not included as a strategic site and will not be given permission for housing development. These petitions have been counted as single consultation responses for the purposes of this report.
- 4.6 Figure 1 below shows the breakdown of respondents by type. This shows that the largest group of respondents was members of the general public, followed by landowners/developers and then parish and town councils and neighbouring authorities.

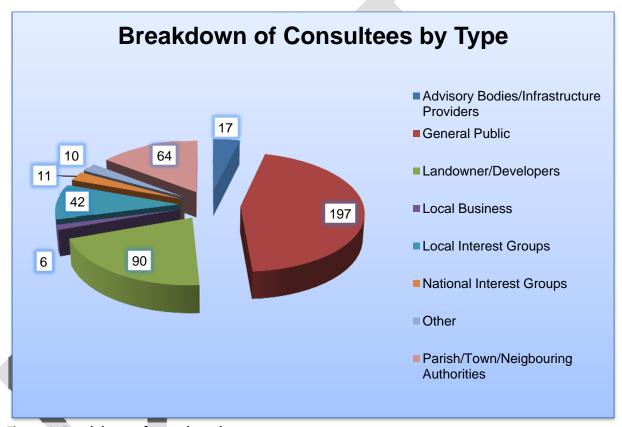


Figure 1: Breakdown of consultees by type

#### Nature of responses

4.7 Figure 2 below shows the breakdown of comments received in relation to each chapter of the core strategy pre-submission document.

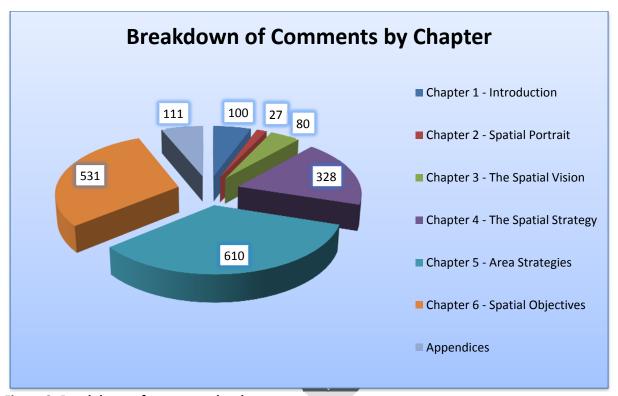


Figure 2: Breakdown of comments by chapter

- 4.8 The breakdown of the type of respondents varied for each chapter, with the area strategies in chapter 5 generating a larger number of comments from the general public than the other areas of the strategy. The breakdown of the comments received from each type of consultee in relation to each chapter is presented in figure 3 below. Figures 4-6 provide a more detailed breakdown for chapters 4, 5 and 6.
- 4.9 Please note that some consultees have been included within more than one categorisation which means that some comments will be 'double counted' in the following graphs. This will affect the total number of comments shown in each graph.

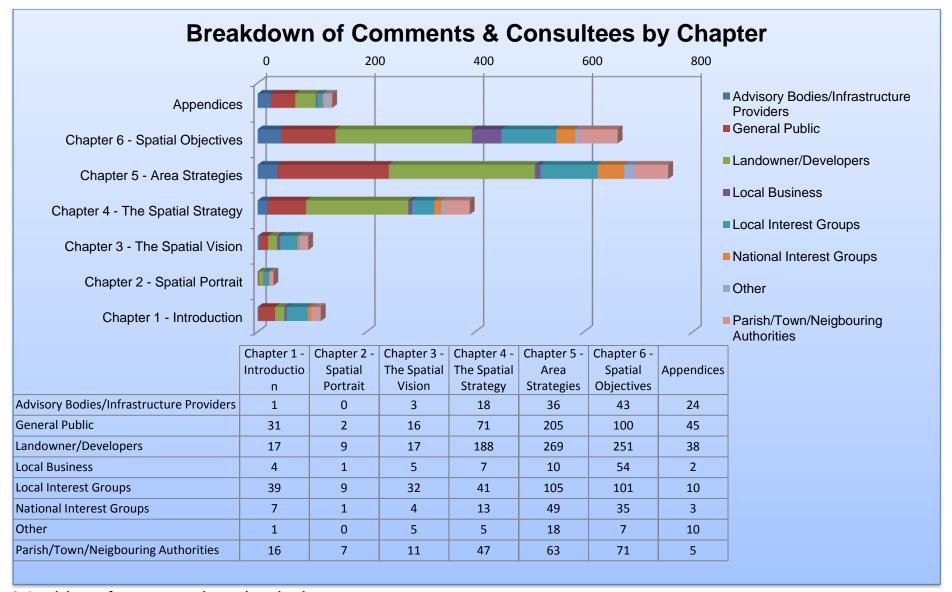


Figure 3: Breakdown of comments and consultees by chapter

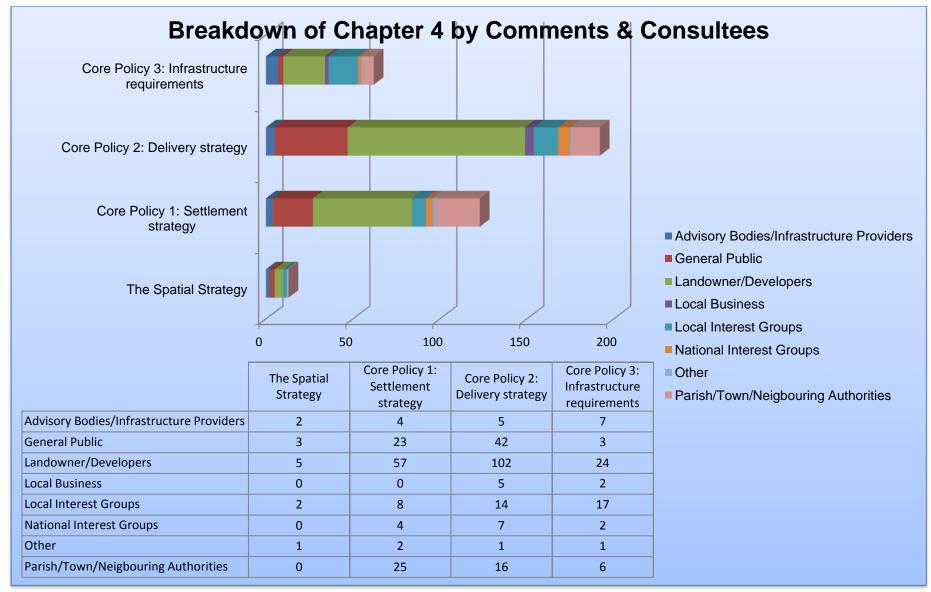


Figure 4: Breakdown of comments and consultees for chapter 4

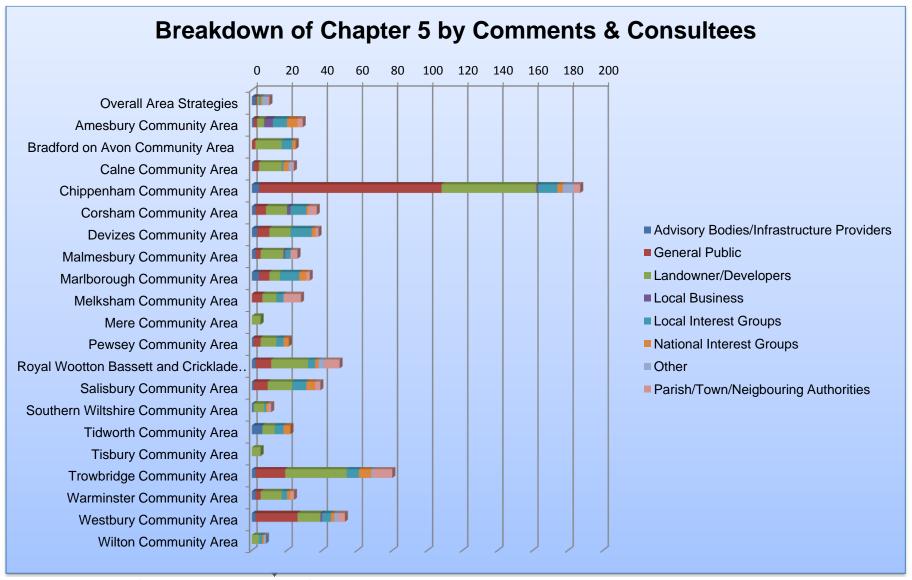


Figure 5: Breakdown of comments and consultees for chapter 5

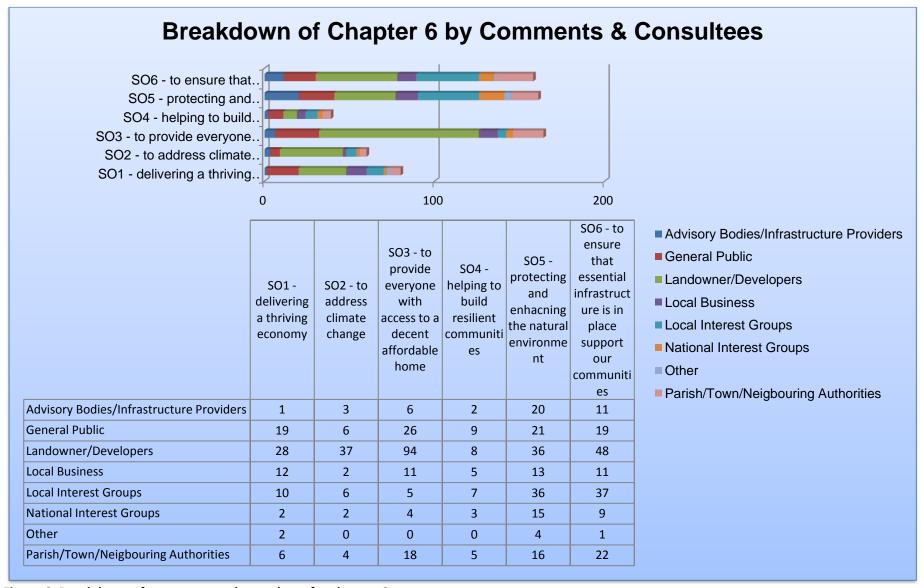


Figure 6: Breakdown of comments and consultees for chapter 6

#### **Key issues**

4.10 The key issues raised in the representations are summarised in table 6 below. The list is not exclusive and further details of the issues raised in relation to each chapter of the core strategy are provided in appendix 12. In addition, all comments will be available to view on the online consultation portal<sup>10</sup>.

Table 6: Summary of key issues in relation to each part of the core strategy

Chapter/policy	Key issues raised
1: Introduction	Concerns about the consultation process:
	<ul> <li>More weight should be given to comments made.</li> </ul>
	<ul> <li>Reponses published on the web site are often too</li> </ul>
	simplistic or miss the point.
	<ul> <li>Advice on how to comment misleading and non</li> </ul>
	compliant with SCI
	<ul> <li>Overly complex and uses too much jargon</li> </ul>
	<ul> <li>Objective (online system) not easy to use and expects</li> </ul>
	comments to be submitted on single issues.
	<ul> <li>Availability of documents at library and complexity of evidence.</li> </ul>
	<ul> <li>Complexity of consultation process.</li> </ul>
	<ul> <li>Opinion divided as to whether Core Strategy is consistent with the National Planning Policy Framework (NPPF). Suggestion that council should reconsult to take account of the NPPF.</li> </ul>
	<ul> <li>Need map to show town and parish boundaries and other</li> </ul>
	designations.
	<ul> <li>Definition of sustainable development needed.</li> </ul>
	<ul> <li>Cannot force a more sustainable society on people by simply</li> </ul>
	providing jobs and homes in the same location.
	<ul> <li>Seek a referendum at Chippenham to properly reflect resident's wishes.</li> </ul>
	<ul> <li>Document in relation to Trowbridge doesn't properly reflect public opinion.</li> </ul>
	If development at West Ashton goes ahead, S106/CIL from the
	site should be used for town centre regeneration.
	Strategy focuses on road corridors rather than urban regeneration.
	Targets for additional housing should be based on statistics and
	trends and use a bottom up approach to assessment of local needs.
	How the SWCS has been merged into the WCS.
	Support for approach to landscape scale conservation.
	<ul> <li>Diminishing water resources have not been taken into account.</li> </ul>
	Role of other SPD, DPD, VDS and Village Plans.
	No recognition of the needs of faith groups.
	<ul> <li>Need to additional evidence in relation to tourism, traffic congestion and air quality.</li> </ul>
	Louigestion and an quanty.

<sup>&</sup>lt;sup>10</sup> The online consultation portal can be accessed at: http://consult.wiltshire.gov.uk/portal/spatial\_planning/wcs/pre-subconsult2012?tab=list

	Overly ambitious.
2: Spatial Portrait	Trying to reduce out commuting is the wrong strategy
	Superfast broadband is essential Wiltshire-wide
	Plan fails to adequately address water resources
	Additional 3000 houses should be reserved West of Swindon
3. Spatial Vision	Widespread support
3. Spatiai Visioli	The ambition and effectiveness of the climate change objectives
	were questioned
	<ul> <li>There was strong representation that meeting places and places</li> </ul>
	of worship should be referenced
	A number of requests to tighten up the key outcomes related to
	safeguarding landscapes especially the AONB and WHS.
	Housing numbers are too low to meet the objectives
	Housing numbers are too high to meet the objectives
	Strategic objective 1:
	<ul> <li>Need higher education provision (including 16+) to</li> </ul>
	match target sectors
	<ul> <li>Support SO1 but concerned that approach is not carried</li> </ul>
	through the strategy
	<ul> <li>Location of Chippenham strategic sites does not agree</li> </ul>
	with SO1
	<ul> <li>Not practical to suggest retail development will only</li> </ul>
	come forward in town centres. Inconsistent with NPPF.
	<ul> <li>Support for SO1 and particularly key outcome in relation</li> </ul>
	to the tourism industry.
	Welcome for key outcome relating to redundant MOD
	land.
	<ul> <li>Concern at removal of policy on rural diversification and enterprise which was included in earlier consultation</li> </ul>
	document.
	o Should recognise Swindon as important regional centre.
	Approach to prevent out commuting could have
	detrimental effect on economic growth.
	New retail provision should provide more effective
	choice and competition.
	<ul> <li>The jobs/employment land forecasts are neither sound</li> </ul>
	or evidence-based: further work is required.
	<ul> <li>Lack of clarity over how the figure of 27,500 jobs and</li> </ul>
	178 ha employment land is arrived at.
4. Spatial Strategy:	Widespread support, but with minor changes proposed
Core Policy 1 –	CP1 is inflexible and will constrain and stifle development, and is
Settlement	therefore contrary to NPPF
Strategy	<ul> <li>Needs radical rethink of spatial strategy to be compliant with</li> </ul>
	European Law
	No reference to Conservation Areas
	<ul> <li>Approach to small villages is too restrictive and simplistic and is</li> </ul>
	not specific enough about when development is acceptable
	<ul> <li>Concern about how policy could be interpreted around</li> </ul>
	settlement boundaries
	<ul> <li>Village policy limits should be retained for small villages</li> </ul>

#### Settlement boundaries are out of date and should be expanded/reviewed Strong support for Trowbridge and Salisbury being identified as Principal Settlements; some support for Chippenham, but also a number of objections. Number of suggestions for changes to designations of the other settlements CP1 does not recognise cross border relationships; should include a 'West of Swindon' category. 4. Spatial Strategy: Plan period should be extended to cover 15 years; housing and Core Policy 2 employment requirements should be increased accordingly. **Delivery Strategy** Housing requirement should be increased: Not sufficiently flexible Does not plan for specific uncertainties (capacity of J16, closure of RAF Lyneham) Contrary to the NPPF Projections used do not accord to high economic growth Should accord with latest CLG household projections Will worsen affordability of homes Does not accord with SHMA Does not accord with SA Will not meet sub-regional requirement, as neighbouring authorities have also reduced housing requirements Overly restrictive and does not encompass the presumption in favour of sustainable development Should reflect RSS Methodology is not transparent Assumes a change in people's behaviour Does not reflect SHLAA. Housing requirement should be decreased: Infrastructure already over-burdened No justification Has been maintained from RSS and is based on out-ofdate models Population growth should be managed by Government Based on shaky demographic and migration assumptions Insufficient water resources. General support for the housing requirement from 5 respondents Concerns about the distribution of housing: Housing Market Areas are arbitrary o Community Area and settlement housing targets are too prescriptive Former district boundaries should be used Reduction from RSS targets has not been applied

in parallel

consistently across Wiltshire

Should be mechanism to ensure housing and jobs are delivered

- Wording in paragraph 4.23 should be changed to make it clear that while the Council wants to bring forward employment, the Core Strategy does not include a policy which links delivery of housing with employment.
- Employment requirement:
  - o This should be a minimum
  - o Employment land should be of the right type and in the right location
  - Sites outside the main settlements should be supported
  - Need to ensure that population have sufficient skills to support new employment delivery
  - o Should prioritise release of strategic employment land
- Brownfield development:
  - Mix of views as to whether brownfield sites should be prioritised.
  - Brownfield development outside settlement frameworks should be permissible if more sustainable.
  - Brownfield target should be increased.
  - No need for Brownfield target.
  - Should be mechanism to ensure Brownfield target is achieved.
- Location of development:
  - Community led plans should be able to identify development adjacent to small villages
  - Parish Plans and Village Design Statements should be included as sources of supply
  - Small, sustainable developments should be allowed outside limits of development
- Delivery of development:
  - Further detail needed on how and when site allocations
     DPD will be prepared
  - o Additional sites should be included as strategic sites
  - Community led plans should not be relied upon to deliver
- Duty to co-operate should be evidenced
- Masterplans should provide sufficient flexibility
- Should be a requirement for places of worship.
- 4. Spatial Strategy: Core Policy 3 – Infrastructure Requirements
- Viability assessment is only necessary for development proposals where there is a dispute over viability
- Viability of the Core Strategy should be reviewed in line with the NPPF
- Prioritisation:
  - Meeting halls and places of worship should be included as 'place-shaping' infrastructure
  - Suggestions to changes to lists of essential and placeshaping infrastructure
  - Full definition of 'essential' and 'place-shaping' infrastructure should be provided
  - Current methodology is too generally applied across
     Wiltshire
- Developer contributions:

- Contributions should not be required prior to development, and should be provided in stages
- o Should clarify that there is no 'claw-back' principle
- CP3 should recognise that some payments may not be capable of being made.
- Planning permission should be deferred rather than deferring contributions
- Community Infrastructure Levy:
  - Community should decide how CIL is spent for substantial developments, and the council should liaise directly with town and parish councils over CIL
  - Request for firmer indication of the CIL to be set, and IDP to be costed
  - Guidance note on planning obligations and CIL should be in place as part of Core Strategy
  - CIL should be used for site-specific infrastructure or within the local area
- Planning obligations should be subject to tests set out in the CIL Regulations 2010
- Should clarify position in relation to planning obligations post-2014
- Omissions:
  - State what priority will be given to affordable housing
  - o More detail on emergency fire and rescue service
  - o Should refer to water and sewerage infrastructure
  - Should mention off-setting and biodiversity/eco system loss compensation mechanisms
  - Need definition of sustainable transport
- Need clearer delivery strategy
- South Wiltshire Core Strategy should be re-examined in terms of making best use of existing infrastructure
- Should make better use of existing infrastructure
- Review strategic allocations in light of provision of on- and offsite contributions to sport facilities.

In addition to the above, a number of comments were received in relation to the Infrastructure Delivery Plan. The key issues arising from these comments are summarised below at the end of this table.

## Area Strategies (introductory text)

- Overall level of growth:
  - Housing and employment land quanta are too high and not supported by robust and credible evidence base.

    Growth projections should be revised downwards.
  - Contingency sites should be added to the plan to address potential underperformance in delivery of housing during the early plan period.
- The Plan must take a consistent and coherent approach to the management of development and protection of historic assets.
   Relationship between CP58 and the approach taken in the Area Strategies needs to be consistently applied.
- Impact on designated landscapes:
  - o Proposals will lead to unacceptable impacts on the

<u></u>	
	North Wessex Downs AONB.
	<ul> <li>To offset and/or address impacts on the AONB,</li> </ul>
	Community Infrastructure Levy money should be
	directed towards ensuring the objectives of the relevant
	AONB Management Plan are delivered.
	Suggestions made in relation to more than one community area
	included:
	<ul> <li>The plan period should be extended to 2028</li> </ul>
	<ul> <li>The statement about the master planning process</li> </ul>
	should be clarified
	<ul> <li>The text should be amended to clarify that housing and</li> </ul>
	employment figures are minimum targets
	o The final paragraph of CP7 should be deleted: it would
	be better suited to supporting text.
Amesbury Area	Need clarification as to which of the three 'Gomeldons'
Strategy	settlements are identified as a small village.
Strategy	<ul> <li>Concern that evidence base supporting changes to Amesbury is</li> </ul>
	limited through reliance on previous planning effort focused on
	Salisbury.
	<ul> <li>Housing sought in Kings Gate area may require balancing growth in retail, road, education and leisure facilities.</li> </ul>
	Principal Employment Areas should be shown on the proposals
	map.
	<ul> <li>Previous local plan employment allocation at Solstice Park should be saved.</li> </ul>
	Bullet points in relation to Salisbury Plain Special Protection  Area and the River Aven Special Area of Consequentian are not in
	Area and the River Avon Special Area of Conservation are not in
	line with the Habitats Directive. Suggested changes to the text.
	Reference to Stonehenge in paragraph 5.15 is both misleading  and incorrect Suggested sharpes to tout
	and incorrect. Suggested changes to text.
	Bullet points 5, 11 and 14 of para. 5.19 do not underline the
	Council's intention in respect of the WHS. Suggested changes to
	text.
	Wording of para. 5.28 should be amended for accuracy and
	clarity of understanding in relation to the primary aim of the
- 16	WHS Management Plan.
Bradford on Avon	Should recognise importance of AONB
Area Strategy	Should recognise distinctive neighbourhoods
	Development should be phased to the end of the plan period
	<ul> <li>Level of growth proposed is the most that Bradford can</li> </ul>
· ·	withstand
	<ul> <li>Housing and employment allocations at Bradford on Avon</li> </ul>
	should be increased
	Should identify another site in BoA to deliver the residual
	housing requirement
	<ul> <li>Cycle path between BoA and Holt should be provided</li> </ul>
	Kingston Farm:
	<ul> <li>Employment element is exaggerated</li> </ul>
	<ul> <li>Benefits of existing large trees should be recognised</li> </ul>
	<ul> <li>Will lead to urbanisation of Holt side of BoA</li> </ul>
	<ul> <li>Development should have little parking provision</li> </ul>

	<ul> <li>2-3ha employment land not likely to be delivered: 5,000 sq m will be delivered</li> </ul>
	<ul> <li>Green space shown adjacent to the site is not available</li> </ul>
	and will remain in agricultural use
	<ul> <li>Statement about master planning process is unclear</li> </ul>
	<ul> <li>Not the most appropriate site when considered against</li> </ul>
	alternatives
	<ul> <li>Site does not have capacity to deliver the entire</li> </ul>
	proposal
	<ul> <li>Ecology, archaeology/cultural heritage, and landscape</li> </ul>
	are constraints
	<ul> <li>SA should be revisited</li> </ul>
	Alternative sites:
	<ul> <li>Land North of Holt Road</li> </ul>
	<ul> <li>Land at Bradford on Avon Golf Course</li> </ul>
	Air quality, transport and Historic Core Zone:
	<ul> <li>More serious consideration of AQMA needed</li> </ul>
	<ul> <li>Question as to how congestion will be reduced</li> </ul>
	<ul> <li>Question as to how Historic Core Zone will be delivered</li> </ul>
	<ul> <li>Concern at impact of Bath HGV ban</li> </ul>
	Bath and Bradford on Avon SAC
	<ul> <li>Policies for community area and environmental</li> </ul>
	protection need to be rewritten in light of SAC
	<ul> <li>Need Appropriate Assessment of Kingston Farm site</li> </ul>
	Holt area of opportunity: an alternative area of opportunity
	should be identified.
Calne Area Strategy	Calne Town Council support the strategy for the area
	Housing requirement should be increased
	<ul> <li>Housing target should allow for additional development where there is a shortfall elsewhere</li> </ul>
	<ul> <li>Settlement boundary of Calne should be redefined to include land at Castle Walk</li> </ul>
	Should identify site for care and older people's accommodation
	Strategic allocation should be identified in Calne
	Suggested allocations:
	Land to north east including land at High Penn
	<ul> <li>Land off Oxford Road</li> </ul>
	Support omission of land east of Chippenham as strategic site –
	should become rural buffer
	Should recognise that development outside B1/B2/B8 can
	provide significant number of jobs
	<ul> <li>Qualitative need for convenience retail in Calne</li> </ul>
	<ul> <li>Support for references to AONB</li> </ul>
	Aspirations to create entertainment and recreational facilities
	<ul> <li>Development should be high quality design</li> </ul>
	Support for not bringing forward eastern distributor road
Chippenham Area	Housing requirement:
Strategy	Maximum housing requirement should be 1500
	Referendum should be taken on levels of development
	Should be made clear that there will be a need to
	release Greenfield land to deliver houses outside

#### Chippenham

 Insufficient housing requirement in Chippenham Community Area

#### Spatial Strategy:

- Too much emphasis given to early employment delivery
- Should not require employment development in advance of residential.
- Spatial Strategy is not ambitious enough to attract inward investment and does not provide a flexible supply of strategic employment sites
- Should refer to potential impacts of development at Chippenham on Lacock
- Lack of consultation with Lacock Parish Council regarding proposals for Chippenham
- Grittleton should be identified as a small settlement

#### Sites:

- o Showell Farm Employment Site isn't viable
- East Chippenham Site should be allocated for 800 dwellings.
- Object to inclusion of 18ha employment land at Showell Farm and 800 dwellings at Patterdown/Rowden
- o Alternative sites (e.g. J17) dismissed too easily
- Support for allocation of North Chippenham and Rawlings Green sites. Remaining 800 dwellings should be identified through NP/Chippenham masterplan.
- Object to allocation of North Chippenham and impact on Birds Marsh Wood
- Support for non-identification of East Chippenham site should be designated as local Green Space
- Rawlings Green proposals not supported by local community
- Constraints to development of Rawlings Green currently unknown.
- Hunters Moon site should be reinstated as an allocation for employment and 650 houses.
- Saltersford Lane should be reinstated.
- o Barrow Farm should be allocated for mixed use.
- Forest Farm should be allocated for 2.5ha employment land and 700 houses.
- Suitable alternatives for provision of employment sites have not been suitably considered.
- Support South Chippenham allocation.
- CP10 does not comply with NPPF. Need more jobs around the town centre rather than near the A350.
- o Changes should be made to indicative greenspace areas for Rawlings Green.
- Change land identified by Natural England as being more visually prominent to indicative greenspace at South West Strategic Site.
- Land at SW Abbeyfield School is non-strategic site and should not be allocated in Core Strategy.

	<ul> <li>Development is allocated in Rowden Conservation Area, which is an open rural landscape.</li> </ul>
	Brownfield opportunities:
	<ul> <li>Lack of consideration of brownfield opportunities, contrary to NPPF</li> </ul>
	o Langley Park is not being used to full potential
	o SHLAA notes potential for 545 houses
	Proposed development is contrary to NPPF
	Chippenham Central Area of Opportunity
	<ul> <li>Support for inclusion of Langley Park/Hathaway Park in CP9</li> </ul>
	<ul> <li>Support for Chippenham Central Area Masterplan</li> </ul>
	<ul> <li>Wiltshire College Site should be identified as part of</li> </ul>
	Central Area of Opportunity
	<ul> <li>Support for inclusion of Bath Road Car Park/Bridge</li> </ul>
	Centre site; request for council to consider other uses
	such as A3
	Transport Strategy
	<ul> <li>Concern over lack of transport strategy to inform Core</li> </ul>
	Strategy – more detailed transport strategy needed for
	Chippenham
Corsham Area	<ul> <li>Chippenham South East Site is not properly referenced in the</li> </ul>
Strategy	text: numbers and text for Cosham Community Area therefore
	misleading
	Need to maintain open countryside between Corsham and
	Chippenham
	Policy should provide greater scope for permitting development
	outside settlement boundaries
	MoD land & alternative sites:
	ha employment land
	Policy should provide greater control over
	redevelopment of existing employment sites, including MOD land
	<ul> <li>Support for policies in relation to Copenacre. Town</li> </ul>
	Council would support a larger footprint on Copenacre
	and Rudloe site.
	<ul> <li>Question deletion of strategic site on land west of</li> </ul>
	Corsham.
	No evidence of deliverability of future employment
	provision – risk existing employment sites are lost to
	housing
	o Fails to identify sufficient specific employment sites
	o Fails to deliver development on MoD land
	o 10 ha Sands Quarry site should be allocated for
	employment, green buffer and recreation
	<ul> <li>Land to north and east of Leafield Industrial Estate</li> </ul>
	should be allocated in the plan
	Transport:
	<ul> <li>Support re-opening station; should be top priority</li> </ul>
	<ul> <li>Support strategy to improve worker retention and</li> </ul>
L	The state of the s

<u></u>	
Devizes Area	emphasis on improved facilities and services  Not correct that transport is generally poor: A4 should be recognised as positive feature  Corsham Cycle network and greencorridor between Chippenham and Corsham not likely to be delivered  Qualitative need for additional convenience retail floorspace in Corsham in line with NPPF  IDP does not provide breakdown of costs or who will pay, TP8 lacks coherence and has not been discussed with the community – will not provide basis to negotiate with developers  Support taking account of Bath and Bradford-on-Avon SAC.
Strategy	<ul> <li>Support for aspiration for railway station</li> <li>Support for production of Devizes Town Transport Strategy</li> <li>Support for retention of existing development boundaries</li> <li>Housing:         <ul> <li>Housing target should be increased</li> <li>Increase housing requirement in Devizes rural area</li> <li>Allocate land at Coate Bridge for mixed use including 350 homes</li> <li>Allocate land at Lay Wood/Horton Road for 350 homes</li> <li>Lack of 5 year housing land supply in Eastern HMA</li> <li>A petition was received with over 250 signatures requesting that the council ensure that land along Coate Road adjacent to Windsor Drive, Devizes is not included as a strategic site in the core strategy and will not be given permission for housing development</li> </ul> </li> </ul>
	<ul> <li>Wider heritage assets in Devizes than the Wharf and Assize courts</li> <li>Devizes Hospital should no longer be viewed as potential housing site</li> <li>Status of Worton</li> <li>Objection to Horton Road employment allocation</li> <li>Prioritise addressing traffic congestion, reducing air pollution and need for improved health care</li> <li>Description of Devizes is overly optimistic.</li> <li>Concerns about the amount of consultation with villages and traffic impact through Potterne.</li> </ul>
Malmesbury Area Strategy	<ul> <li>Definition of Malmesbury Community Area is required – currently separate boundaries for Malmesbury, Burton Hill and Cowbridge and Foxley Road</li> <li>Housing:         <ul> <li>Housing numbers should not be set or delivered until school places addressed</li> <li>Housing targets should be increased to meet housing need and needs of employers</li> <li>Other centres have a lower percentage increase in housing</li> <li>No evidence to support increased amount of housing for Malmesbury</li> <li>No clear evidence as to how allocation of housing has</li> </ul> </li> </ul>

been derived

- Should make it clear that delivery outside the main town will involve release of Greenfield sites
- Comments on previous consultations have not been taken into account
- Land at Park Road should be allocated for development.
- Employment and retail:
  - Employment allocation at the Garden Centre should be removed
  - CP13 should refer to need for a town centre study to determine appropriate scale of supermarket development.
  - Malmesbury does not need another supermarket. 0
- Transport:
  - Need to consider transport impacts and increased pressure on M4 J17
  - No mention of how public transport might be improved
- Villages:
  - Should allow small sites on the edge of Oaksey/large villages
  - Support designation of Oaksey and Great Somerford as Large Villages

## Marlborough Area

#### AONB:

- Should make clear that AONB is starting point of any strategy in the community area
- Concerns that AONB has not influenced level and location of proposed development
- River network:
  - Importance of River Kennet should be stated
  - 'Sustainability' should be defined in relation to River Kennet and Og Rivers
  - Serious concerns over environmental capacity of Marlborough environment, particularly upper River Kennet
- Salisbury Road strategic site allocation:
  - Support for allocation
  - Development template overly prescriptive and premature
  - Number of houses should be reduced and provision for a hotel included
  - Objections to the allocation due to lack of hotel, affect on ground water supply, lack of school places, increased traffic and air pollution, and impact on Savernake Forest SSSI and ecology within site
- Air pollution problem should be recognised
- Housing should be phased: infrastructure and employment should come forward before residential
- Importance of tourism should be recognised
- Term 'Outstanding Universal Value' is confusing
- Development should be promoted in sustainable locations, with consideration to impacts upon M4

### Strategy

	Should acknowledge presence of bats in disused rail tunnel.
Melksham Area	Concern at scale of development: infrastructure will be
Strategy	overwhelmed
Strategy	Appears to be preference for development on green field sites
	to the east of Melksham
	Rural buffer between Melksham and Bowerhill should be
	protected/made available as Community Park
	Potential impact of development on Lacock should be
	recognised
	<ul> <li>Should specify that non-strategic development will consist of 2-3</li> </ul>
	sites of no more than 30-35 housing units
	<ul> <li>Should recognise role of town and parish councils in delivering</li> </ul>
	CP15
	<ul> <li>Should be no further large scale building in Bowerhill area.</li> </ul>
	Bowerhill Sports Field should be retained
	<ul> <li>CP15 does not cover economic and social needs of the villages:</li> </ul>
	rural industry in the villages should be encouraged
	Cycle linkages needed between town centre and surrounding
	villages
	<ul> <li>Support for protection of historic environment of the Spa:</li> </ul>
	should be designated as a Conservation Area
	<ul> <li>Listed building in the villages should also be protected and enhanced</li> </ul>
	Wiltshire Council need to pro-actively secure a better rail service
	<ul> <li>Housing and employment development will not in itself improve</li> </ul>
	the retail area
	Core Strategy should protect riverside amenity from tree-felling
	Settlement hierarchy and villages:
	<ul> <li>Seend, Seend Cleeve, Inmarsh and Sells Green should be</li> </ul>
	treated as one settlement.
	o Bowerhill should be classified as a separate settlement
	(Large Village or Local Strategic Centre)
	o Inaccuracies in settlement strategy assessment of Seend
	Cleeve
	<ul> <li>Great Hinton should be identified as a Small Village</li> <li>Land north of Shaw and Whitley presents opportunity to</li> </ul>
	deliver housing and community facilities
	Remainder sites for the villages should be agreed
	through Neighbourhood Plans, not just windfall sites
	o Should allow for more retail in Bowerhill village
	Employment:
	<ul> <li>Support for regeneration of Bowerhill Industrial Estate</li> </ul>
	<ul> <li>Disagreement with use of old running track land for</li> </ul>
	waste transfer station
	<ul> <li>A Business Development Brief should be prepared to</li> </ul>
	determine type and extent of employment required
	<ul> <li>Upside Park should be excluded from list of Principal</li> </ul>
	Employment Areas
	<ul> <li>Bowerhill employment area serves a wider area than</li> </ul>
	Melksham town
	<ul> <li>Need car/lorry park at Bowerhill IE</li> </ul>

		<ul> <li>Heritage centre could be provided on employment land at Bowerhill</li> </ul>
		growth of Melksham and provide the certainty that
		employers would want in seeking to locate to areas
		within Wiltshire. Insufficient employment land is
		identified at Melksham. Land south of Western Way
		should be allocated for 7ha of mixed use employment
		land.
	<ul><li>Lack</li></ul>	of strategic site:
		<ul> <li>Concern that lack of strategic site will leave town vulnerable to developers</li> </ul>
		<ul> <li>Strong objection to lack of strategic site: uncertainty</li> </ul>
		around NPs, NPPF supports preparation of single Local
		Plan, inconsistent approach to allocations, removal of
		allocation has not been subject to SA/SEA
		o Land north of the A3102 should be allocated for 100
		homes, and land south of the existing development east
		of Melksham for 200 homes (Melksham Town Council)
		o Land east of Melksham should be allocated for 400-450
		dwellings
		ed up thinking is required between Melksham and
		vbridge community areas
		rs on Melksham map need to be rectified
	• Hou	sing and employment numbers:
		<ul> <li>Housing numbers for rural settlements are too low</li> </ul>
		<ul> <li>Housing numbers for whole community area should be</li> </ul>
		increased
		<ul> <li>Too many houses are allocated in the community area</li> </ul>
		O Housing numbers for Melksham town should be
		decreased, and numbers for villages increased
		<ul> <li>Figures for Bowerhill should not be included with</li> </ul>
		Melksham town
		al project offers opportunity to provide walking and cycling
	- Total	to the villages
Mere Area Strategy	100000	eral support for CP17
Pewsey Area	• AON	
Strategy		No alternative approach has been suggested within the
		Core Strategy for land inside the AONB
		O Questions as to how level of development will be
		achieved without harm to the AONB – justification for
		level of development needs to be explained
		Within AONB development should be prioritised on
		brownfield land first, within the settlement boundary
		port for settlement strategy but housing allocation for
		munity area is insufficient
		eased recreational pressure should be avoided where it may
	-	act on European habitats and species
	• Hou	sing:
		O Housing numbers are too high
		o CP18 should make it clear that delivery of housing will

	involve Greenfield sites
	<ul> <li>Should provide guidance on level of growth expected in Pewsey</li> </ul>
	<ul> <li>Majority of dwellings in the community area should be</li> </ul>
	focussed on Pewsey
	<ul> <li>Housing development in Pewsey should be phased for</li> </ul>
	delivery throughout the plan period
	<ul> <li>CP18 should allocate a strategic site at Pewsey</li> </ul>
	<ul> <li>Pewsey currently delivers insufficient housing</li> </ul>
	Support identification of Burbage as a Large Village
Royal Wootton	West of Swindon:
Bassett and	<ul> <li>Strategic sites should be allocated at Washpool,</li> </ul>
Cricklade Area	Ridgeway Farm, Marsh Farm
Strategy	<ul> <li>Development should be permitted to the west of</li> </ul>
	Swindon due to need for Swindon to expand
	<ul> <li>Failure of Wiltshire and Swindon to work together on</li> </ul>
	this issue
	Need for joint EiP for Wiltshire and Swindon
	RSS is still part of development plan
	Opposition to development west of Swindon due to
	need to preserve identity of settlements
	Should bring back rural buffer     Strategie site should be allegated at Brunard's Hill
	Strategic site should be allocated at Brynard's Hill     Strategic site about he allocated at land court of Weatter
	<ul> <li>Strategic site should be allocated at land south of Wootton Bassett</li> </ul>
	<ul> <li>Support for no strategic housing allocation in the area</li> <li>Support for statement about J16</li> </ul>
	Housing requirement should be increased:
	o Inadequate to meet need
	o Should use RSS
	CS does not adequately account for likely delivery
	problems
	Lyneham will create need
	<ul> <li>Need for contingency/flexibility</li> </ul>
	o Moredon Bridge development reflects Swindon's need
	and should not come out of Wiltshire housing figures
	<ul> <li>Not enough houses for likely jobs</li> </ul>
	Transport:
	<ul> <li>J16 congestion problems: should developers pay for</li> </ul>
	improvements? Will improvements adversely impact on
	local roads
	<ul> <li>HGVs and traffic are major issues in Cricklade and</li> </ul>
	Purton
	<ul> <li>Need to promote sustainable transport</li> </ul>
	RAF Lyneham:
	<ul> <li>Question as to whether village boundary review will be</li> </ul>
	separate to any masterplan for the base
	<ul> <li>Development at Lyneham could have negative impact</li> </ul>
	on roads
	Jobs should be created before more houses are built
	<ul> <li>Proposed changes to settlement hierarchy status of Cricklade,</li> </ul>

	Purton, Lyneham and Lydiard Millicent
	<ul> <li>Sustainability is not clearly defined</li> </ul>
	<ul> <li>Brownfield should be prioritised over Greenfield</li> </ul>
	<ul> <li>Retail assessment should be qualitative as well as quantitative</li> </ul>
	<ul> <li>Should be more than 30% affordable housing</li> </ul>
	<ul> <li>Question as to why major development should support changes</li> </ul>
	to infrastructure
	Question as to how development will fund infrastructure
	Question as to now development will fund infrastructure
Salisbury Area	Padical transport entions as identified by the Inspector pand to
· ·	Radical transport options as identified by the Inspector need to  he added (agreed)
Strategy	be added (agreed)
	Too much development in Laverstock and Ford Parish
	<ul> <li>Core Policy 23 should be deleted</li> </ul>
	<ul> <li>Plan period should be extended</li> </ul>
	<ul> <li>Support for Maltings/CCP redevelopment</li> </ul>
Southern Wiltshire	Developers proposing to connect to a Waste Water Treatment
Area Strategy	Works will need to check with the utilities provider that there is
	adequate capacity.
	Bullet points not in line with the Habitats Directive, which
	indicates that development must avoid damage to, and not
	adversely affect, Special Areas of Conservation and the habitats,
	species and processes which maintain their integrity. Suggested
	changes to wording to reflect Habitats Directive and to add
	reference to Salisbury Plain.
	<ul> <li>Core policies 24 and 25: concerned at change of policy number</li> </ul>
	between Core Strategies and would like to know if new policies
	can be amended during this consultation.
Tidworth Area	Housing requirement:
Strategy	<ul> <li>Housing development should be phased for delivery</li> </ul>
	throughout the plan period
	<ul> <li>Requirement is not commensurate with settlement size</li> </ul>
	or function: services, facilities and employment
	opportunities at Tidworth and Ludgershall are extremely
	limited
	as part of supply
	Support for allocation at Drummond Park. Should be a  development to apple to a page div. A
	development template at appendix A.
	Proposals do not strictly follow the requirement of the Habitats
	Directive
	Development of Brownfield should consider risks from
	contamination to ground and surface waters
	<ul> <li>Support for references to AONB</li> </ul>
	<ul> <li>Support for solutions to limit impact of development on A303</li> </ul>
	<ul> <li>Issues and considerations not in line with Habitats Directive:</li> </ul>
	increased recreational pressure should be avoided where it may
	impact on European protected habitats and species
	<ul> <li>Need to consider foul and surface water disposal and a water</li> </ul>
	cycle study as part of infrastructure requirements
Tisbury Area	Support for balance of housing directed towards Tisbury
1130ULY ALEA	- Support for balance of flousing directed towards fishury

Ctrotogri	Community Area
Strategy	Community Area
	Hindon could potentially accommodate a higher level of planned     housing growth than Foundation.
	housing growth than Fovant or Ludwell
	Housing allocation should be identified at Hindon, and could include land adjacent to Fact Street.
Troubridge Area	include land adjacent to East Street.
Trowbridge Area Strategy	Trowbridge town centre:     Town centre better suited to community starter beusing.
Strategy	<ul> <li>Town centre better suited to community starter housing not another supermarket.</li> </ul>
	<ul> <li>Does not sufficiently prioritise town centre. No</li> </ul>
	assurance central area will be delivered before Ashton
	Park.
	<ul> <li>Support objective for proposed urban extension to be</li> </ul>
	fully integrated with the town centre.
	<ul> <li>Inconsistent with NPPF – proposing specific residential</li> </ul>
	and office uses for Bowyers site could prevent
	development coming forward. Retail and leisure led
	development is the most appropriate on the site.
	<ul> <li>Area described as the 'town centre' needs to be</li> </ul>
	properly defined.
	<ul> <li>No long term vision for Canal Road Estate. Need to improve</li> </ul>
	B3105.
	<ul> <li>Too much development planned on Greenfield land: Brownfield</li> </ul>
	should be developed first for housing not commercial uses.
	<ul> <li>Insufficient emphasis on giving priority to brown field sites,</li> </ul>
	which leaves vulnerable to a redundant and crumbling town
	centre.
	Housing and employment figures are excessive and out of
	<ul> <li>balance.</li> <li>Some concerns with traffic on B3105 and overall level of</li> </ul>
	development.
	<ul> <li>More proactive approach needed to stop heavy goods vehicle</li> </ul>
	using Trowbridge as a route to M4.
	<ul> <li>Suggestions for rewording of the vision statement within the</li> </ul>
	area strategy.
	CP28 should include reference to aspirations to create leisure,
	entertainment and cultural faculties.
	There is qualitative need for additional convenience floor space
	in Trowbridge in line with NPPF requirements.
	Strategic site:  Should consider impact on strategic road network.
	<ul> <li>Should consider impact on strategic road network,</li> </ul>
	particularly A36  o Should change map to reflect correct site area.
	<ul> <li>Should change map to reflect correct site area.</li> <li>Proposals are unsound and need to be reduced in scale</li> </ul>
	to reflect the existing and proposed highways
	infrastructure capacity.
	<ul> <li>The identification of a single strategic allocation, with</li> </ul>
	various constraints, is not the most appropriate
	strategy: would be better to identify a number of
	smaller strategic sites on the edge of the urban area,
	such as land at Church Lane.
	<ul> <li>Bowyers site presents best opportunity for district heating</li> </ul>

system and is ideally located for retail and leisure development.

- Ecology:
  - Important wood south east of Trowbridge to be preserved.
  - Trowbridge needs trees.
- Settlement hierarchy:
  - o Yarnbrook should not be re-classed as a small village but remain a settlement in the countryside.
  - Support for identification of Southwick as a large village.
  - Welcome fact that Hilperton is now classed as a large village, thereby reinstating Village Policy Limit.
  - West Ashton would like to remain a small village however would like to retain its existing policy limit.
  - Strategic role given to Trowbridge is supported.

### Warminster Area Strategy

- Issues and considerations not in line with Habitats Directive: increased recreational pressure should be avoided where it may impact on all European protected habitats and species. Benefits to one species should not be balanced against adverse effects on others.
- Reference to fire station and ambulance service centre should be amended
- Support for proposed mix of development
- Alarmed by proposed development
- Need to consider traffic impacts on A36
- Question as to why land at 44-48 Bath Road is not included in the strategic site area
- Not enough jobs to support new housing
- Not enough school spaces and amenities
- Infrastructure will struggle
- Chapmanslade should be identified as a Small Village (not a Large Village)
- Any development is likely to add to climate change
- There should be more specific criteria associated with the development
- Support location of strategic site and flexible approach to meeting Phosphates Management Plan
- Master planning approach will build in delay
- Flexible approach should be taken to affordable housing
- Direct relationship between employment and housing should be built into CP31
- Housing allocation should be increased and SA re-visited. Land to east of Dene should be identified for 320 dwellings.
- Object to strategic site on western side of town. Should remove strategic site and leave allocation to NP or site allocations DPD. Alternatively, lower the number of houses.
- Overall level of housing for Warminster is insufficient.
- Promotion of land which was previously white belt, before becoming green belt.
- Land north of Grovelands Way should be included as part of the urban extension.

### 37

	<ul> <li>The West Wiltshire Urban Extension is capable of</li> </ul>
	accommodating a much higher number. The overall
	requirement for the site should be reassessed.
	<ul> <li>Land south of Bugley Barton Farm is not essential to the delivery</li> </ul>
	of the majority of the site.
Westbury Area	<ul><li>Housing:</li></ul>
Strategy	<ul> <li>Housing requirement for Westbury is too low to deliver</li> </ul>
	infrastructure requirements
	<ul> <li>Scale of housing growth should not be determined by</li> </ul>
	the need to balance the high level of housing in the past
	<ul> <li>Alternative sites promoted for allocation:</li> </ul>
	<ul> <li>Land to the East of Newtown (residential)</li> </ul>
	<ul> <li>North of Westbury (mixed-use)</li> </ul>
	<ul> <li>Land at Station Road allocation:</li> </ul>
	<ul> <li>Site will impact negatively on use of the lake for sailing</li> </ul>
	and angling
	<ul> <li>Site is capable of delivering 500 homes: this higher</li> </ul>
	number is necessary to deliver infrastructure
	requirements and public realm improvements
	<ul> <li>Site should be expanded to included associated land</li> </ul>
	<ul> <li>Access to the station is an issue for buses: could be dealt</li> </ul>
	with through the strategic site
	Employment:
	<ul> <li>Employment in Westbury should be considered in line</li> </ul>
	with Trowbridge
	Land at Mill Lane, Hawkeridge strategic site:
	Employment requirement for Westbury should be lower
	and Mill Lane, Hawkeridge site is unnecessary
	Enough employment land in Westbury and road     The street and the additional traffic from the street and the second
	network cannot accommodate additional traffic from
	proposed site
	Support inclusion of Mill Lane, Hawkeridge site  Landscape (environment)
	<ul> <li>Landscape/environment:</li> <li>Should be firm and robust protection for Wellhead</li> </ul>
	Valley
	<ul> <li>All species and habitats, not just Stone Curlews, should</li> </ul>
	be protected in vicinity of SPA/SAC to be in conformity
	with Habitats Directive
	Area unsuitable for development because of water
	supply and natural history concerns
	Areas of Green Belt should be identified around
	Westbury
	Lafarge Cement Site
	Lafarge site should retain rail sidings
	<ul> <li>Lafarge site should be designated as Principal</li> </ul>
	Employment Area
	<ul> <li>Only suitable use for Lafarge site is agricultural</li> </ul>
	Westbury Bypass
	Remove saved policy T1a, Westbury Bypass
	<ul> <li>Council's intentions regarding the bypass should be</li> </ul>
	made clear

	HGVs are a problem in Wesbury
Wilton Area	<ul> <li>Provide employment to cater for Wilton residents rather than</li> </ul>
Strategy	placing it in Salisbury
	<ul> <li>Need to reflect Habitats Directive which indicates that</li> </ul>
	development must avoid damage to, and not adversely affect,
	Special Areas of Conservation and the habitats, species and
	processes which maintain their integrity.
Delivering SO1:	Support for reference in para. 6.2 to 'targeting growth in the
CP34 – Additional	tourism sector' but text should be expanded.
employment land	<ul> <li>Salisbury Plain should be specified as a tourist attraction in para.</li> </ul>
	6.3.
	Need a new policy and key outcome which promotes
	browndfield sites in town centres as priority places for
	development.
	Need more emphasis on the need to develop brownfield sites
	before Greenfield. The council should maintain a list of all
	suitable brownfield sites.
	NPPF section on town centre vitality should be expressed in the
	Core Strategy: should promote Trowbridge town sites much
	more strongly.
	<ul> <li>Support for recognition that employment sites may come</li> </ul>
	forward which do not strictly meet policy but are of strategic
	significance.
	<ul> <li>Policy should recognise that employment sites not adjacent to</li> </ul>
	current boundaries may be needed.
	<ul> <li>Policy does not allow for land adjacent to market towns, and</li> </ul>
	thus potential Greenfield employment sites could be excluded.
	<ul> <li>Para. 6.13 is inconsistent with much of the CS and NPPF and</li> </ul>
	should be deleted.
	<ul> <li>Suggested changes to text of CP34:</li> </ul>
	<ul> <li>Need to clarify whether rural employment (criterion iii)</li> </ul>
	refers to type or location.
	<ul> <li>Criterion iv should be reworded to cover sites that are</li> </ul>
	able to demonstrate that they promote the move
	towards a higher-value economy
	<ul> <li>Criterion iv: 'are considered essential' is too narrow –</li> </ul>
	should replace with 'are considered beneficial'
	<ul> <li>Criterion relating to sites essential to wider strategic</li> </ul>
	interest (iv) is too ambiguous and should be removed.
	<ul> <li>Criterion v should be reworded to refer to the NPPF.</li> </ul>
•	<ul> <li>Criterion vii (relating to evidence that proposals are</li> </ul>
	required to benefit local economic and social needs) is
	unnecessary and adds significant restriction. Contrary to
	NPPF and principles of the Core Strategy.
	<ul> <li>Strongly recommended that criterion viii (relating to</li> </ul>
	strategic employment allocations) is removed
	<ul> <li>Criterion viii will be complex to implement through</li> </ul>
	development management: should only relate to sites
	of more than 1ha.
	<ul> <li>'Adequate infrastructure' (ix) does not go far enough</li> </ul>
	and needs to be expanded. Should include measures to

encourage public rail transport of both employees and freight.  O CP34 should make reference to AONB policy.  Wording of CP34 should be changed to stop developers putting forward repeated applications on land that has already been assessed and could undermine deliverability of strategic sites.  Revisions should be made to the policy wording to confirm that additional, unidentified land will not be released unless it is demonstrated that an existing employment or allocated site cannot meet the proposed need for employment land.  Revisions should be made to the policy wording to confirm that priority will be given to the delivery of sites specifically identified in the Area Strategies.  Effectiveness of CP34 could be improved by minor rewording to differentiate the types of development which will be permitted from the circumstances in which they will be supported.  Should clarify that employment land will only be supported outside the settlements in exceptional circumstances.  Policy lacks clarity: no definition of what 'within principal settlements' means as settlement boundaries reflect residential development and not economic development.  Given that much of the county do not have strategic allocations it is important that other policies allow for economic growth.  Need to support small businesses within the rural areas: this note seems somewhat reluctant and negative about the principle of this.  Intention of CP34 is broadly supported but wording of the policy is not effective as currently drafted.  Current drafting of CP34 is an improvement on earlier drafting.  Support for identification of five criteria to be satisfied by development outside settlements, particularly viii (relating to strategic employment sites currently drorfted.  Plan needs to recognise that employment opportunities extend in uses well beyond use classes 81, 82 and 88. Should follow the NPPP position on this.  Wiltshire Council should consult with other bodies such as Chambers of Commerce, Town Councils, as to what they consider to be th	_	<del>-</del>
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relocating employment sites where existing areas are not well connected.	employment sites	
connected.		
Employment sites are just as important within rural areas:		
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	The control of the co
	allowance should be made for suitable expansion of sites that
	may serve individual or groups of villages.
	Plan needs to recognise that employment opportunities extend
	in uses well beyond use classes B1, B2 and B8. Should follow the
	NPPF position on this.
	General support for CP35, but additional paragraph should be
	added to supporting text to require change of use applications
	to have regard to improving green infrastructure.
Delivering SO1:	<ul> <li>No mechanism for promoting brownfield sites outside the main</li> </ul>
CP36 – Economic	settlements. CP36 should be reworded to state that "where no
regeneration	appropriate brownfield sites are available or deliverable within
	the Principal Settlements, Market Towns and Local Service
	Centres, regeneration of other brownfield sites outside these
	settlements will be supported where the development is
	sustainable and the land is not of high environmental value".
	<ul> <li>Policy does not go far enough: Greenfield sites should not be</li> </ul>
	developed when brownfield sites are available.
	<ul> <li>Should there be reference to SPD/DPDs as well as</li> </ul>
	Neighbourhood Plans?
	<ul> <li>Reference to competition is not clear: regeneration can be</li> </ul>
	within town centres, in which case competition is good.
	<ul> <li>Identification of regeneration sites should not be limited to</li> </ul>
	urban areas.
	<ul> <li>Core Strategy does not sufficiently direct development to</li> </ul>
	brownfield sites and town centres:
	<ul> <li>Lack of proactive policies</li> </ul>
	<ul> <li>Doing nothing to promote town centres in line with the</li> </ul>
	NPPF
	<ul> <li>No focus on prioritising town centres over Greenfield</li> </ul>
	sites
	<ul> <li>No policies promoting offices in town centres</li> </ul>
	<ul> <li>Weak words such as 'support' instead of 'promote' or</li> </ul>
	'prioritise'
	<ul> <li>No policy on more high density office space in town</li> </ul>
	centres
	Request for:
	<ul> <li>Policy promoting brownfield sites in town centres</li> </ul>
	o Explicit expression of the NPPF emphasis on town centre
	vitality
	Stronger promotion of Trowbridge town sites
	o Policy promoting new offices and small scale
	employment in town centre sites
	o More emphasis on revitalising existing trading estates
	and redeveloping MOD sites.
	New policy that promotes brownfield sites in town centres as
Duli di GG1	priority places for development.
Delivering SO1:	Policy must not constrain sites on edge of settlements
CP37 – Military	particularly so consideration is given to future linkages to
establishments	existing town centres.
	CP37 is not justified or consistent with national policy.
	Requirement for all development to 'enhance the overall

	<ul> <li>character of the site' appears unrealistic.</li> <li>Applications for non-military development at MOD sites should be considered on their merits with consideration to other policies of the plan and national policies and initiatives.</li> <li>MOD sites should have been assessed in the same way all other potential sites were.</li> <li>Insufficient weight given to sustainability issues: redundant MOD sites should only be redeveloped where they meet NPPF criteria.</li> </ul>
Delivering SO1: CP38 – Retail and Leisure	<ul> <li>CS should define a Trowbridge Town Centre Boundary in line with NPPF requirements.</li> <li>Suitable sites should be allocated to meet full needs of retail and leisure uses.</li> <li>Secondary frontages and primary shopping areas should be identified on the Proposals Map, in line with NPPF.</li> <li>Requirement for retail impact assessment: <ul> <li>Unjustified.</li> <l>Inconsistent with inspector's conclusions on SWCS. Rephrase CP38 to make consistent with the SWCS threshold of 200 sqm gross.</l></ul></li> <li>Deviates from NPPF guidance.</li> <li>Will negatively impact on delivery of CP48 (supporting rural life).</li> </ul> <li>Recently approved supermarket extensions show that council will not enforce this policy.</li> <li>Document is inconsistent, too long, obscured by detail and objectives/aspirations not reflected in policies: e.g. no guidance in CP38 for enhancement of vitality or viability of town centres.</li> <li>Retail evidence base (GVA report) should be referenced.</li> <li>Proposed policy is welcomed, but is too late.</li> <li>No explanation as to how objective to regenerate the town centre shopping areas will be realised.</li> <li>More attention is needed to the approaches to the smaller Market Town centres and car parks – new policy wording suggested.</li>
Delivering SO1: CP39 - Tourist development  Delivering SO1: CP40 - Hotels, bed and breakfasts, guest houses and	<ul> <li>Support for recognition of the importance of the tourism industry to Wiltshire's economy, for the inclusion of a specific policy in relation to tourist development, and for the Council's 'target' which seeks to "increase and improve facilities for sustainable tourism".</li> <li>Text of CP39 should be amended to refer to 'improvements, alterations and extensions to existing attractions and tourist accommodation, and provision of new tourism facilities (where appropriate).</li> <li>Query whether a sequential assessment is necessary for all tourist proposals: would it be better to only require assessment for major proposals?</li> <li>Criteria (i) is not justified and against competition policy.</li> <li>Question as to whether restriction of competition is allowed.</li> <li>The first sentence of CP40 should be expanded to state that</li> </ul>

conference	proposals will be supported "through the sensitive extension,
facilities	upgrading and intensification of existing tourism
IdCIIICS	accommodation facilities".
Dalinaria - CO2, ta	
Delivering SO2: to	Need to define 'sustainability'.
address climate	Support for flexible mechanisms to address climate change, in
change	line with definition by Central Government.
	<ul> <li>Core Strategy is unsound because IDP does not mention issues</li> </ul>
	with water resources. Sections of the Core Strategy on climate
	change should make reference to water shortage, and there
	should be a commitment to 'sustainable' water abstraction.
	<ul> <li>Existing policy has failed to achieve a 'step change'.</li> </ul>
	<ul> <li>Policy should reflect findings of Sir John Harmen commission</li> </ul>
	once this reports back.
	<ul> <li>Concern that council is leaving it to others to develop large</li> </ul>
	renewable decentralised energy technologies.
	<ul> <li>Council should take pro-active lead on community energy and</li> </ul>
	low-carbon development solutions.
	Renewable Energy Strategy has failed.
	Should be clear mandate that no development takes place in
	areas of flood risk.
	Would like to see the council involving the community more in
	measures to alleviate climate change: e.g. protecting allotment
	sites and making new sites available, and protecting high grade
	agricultural land.
	Should be pro-active measures to reduce carbon emissions by
	using rail to move freight.
	Deeply concerned that further assessment is needed to
	determine whether ground conditions in Wiltshire may be
	vulnerable to climate change.
	Concern that not enough consultation has been done on this
	important subject.
Delivering SO2:	Support for principle of CP41.
CP41 – Sustainable	
construction and	Welcome that impact on viability will be taken into account.  No montion in policy of your of minuster recognition on the count.
low carbon energy	No mention in policy of use of rainwater recycling or re-use of
low carbon energy	grey water.
	Questions as to how the policy will be monitored and how
	conditions will be dealt with.
	Policy is more appropriate as part of a Development
	Management DPD: should be removed or simplified.
	<ul> <li>Policy should be redrafted in accordance with NPPF.</li> </ul>
	<ul> <li>Policy should be reworded to make it firmer – too flexible at</li> </ul>
	present.
	<ul> <li>Combined heat and power is not a low cost solution.</li> </ul>
	<ul> <li>CP41 does not reflect NPPF statement that climate change is a</li> </ul>
	key priority.
	Supporting off-site renewable energy does not address the
	needs of specific sites
	CP41 is unsound: not justified in terms of evidence base and
	whether it is appropriate when considered against reasonable
	alternatives, and threatens delivery of affordable housing.
	and the second desired of an arrow desired.

- CP41: first section climate change adaptation:
  - Trees have additional benefits for climate change which should be recognised.
  - o 'Encourage' is too weak and needs to be strengthened.
  - Words 'as practicable' should be removed, and policy should state "This should be achieved by use of most if not all of the following means.."
- CP41: second section sustainable construction:
  - Inclusion of specific levels of the Code for Sustainable Homes is overly prescriptive and not flexible, and will undermine a 'fabric first' philosophy.
  - Remove specific CSH levels and target dates and replace with general wording to seek best levels of sustainability on a site specific basis.
  - Energy and sustainability more appropriately controlled by Building Regulations.
  - No technical assessment has been undertaken to demonstrate that policy is deliverable or viable.
  - Question the need to exceed Building Regulations in terms of energy reduction.
  - Should amend policy to require sustainable design and construction in accordance with future changes to Building Regulations.
  - Core Strategy should not impose mandatory requirements for CSH
  - Insufficient regard to the ability of smaller sites to achieve CSH requirements.
  - Locally specific carbon targets are inconsistent with the NPPF.
- CP41: third section existing buildings
  - Unclear whether retrofitting at whole street or neighbourhood level will be the responsibility of the developer or the council.
  - Not sure why building integrated renewable or low carbon technologies are below remote low carbon across the board.
- CP41: fourth section renewable and low-carbon energy
  - Policy needs to be flexible rather than imposing zerocarbon standards from 2013 for developments of over 500 homes.
  - Target for developments over 500 units to be zero carbon by 2013 is extremely ambitious and basis for this target is unclear.
  - No evidence as to why zero carbon by 2013 for 500+ units is required or justified in Wiltshire.
  - Zero carbon target should be reconsidered in light of the NPPF.
  - No justification for requirement to submit a Sustainable Energy Strategy.
  - Viability of development should be considered.
  - Policy will impact on viability and delivery of affordable

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	housing.
	<ul> <li>Threshold for major development to meet zero-carbon</li> </ul>
	standards should be much lower at 200-250 units.
Delivering SO2:	Support for CP42.
CP42 – Standalone	<ul> <li>Support for reference to AONB locations and settings.</li> </ul>
renewable energy	Current policies for renewable energy provision have failed –
installations	e.g. not delivered through ESCo's and fail community payback
	opportunity
	Policy should include minimum distance threshold of 2,000
	meters from wind turbines to dwellings.
	Policy should include criterion to protect Best and Most
	Versatile Land for food production: loss of agricultural land to
	energy crops has not been considered.
	Need to clarify that some renewable energy technologies
	require additional permissions over and above planning.
	Performance measure should equal 376 MW.
	Progress in Wiltshire to deliver renewable energy needs to be
	speeded up.
Delivering SO3:	The affordable housing target should be 50%, not 40%, on sites
CP43 – Providing	of 5 or more dwellings.
affordable homes	Strategy should seek to secure the maximum level of affordable
	housing (utilising 40% as a target), whilst taking into account
	individual site costs, the availability of public subsidy, S.106
	requirements and other scheme costs.
	Affordable Housing Viability assessment is flawed not least due
	to lack of developer involvement and no true examples. 40%
	relates to numbers but means area in the study, thus even
	assuming all of site is developable land it should be nearer 30%.
	<ul> <li>Open book viability assessments are most appropriate</li> </ul>
	mechanism to decide affordable housing level. More
	information is required on any approach to open book exercises.
	This should include information on acceptable profit margins.
	Private landlords, Parish Councils and any other groups should
	be able to provide affordable housing. Limiting it to registered
	providers means local people lose out due to regulations and
- 11	bureaucracy and does accord with localism.
Delivering SO3:	Restriction to 10 dwellings on exception sites appears
CP44 – Rural	unnecessary.
exceptions sites	Cross subsidy should be removed. Concern is expressed cross
	subsidy will become the norm, rather than the exception, and
	increase landowners' expectations of the value of such sites,
	resulting in cross subsidy being required. Tenure mix should be
Dolivering CO2:	provided within an affordable housing SPD.
Delivering SO3: CP45 – Meeting	The type and mix of accommodation should be determined by
Wiltshire's housing	the development industry.
needs	Core Policy 45 should allow greater flexibility for viability. The
inecus	policy should also consider market demand.
	Housing requirement does not adequately consider the
	supporting evidence. An alternative model should be employed
L	11 5

	which draws upon other variables.
	<ul> <li>Policy approach will stifle delivery and as a consequence put market housing prices up. The delivery of more homes will help make homes more affordable.</li> </ul>
Delivering SO3: CP46 – Meeting the needs of Wiltshire's vulnerable and older people	Extra care homes should not need to provide affordable homes.
Delivering SO3: CP47 – Meeting the needs of Gypsies and Travellers	<ul> <li>Target should be expressed as part of the overall housing figure and not identified separately. Temporary permissions should be taken into account</li> <li>Use of the Housing Market Area as a basis for targets is unclear. Provision should be sought on strategic sites (1% of total suggested). Sites should contribute to local infrastructure and services through Section 106.</li> <li>There is no essential need to locate Travellers in the countryside therefore should be located close to possible places of work and local facilities.</li> <li>Policy fails to define who qualifies as a Gypsy or Traveller.</li> </ul>
Delivering SO4: helping to build resilient communities	<ul> <li>By allocating only limited development in rural areas, many villages will experience population loss, continued outcommuting, loss of local services and businesses and a lack of affordable housing</li> <li>Need to plan for provision of emergency service facilities and infrastructure, meeting halls and places of worship</li> </ul>
Delivering SO4: CP48 – Supporting rural life	<ul> <li>Should not be restricted to agricultural or redundant buildings, all rural buildings should be considered in the policy without reference to 'redundant' or 'architectural merit'.</li> <li>NPPF demands a comprehensive and suitably flexible regime for the preference for re-use of existing rural buildings and previously developed land.</li> <li>Buildings often need significant re-building particularly as part of conversion works to meet building regs.</li> <li>The wording of the first section of this policy is inadequate to protect the countryside from inappropriate development.</li> </ul>
Delivering SO4: CP49 – Protection of services and community facilities	<ul> <li>No mention in Core Policy 49 of protecting community facilities in urban areas, only rural areas.</li> <li>Need greater support for village shops and post offices and community ownership-led enterprise. The community ownership section of the policy needs to make clear local councils will be encouraged to set up local shops.</li> <li>Buildings which become vacant as a result of relocation should be treated as any other building for which planning permission is sought.</li> </ul>

	<ul> <li>Simply having a policy to resist market forces will not benefit the remaining facilities and will cause them to dilapidate; many pubs face closure unless they can significantly increase their trade.</li> </ul>
Delivering SO5: overarching comments	<ul> <li>No mention of the Water Framework Directive. Key outcomes need to be included to protect and improve the quality and quantity of water within the water sources.</li> <li>The River Avon at Chippenham is a sustainable asset for the area and should be protected through a landscape scale approach.</li> </ul>
Delivering SO5: CP50 – Biodiversity and geodiversity	<ul> <li>Support for national and Wiltshire Biodiversity Action Plans.</li> <li>Welcome the opportunity to enhance biodiversity through planning and development.</li> <li>Policy does not refer to Sites of Scientific Interest.</li> <li>Policy only refers to protection of certain European sites, not all sites.</li> <li>Suggested amendment to policy wording in relation to Salisbury Plain and New Forest National Park SPAs.</li> <li>Conservation credits: policy needs expansion in relation to biodiversity off-setting and provision of green infrastructure on and off-site, and the creation of 'receptor sites'.</li> <li>Strengthen the requirement for ecological enhancement: policy must address the need to preserve, restore or re-create priority habitats and the necessity of cross local authority working to be sufficiently robust.</li> <li>Policy is too detailed and would be more appropriate as part of a Development Management DPD.</li> <li>Developer contributions should be proportionate to the impact and, if secured through a planning obligation / agreement, it must meet the tests of the CIL Regulations 2010.</li> </ul>
Delivering SO5: CP51 – Landscape	<ul> <li>Support for references to AONBs, their management plans and their setting.</li> <li>Agree that landscape plans have an important role to play in planning.</li> <li>There should be protection of agricultural land for food production.</li> <li>Need to protect against coalescence: criterion (iii) of CP51 is weak and should be strengthened.</li> <li>Need to strengthen wording:         <ul> <li>Additional point should be added relating to 'landscapes, green spaces and landscape features that make a valuable contribution to the character and</li> </ul> </li> </ul>

amenity of a settlement'.

- Concern that policy only requires aspects of landscape character to be 'considered': should be 'conserved and enhanced'.
- Concern that target to 'minimise impact' is negative outcome, implying damage is acceptable.
- o First paragraph is too weak as a policy statement.
- The reference to 'and any other relevant assessments and studies' is too imprecise and does not relate to the evidence base: it should be deleted.
- Policy is too detailed and would be more appropriate as part of a Development Management DPD.
- Policy is not in conformity with NPPF: does not set out criteria against which proposals for any development can be judged, and instead just acts as a checklist.
- Protection of AONBs:
  - Natural England is very concerned that the council has not demonstrated that it has adequately considered the impacts on designated landscapes in writing its policies.
  - Question as to how the council is going to protect AONBs.

#### Delivering SO5: CP52 – Green infrastructure

- General support including support from Bath and North East Somerset Council and support from Crest and Redcliffe.
- Would like to see stronger protection of hedgerows.
- Wording should be strengthened: developers should need to do more than identify opportunities, and the word 'unavoidable' in paragraph 3 of the policy is too subjective.
- Assessment / enhancement of offsite GI:
  - Assessment of existing GI should be limited to 'on site'
     GI and not 'around the site'.
  - The policy should not seek to require developers to retain and enhance off-site land.
- Policy is too detailed and would be more appropriate as part of a Development Management DPD.
- The NPPF requires planning policies to be based on an up-todate assessment of the need for open space, sport and recreation facilities and opportunities for new provision.
- Natural England urge the council to develop Wiltshire Open
   Space Standards and the Wiltshire Green Infrastructure Strategy as a matter of priority.
- A green belt should be identified to prevent the coalescence of Swindon and villages to the west of Swindon.
- A full explanation of the term 'green infrastructure' is needed at the beginning of this section and in the glossary.

Delivering SO5:	<ul> <li>Support for CP53 and the restoration of the Wilts &amp; Berks Canal</li> </ul>
CP53 – Canals	and safeguarding of the historic route.
	Role of canal towpath as a sustainable transport route should be
	recognised.
	<ul> <li>Saved policies for K&amp;A are out of date: new policy should be</li> </ul>
	based on Town and Country Planning Association guidance on
	Inland Waterways.
	·
	Concerned to ensure that where the alignment results in the
	loss of an existing community facility or a site for a planned new
	facility, there will be a guarantee that this facility will be
	replaced elsewhere and the community will not be worse off
	financially as a result.
	Significant concerns exist over conflicts between the different
	users of the Kennet and Avon canal. Mention should be made to
	balance the needs of different users and to coordinate this
	policy with other authorities through which the canal travels.
Delivering SO5:	General support
CP54 – Cotswold	
Water Park	
Delivering SO5:	Support.
CP55 – Air Quality	
and CP56 –	
Contaminated land	
Delivering SO5:	Policy is considered more appropriate as part of a development
CP57 – Ensuring	management development plan document (or SPD) as the policy
high quality design	will not help meet the strategic objectives of the core strategy.
and place shaping	Therefore policy should be removed or simplified.
	Specific detail within the policy should be considered within a
	subsequent SPD/DPD.
	CP57 is too detailed which will make it difficult to apply.
	Subsections of the policy should be simplified and consolidated.
	<ul> <li>Support the objectives and approach of CP57. However, it would</li> </ul>
	be helpful for certain terms to be clarified such as 'sustainability'
	and 'exceptional/high quality design'.
	Policy approach is excellent along with all supporting sections.
	However, concern over how a number of specific terms will be
	interpreted including 'complementary to the locality', and
	'effectively integrate the building into its setting'.
	<ul> <li>Agree that in order to ensure the proper planning and phasing</li> </ul>
	of a major site (particularly previously undeveloped areas),
	these proposals should be based upon a design brief / master
	plan which should be agreed prior to the submission of the
	planning application.
Delivering SO5:	CP58 should be extended to include reference to the alteration
CP58 – Ensuring	and extension where appropriate of redundant and under-used
the conservation of	historic buildings and areas.
the historic	<ul> <li>Paragraph 4 of CP58 is misleading and therefore unjustified in</li> </ul>
3.10 1.1300110	- Taragraph + Or Cr 50 is misleading and therefore unjustified in

### environment that there is no caveat as to whether or not exploitation of benefits would be both appropriate and sensitive in nature. The Plan fails to positively address Wiltshire's heritage assets at risk. There is no indication of an intention to continue to carry out at risk surveys in future to ensure there is an understanding of what is 'at risk' nor a clear strategy in response to those assets at risk. CP58 requires the inclusion of a reference to registered battlefields. Also the reference to setting at i, iii, iv, v appear to be superfluous. Clarity needs to be provided regarding the scope, purpose and timing of the additional guidance to aid the application of CP58 otherwise it may not come to fruition. Reference to the protection of the World Heritage Site within CP58 should include reference to the protection of setting. Delivering SO5: CP59 is incomprehensible. The wording of the policy also CP59 – The indicates that the obligation under the World Heritage Stonehenge, Convention is either misunderstood or inconsistently expressed. Averbury and CP59 does not clearly express an understanding of Outstanding Associated Sites Universal Value (OUV). OUV is an abstract concept that cannot World Heritage Site be managed. The policy emphasis should be upon the and its setting protection of the site and its setting rather than OUV. Delivering SO6: Purton waste site is not most efficient or sustainable for CP60 - Sustainable transport and does accord with overall stated policy. Transport CP60 & 66 both make reference to a Local Transport Plan large parts of which have still not been delivered. The LTP is not complete and a number of strategies are outstanding. Improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims. CP60 should also recognise that in relation to tourism uses, there is often no feasible alternative to the private car. Policy too weak to tie in with stated objectives and deliver a major modal shift. Transport analysis should look at issues and options for buses, rail and integration of modes for the area. Introduce a policy for public transport rather than 'sustainable transport'. Policy should include the re-opening of railway stations. Proposals for Chippenham are contrary to bullets iii. and vi. Policy is more appropriate as part of a Development Management DPD. Restricting the amount of housing to address out commuting can severely limit funding for sustainable transport. Also need to

	consider locations with a reasonable chance that a bus service
	will be used by residents and that a service can continue after
	legal agreements have ceased.
	<ul> <li>Policy is not precise or meaningful in terms of its objectives,</li> </ul>
	method or monitoring and is too vague to be convincing.
	<ul> <li>Agree that developments should be located in the most</li> </ul>
	sustainable locations, but should take account of facilities which
	may be located in adjoining authorities, such as the importance
	of Swindon to the eastern fringe of North Wiltshire.
Delivering SO6:	Policy TR14 of Salisbury District Plan should be reinstated.
CP61 – Transport	Policy wording does not refer to the reuse of buildings. The
and Development	wording does not comply with the provisions of NPPF.
	Concern re transport proposals at J16.      Delign feils to address the lawyest of popular parent. Be word.
	<ul> <li>Policy fails to address the layout of new development. Re-word policy to promote good walking and cycling environment.</li> </ul>
	Criterion (ii) should include reference to safe access to the rail
	network as well as to the highway network.
	May be more appropriate to provide offsite waiting than on site
	facilities to meet worst case scenarios, particularly for town
	centre locations.
	Unsure of implications of this policy, particularly the operation
	of the hierarchy.
	<ul> <li>Welcome the objective to reduce the need to travel and</li> </ul>
	encourage the use of sustainable transport alternatives.
	However, where a contribution is sought towards transport
	improvements it must be set out in a planning obligations DPD
	which is examined as part of the LDF process, and / or meet the
	tests of the CIL Regulations 2010
	<ul> <li>There needs to be provision in the design of road layouts for parking in front of villages facilities.</li> </ul>
Delivering SO6:	The 'national primary route network' and 'built up areas' are not
CP62 -	been defined in the Core Strategy: need clarification.
Development	
impacts on the	Developers should be allowed to use contributions more
transport network	flexibility to improve cycle and pedestrian networks beyond the
	development site.
	This policy appears to conflict with the proposals for
	Chippenham.
	In order to ensure the construction and operation of the
	transport network it will be appropriate to pool funding from a
	number of developments.
Delivering SO6:	CP63 needs to make reference to the Options Assessment
CP63 – Transport	Report and conclusion of 'Radical' transport option as specified
strategies	in the inspectors report.
	References to the Salisbury Transport Strategy need to be re-
	instated in the Wiltshire Core Strategy.
	CP63 states that a package of transport measures will be
	1 , , ,

	<ul> <li>identified in Salisbury and delivered through developer contributions. None of these appears in the template for the strategic sites, without explicit reference to Salisbury Transport Plan contributions will not be able to be sought.</li> <li>Indicators provided in the CP63 are inadequate.</li> <li>Policy should not only relate to the principal towns, but should also relate to the market towns, and should include reference to improvements to rail transport.</li> </ul>
Delivering SO6: CP64 – Demand management	<ul> <li>Standards should reflect needs of rural areas with poor public.</li> <li>Business owners should not be compelled to charge for such spaces.</li> <li>Concerned about the preference to use unallocated communal car parking: this could result in potential crime and community safety issues.</li> </ul>
Delivering SO6: CP65 – Movement of goods	<ul> <li>Plan does not properly address cross boundary movement of goods/freight.</li> <li>Thingley Junction should be mentioned as an example of a site which should be safeguarded.</li> <li>There needs to be a modal shift towards getting more large volumes of freight on to rail and water transport.</li> </ul>
Delivering SO6: CP66 – Strategic transport network	<ul> <li>Add Westbury railway station to list of stations to be improved.</li> <li>Options evaluated in SA are poor quality.</li> <li>Improving journey time reliability is only achievable in the short term and conflicts with the sustainable transport aims.</li> <li>Wiltshire and B&amp;NES need to work together and take an integrated view of the options, benefits and problems associated with managing HGVs from Southampton to the M4.</li> <li>Description of Transwilts rail line is missing. Should mention joint working with West of England Partnership on transport.</li> <li>The inclusion of Corsham railway station is welcomed.</li> <li>Greater emphasis for the need for railway station at RWB especially in relation to developments at Lyneham.</li> <li>More detail about proposals should be in policy. Unhappy at pressure being exerted by Swindon from development and design.</li> <li>Policy is more appropriate as part of a Development Management DPD.</li> <li>It is considered that the policy should be amended to make reference to the proposed access off the A350 to serve land at Showell Farm.</li> <li>There is concern that Melksham Station is being put in the same category as Corsham and Wootton Bassett even though the</li> </ul>

	latter two towns do not actually have railway stations as yet.
Delivering SO6: CP67 – Flood risk	<ul> <li>Should be a general presumption in favour of locating all new development outside flood zones 2 and 3. CP67 should make this absolutely clear.</li> <li>Risk of flooding should be viewed as part of a range of planning considerations rather than an absolute constraint.</li> <li>CP67 is too detailed and should be included in a Development Management DPD.</li> </ul>
Delivering SO6: CP68 – Water resources	<ul> <li>CP68 offers little or no support for the protection of water resources in the River Kennet.</li> <li>CP68 does not offer the level of restraint required to limit over abstraction in the River Kennet catchment. Towns like Marlborough should not be permitted to grow without first ensuring the issue of water supply is robustly addressed.</li> <li>The Core Strategy is unsound because it fails to adequately and sustainably address the issue of water supply / security.</li> <li>CP68 fails to address the requirement that all development should present water efficiency measures.</li> <li>The trend of over abstraction of many of Wiltshire's rivers cannot be allowed to continue.</li> <li>Overall levels of growth:         <ul> <li>The Plan should reduce the projected housing and employment land quantum in order to ensure that water resources and natural systems are not</li> </ul> </li> </ul>
	compromised.  The Plan is not supported by evidence to prove that water supplies can be delivered to support growth in a sustainable manner.
Delivering SO6: CP69 – Protection of the River Avon SAC	<ul> <li>CP69 should provide the same level of protection to the River Kennet SSSI as that afforded to the River Avon SAC.</li> <li>CP69 is too detailed and should appear in a Development Management DPD.</li> <li>CP69 must be re-drafted to fully comply with the rigour of the Habitats Directive and the requirements of the Appropriate Assessment regime.</li> </ul>
7. Monitoring and review  8. Glossary and	<ul> <li>Mitigation already identified in previous studies needs to be included in all of the individual Place Shaping Requirements to ensure future development conserves the historic environment.</li> <li>There are inaccuracies in relation to the 'Land East of the Dene'.</li> <li>Recommendation to include additional policy targets including:         <ul> <li>Contributions secured to maintain and improve heritage assets.</li> <li>The reduction in the number of heritage assets on the national at risk register.</li> </ul> </li> <li>Request for definition of 'sustainable development'</li> </ul>
common acronyms	General request for clarification in a number of places in the

	glossary.
Appendix A:	General comments:
Development	<ul> <li>Development templates have not been subject to</li> </ul>
templates for	formal public consultation.
strategic	<ul> <li>Welcome that strategic allocations will be brought</li> </ul>
allocations	forward through a master planning process agreed
	between the community, LPA and the developer.
	<ul> <li>Clarification needed that if the community identify</li> </ul>
	further requirements not set out in the development
	templates then these must also be considered.
	<ul> <li>Core Strategy includes only a brief generic reference to</li> </ul>
	instances where sites will affect heritage assets,
	including their setting, and features of archaeology of
	significance. This should be revised to reflect national
	planning policy more fully, particularly paragraphs 169
	and 170 of the NPPF.
	<ul> <li>40% affordable housing might not be achievable. All</li> </ul>
	provisions and contributions should be subject to
	viability. Development templates should be revised to
	reflect this or it should be an upper limit. The SHMA is
	only a snapshot in time and it is not necessarily the case
	that new urban extensions should seek to replicate the
	precise proportions.
	<ul> <li>Issues affecting more than one site:</li> </ul>
	<ul> <li>In the development templates for land at Salisbury</li> </ul>
	Road, Marlborough and land west of Warminster the
	capacity of the AONB's to produce sustainable wood
	fuel should be considered.
	<ul> <li>Natural England disagree the landscape at the West</li> </ul>
	Warminster Strategic Site and land at Salisbury Road,
	Marlborough have the capacity to accommodate the
	allocation with appropriate mitigation. Natural England
	advise that the Core Strategy is unsound on this basis
	and request that a full Landscape and Visual Impact
	Assessment be undertaken. Should this conclude that
	the sites cannot be developed without unacceptable
	landscape changes, then the strategic allocation must
	be withdrawn.
	Land at Kingston Farm, Bradford on Avon:
	<ul> <li>Remove requirement for pedestrian/cycling link to the</li> </ul>
	town centre which avoids the B3107
	<ul> <li>Land identified as 'indicative greenspace' is not available</li> </ul>
	for public use.
	<ul> <li>Employment quantum should be expressed as new build</li> </ul>
	floorspace (and should be reduced).
	Chippenham sites:
	<ul> <li>Should remove reference to delivery of a railway bridge</li> </ul>
	in relation to Rawlings Green and the North
	Chippenham Strategic Site.
	North Chippenham Strategic Site:
	<ul> <li>Amend extent of strategic site to reflect current</li> </ul>

- application.
- o Remove restrictive phasing for employment/housing.
- Template should recognise need to ensure viability on this site.
- Rawlings Green, East Chippenham Strategic Site:
  - Remove reference to employment development coming forward in advance of further residential development.
  - Amend text in relation to employment provision, including amending to cover all relevant use classes and to include reference to demand and viability.
- South West Chippenham Strategic Site:
  - Ensure that delivery of employment land is not over burdened by contributions.
  - o Unclear what the Chippenham strategy will require.
- Land at Horton Road, Devizes:
  - Natural England advise that the area of the site retained for public recreation should be landscaped naturally and screened from the main development. Footpath BCAN6 should be linked to the area.
- Land at Drummond Park, Ludgershall:
  - Outline Drummond Park planning application was designed on the basis that a future phase of development would come forward on the site to the west to provide future pedestrian and street linkages. This site should be reinstated as per the 2011 version of the CS.
- Land at Salisbury Road, Marlborough:
  - o Add potential for hotel use.
- Ashton Park Urban Extension, Trowbridge:
  - o Strategic site should include land south of West Ashton Road
  - Should be a requirement for 100m buffer for all ancient woodland.
  - Promoters of the site believe a 100m buffer would be excessive, and the extent of the buffer should be determined as part of the masterplan and design process.
  - o Promoters of the site note that all provisions and contributions will be subject to viability.
  - Important that the pro-forma only relates to land within the development.
- Land at West Warminster
  - Core Strategy is relatively silent on development affecting Cley Hill Scheduled Monument and its setting.
  - Precise capacity should not be determined until after the master plan has been undertaken. Land south of Bugley Barton Farm is not essential to the delivery of the majority of the site. The overall requirement at the West Warminster Strategic Site should be reassessed.
- Land at Mill Lane, Hawkeridge, Westbury:
  - o Comments covered in the Westbury area strategy

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section.

- Land at Station Road, Westbury:
  - Persimmon Homes & BRB (Residuary) Ltd are concerned about the viability of the Station Road strategic site. The site should be enlarged and the overall scale of development increased to 500 dwellings. An alternative site area is proposed.
- South Wiltshire Development Templates:
  - Assessment of essential infrastructure requirements has not been as rigorous as for those in the rest of the county. Natural England raises a concern about development having adequate accessible natural greenspace.
  - Format of South Wiltshire IDP and development templates should be the same as the rest of the county.

Detailed comments on infrastructure provision, other requirements and the wording of the templates have not been summarised here, but all comments received can be viewed on the council's consultation portal. In addition, some comments relating to the strategic sites are dealt with in the relevant community area sections.

# Appendix B: List of topic papers

- Not all documents were available during the previous consultation (June to August, 2011).
- Topic Paper 8 should include fire mains where it mentions fire hydrants.
- The 35% Brownfield target, referenced in Topic Paper 2, is at odds with SO7 and the NPPF.
- Topic Paper 2 needs some proof-reading, e.g. paragraph 2.1, which states that there will be further revision before the final policy wording before the end of 2011.

# Appendix C: Housing trajectory

- No detailed demonstration of the 5 year land supply.
- Lack of evidence to support the proposed housing numbers.
- Information about discussions with developers hasn't been included.
- Supply from other three former districts (not Salisbury from where it is assumed that early delivery of sites will come) is unlikely until later in the plan period.
- Housing trajectory:
  - Not detailed enough in the Core Strategy to allow analysis to be undertaken. It is not clear what sites are included and how these are to be implemented.
  - Housing trajectories are too optimistic, especially in the first 5 years of the plan.
  - Questionable whether trajectory has taken into account latest LDS or recent economic downturn.

Appendix D: Saved policies and policies replaced	<ul> <li>Policy T1a Westbury Bypass Package. Large public response looking to remove the bypass policy as has been rejected in a public enquiry.</li> <li>Policies HC2, ED21 &amp; ED22 (Kennet District Local Plan) should be removed as planning for sites has overtaken policy for a variety of reasons.</li> <li>Policies R7, H8 &amp; H9 West Wilts Local Plan should be saved for variety of reasons. Policy E1a needs to be checked as sites</li> </ul>
Appendix E: List of	<ul> <li>appear as different sizes.</li> <li>Proposed removal of settlement boundaries has not been</li> </ul>
settlement boundaries retained and Appendix F: List of settlement boundaries removed	<ul> <li>communicated to the electorate in an active manner. There has not been an open debate on this matter.</li> <li>Durrington and Bulford need to be listed in appendix E. Changes proposed to Ramsbury boundary with reference to site at land rear of Penllyne.</li> </ul>
Appendix G: Principal Employment Areas	The Principal Employment Area at Southampton Road, Salisbury should reflect the existing employment provision and be extended accordingly.
Appendix H: Proposals map	<ul> <li>The proposed Wilts and Berks canal route wasn't on the Proposals Map.</li> <li>The proposals map wasn't made available to comment on as part of this consultation therefore not allowing comments to be made.</li> </ul>
Infrastructure Delivery Plan	Strategic infrastructure:
	<ul> <li>Strategic sites:         <ul> <li>Clarify which of the Chippenham sites need to contribute to the railway crossing.</li> <li>Rawlings Green, Chippenham site is likely to be expected to deliver infrastructure not identified in the IDP.</li> <li>IDP does not mention the need for a country park at Rawlings Green, Chippenham.</li> <li>Amend costs of site access to Land at Mill Lane,</li> </ul> </li> </ul>
	Westbury.  o IDP contains reference to infrastructure to be delivered with Land South of Netherhampton Road strategic allocation, which has been removed.  • Level of information on infrastructure projects:

- Infrastructure schemes need to be fully justified, costed and include information on how and when they will be delivered.
- Change format of the south Wiltshire sections of the IDP to match those of the rest of the county.
- IDP should provide relevant information on water resources
- o IDP should place more importance on town centres.
- Preparation of the IDP:
  - o Infrastructure requirements need to be agreed between the council, infrastructure providers and developers.
  - o When will the IDP be reviewed?
- Publication of the Infrastructure Delivery Plan
  - The IDP was not included as evidence for earlier stages of the consultation.



#### 5. Conclusions on comments received

- 5.1 The consultation resulted in representations from more than 430 different organisations and individuals. A petition was received with over 90 signatures objecting to development in Chippenham, and a second petition was received with over 250 signatures requesting that the council ensure that a specific site in Devizes is not included as a strategic site. Collectively, more than 1,700 separate comments were made on different parts of the plan. These comments will be considered by the Government appointed Inspector and form the basis of the forthcoming Examination.
- 5.2 The consultation has raised no issues which officers consider merit delay in progressing to Submission. Following the consultation, a number of changes are proposed to the Wiltshire Core Strategy Pre-submission Document in the interests of improving clarity and understanding of the document, and to update it to improve consistency with the National Planning Policy Framework. These proposed changes are considered to be minor in nature and do not alter the overall substance of the Core Strategy. A schedule of all the changes proposed is included as appendix 11 to this report.
- 5.3 The majority of representations received did not lead to any changes being proposed to the draft Core Strategy. An overview of some of the key concerns and issues raised which have not led to proposed changes is provided in appendix 13 to this report, together with a brief explanation as to why changes to the draft Core Strategy are not considered justified.
- 5.4 Specific representations were also received on the draft Sustainability Appraisal (SA), and the issues raised will be summarised separately in an appendix to the SA report. The main areas of concern related to the consideration of higher and lower housing and employment figures, questions by a number of developers regarding the removal of strategic sites from the plan in some market towns, concerns over definition of sustainable development and suggestion that it would be reasonable to consider an alternative spatial strategy (one based on prioritising high density mixed use town centre development, brownfield focus, avoidance of major road capacity increase and prioritisation of social and environmentally beneficial infrastructure).
- 5.5 Whilst officers consider that the work undertaken so far is appropriate, more information will be added to the SA relating to these issues in the interests of clarity. SA is an iterative process and should take into account comments received during consultation stages. It is being updated in light of these responses and will be completed for Submission. Officers consider that this further work should not lead to any change to the draft Core Strategy as a result.
- 5.6 A number of comments were also received relating to the Infrastructure Delivery Plan (IDP). These comments have been summarised in table 6 above, and will be taken into consideration as the IDP is further developed.

This document was published by the Spatial Plans team, Wiltshire Council, Economy and Regeneration. For further information please visit the following website: http://consult.wiltshire.gov.uk/portal

